

REED SMITH LLP  
*Formed in the State of Delaware*  
Diane A. Bettino, Esquire  
Travis P. Nelson, Esquire  
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Princeton, N.J. 08540  
Tel. (609) 987-0050  
Attorneys for Sovereign Bank

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

In the Matter of Residential Mortgage  
Foreclosure Pleading and Document  
Irregularities

Docket No. F-238-11

Civil Action

CERTIFICATION OF  
SIMONE A. MARINO

-----X

I, Simone A. Marino, of full age, certify as follows

1 I am currently employed with Sovereign Bank in the Consumer Default Group and my title is Senior Vice President, Consumer Default Manager. In that capacity, I am responsible for all functions related to seriously delinquent accounts inclusive of Loss Mitigation, Foreclosure, and Bankruptcy. I am familiar with the facts set forth in this Certification

2 Sovereign Bank is committed to maintaining a responsible foreclosure process, as well as effective quality control and oversight, to ensure that its foreclosure activities are

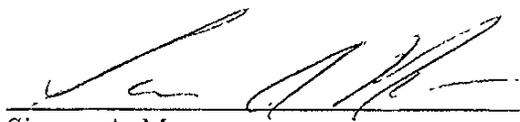
conducted consistent with applicable federal and state laws, safe and sound banking principles, and honest and fair dealing with its customers.

3. In preparation for this Certification, I have reviewed records concerning Sovereign Bank's residential mortgage lending and servicing activities in New Jersey.

4. During 2010, Sovereign Bank or its affiliates engaged in servicing of residential mortgage loans on behalf of itself and others, where such loans were secured by real estate located in New Jersey. A listing of entities for which Sovereign Bank performed these mortgage servicing activities as to properties entering foreclosure, and the number of serviced loans that entered foreclosure during 2010 listed by each entity, is attached hereto as Exhibit A.

5. During 2010, residential mortgage loans owned by Sovereign Bank or its affiliates, where such loans were secured by real estate located in New Jersey, were serviced by third party servicing entities. A listing of the entities performing these servicing activities on behalf of Sovereign Bank or its affiliates as to properties entering foreclosure, and the number of loans that entered foreclosure in 2010 that were serviced by such entities, is attached hereto as Exhibit B.

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.

  
\_\_\_\_\_  
Simone A. Marino  
Senior Vice President, Consumer Default Manager

Dated: February 14, 2011

Exhibit A

| <b>2010 New Jersey Loans in Foreclosure Serviced by Sovereign Bank</b> |   |
|--|---|
| <b>Investor Name:</b>  | <b>Loans Entering Foreclosure in 2010</b> |
| FHLMC  | 109                                       |
| FNMA   | 125                                       |
| MPF (FHLB of Pittsburgh)   | 3   |
| Sovereign  | 242                                       |
| <b>Total</b>   | <b>479</b>                                |

**Exhibit B**

| <b>2010 New Jersey Loans in Foreclosure Services by Others</b> |   |
|--|---|
| <b>Name of Servicer</b>  | <b>Loans Entering Foreclosure in 2010</b> |
| BOA-Countrywide  | 3   |
| WAMU Fleet   | 1   |
| <b>Total</b>   | <b>4</b>                                  |

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MERCER COUNTY**

In the Matter of Residential Mortgage  
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Irregularities

**Docket No. F-238-11**

**Civil Action**

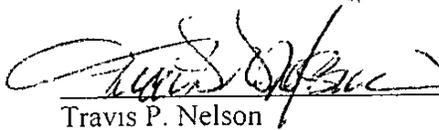
**CERTIFICATION OF GENUINENESS  
OF TELEFAX SIGNATURE**

-----X

Travis P. Nelson, of full age, hereby certifies as follows:

1 I am an attorney at law of the State of New Jersey, and an associate with the law firm of Reed Smith LLP, which represents Sovereign Bank

2. I hereby certify that Simone A. Marino acknowledged the genuineness of his telefaxed signature on his Certification, and that the Certification or a copy with an original signature affixed will be filed if requested by the Court or a party.

  
\_\_\_\_\_  
Travis P. Nelson

Dated: February 14, 2011

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MERCER COUNTY

In the Matter of Residential Mortgage  
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Docket No. F-238-11

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CERTIFICATION OF FILING AND  
PROOF OF SERVICE

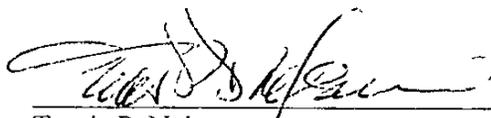
-----X

Travis P Nelson, of full age, hereby certifies as follows:

1 I am an attorney at law of the State of New Jersey, and an associate with the law firm of Reed Smith LLP, which represents Sovereign Bank

2. On February 14, 2011, I caused the original and two (2) copies of Sovereign Bank's Certification of Simone A Marino, and Certification of Telefaxed Signature have been forwarded for filing via hand delivery to the Hon. Walter R Barisonck (Special Master), Union County Courthouse, 2 Broad Street, Courtroom 101, Elizabeth, New Jersey 07207 A copy of

this submission was also sent to the Superior Court Clerk via regular mail to the Superior Court Clerk's Office, Attn: F-238-11, P.O. Box 971, Trenton, NJ 08625-0971.



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Travis P. Nelson

Dated February 14, 2011

Travis P Nelson  
Direct Phone +1 609 524-2038  
Email tnelson@reedsmith.com

RECEIVED  
FEB 17 2011  
SUPERIOR COURT  
CLERK'S OFFICE

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reedsmith.com

February 14, 2011

Via Hand Delivery

Hon. Walter R. Barisonek  
Special Master  
Union County Courthouse  
2 Broad Street, Courtroom 101  
Elizabeth, NJ 07207

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

Dear Judge Barisonek.

Reed Smith LLP represents Sovereign Bank (the "Bank") in the above-captioned matter. I have enclosed the original and two copies of the Bank's Certification in response to the Court's Supplemental Administrative Order dated January 31, 2011, together with the appended Exhibits A and B.

We ask that a member of the Court's staff file the original and return the extra copy stamped "filed" in the enclosed return envelope.

Please charge any filing fee to our Superior Court Account No. 141013. We greatly appreciate your time and consideration on this matter. Should you have any questions, or if you require any additional information, please do not hesitate to contact the undersigned.

Respectfully submitted,



Travis P. Nelson

cc Superior Court Clerk (*Via Regular Mail*)