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June 6, 2011

By Hand – Monday, June 6, 2011

Hon. Walter R. Barisonek, Special Master
Superior Court of New Jersey
Union County Courthouse
2 Broad Street
Courtroom 101
Elizabeth, NJ 07207

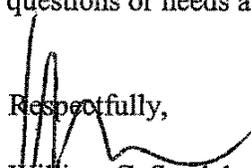
Re: In the Matter of Residential Mortgage Foreclosure
Pleading and Document Irregularities
Docket Number F-238-11
Certification of Aurora Loan Services LLC

Dear Judge Barisonek:

My office represents Aurora Loan Services LLC (“Aurora”) in connection with Administrative Order 01-2010 -- Administrative Order Directing Submission of Information from Residential Mortgage Foreclosure Plaintiffs Concerning Their Document Execution Practices to a Special Master -- issued December 20, 2010 (the “December 20 Order”), as supplemented by Supplemental Administrative Order Directing Submission of Information by Residential Mortgage Foreclosure Plaintiffs Concerning Their Document Execution Practices dated January 31, 2011 (the “January 31 Supplemental Order”) and the Court’s April 25, 2011 Letter to Foreclosing Plaintiffs Filing 200 or more residential mortgage foreclosure actions in 2010 (the “April 25 Letter”).

Enclosed please find the (a) Certification of Cheryl R. Marchant submitted on behalf of Aurora in response to the inquiries set forth in the April 25 Letter and (b) Rule 1:4-4(c) Certification. If your Honor has any questions or needs any additional information, please do not hesitate to contact me.

Respectfully,


William C. Sandelands

For: Tompkins, McGuire, Wachenfeld & Barry, LLP

WCS:ks

Encl.

c: Jennifer Perez, Clerk of the Court (By E-Filing via JEFIS)

TOMPKINS, McGUIRE, WACHENFELD & BARRY, LLP
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Attorneys for Aurora Loan Services LLC

IN THE MATTER OF RESIDENTIAL
MORTGAGE FORECLOSURE
PLEADING AND DOCUMENT
IRREGULARITIES

DOCKET NO.: F-238-11

SUBMISSION TO SPECIAL MASTER
HON. WALTER R. BARISONEK
RESPONDING TO INQUIRES IN APRIL
25, 2011 LETTER TO FORECLOSING
PLAINTIFFS

CERTIFICATION OF CHERYL R. MARCHANT

CHERYL R. MARCHANT, being of full age, certifies as follows:

1. I am a Senior Vice President of Aurora Loan Services LLC ("Aurora") and am responsible for managing the overall operations of the Foreclosure Referral, Foreclosure and Bankruptcy Departments at Aurora. I am authorized to execute this Certification and do so based upon: (a) my personal knowledge of Aurora's practices, policies and procedures as a residential mortgage loan servicer; and, (b) my review of Aurora's business records maintained in the ordinary course of its business. Aurora submits this Certification in response to the Superior Court of New Jersey's inquiries set forth in its letter of April 25, 2011 to Foreclosure Plaintiffs Filing 200 or more residential mortgage foreclosure actions in New Jersey in 2010

(the "April 25 Letter") and to assist the court in understanding how Aurora ensures that the information contained in any certification/affidavit submitted to the Court under New Jersey Court Rule 4:64-1 *et seq.* is accurate and reliable.

2. I have managed the overall operations of the Foreclosure Referral, Foreclosure and Bankruptcy Departments for over two years and have twenty-two years of experience in the residential mortgage default business. Michele Rice, who has twenty-five years mortgage industry experience and is a Vice President of Aurora, manages the day-to-day operations of the Foreclosure Department. Miralee Vasquez, who has twenty years mortgage industry experience and is an Assistant Vice President of Aurora, manages the day-to-day operations of the Foreclosure Referral Department. Neva Hall, who has thirty-four years mortgage industry experience and is an Assistant Vice President, manages the day-to-day operations of the Bankruptcy Department. Ms. Rice, Ms. Vasquez and Ms. Hall all report directly to me.

3. As part of my job duties managing these three departments, I am directly involved in developing and implementing the various processes involved in the operations of the foreclosure referral, foreclosure and bankruptcy departments.

4. Aurora acts as a servicer of residential mortgages for other entities and therefore provides the following responses to subparts (a) through (h) of Inquiry 1 set forth in the April 25 Letter.¹

¹ Aurora is not a plaintiff in any uncontested residential foreclosure action in New Jersey in a situation where any other entity acts as the servicer and therefore provides no response to Inquiry 2 set forth in the April 25 Letter.

RESPONSE TO INQUIRY 1(a)

Aurora has uniform policies and procedures for execution of affidavits and certifications filed with the court.² Aurora has adopted a uniform Certification of Proof of Amounts Due ("CPAD") to be filed in all uncontested foreclosure actions in New Jersey.³ The CPAD is based upon the affiant's personal review of Aurora's business records maintained by Aurora in the ordinary course of its business as a residential mortgage loan servicer.

In order to prepare the CPAD, Aurora utilizes a review process with multiple checks conducted by its team of trained Foreclosure Financial Processors ("Processors"). These Processors average eight years of experience in the mortgage industry with an average of six years of foreclosure specific experience.

All New Jersey Foreclosure counsel retained by Aurora are required to use the CPAD form adopted by Aurora. Foreclosure counsel prepares the CPAD by requesting from Aurora the figures and amounts to be entered on Schedule A of the CPAD. Aurora's policies and procedures require the Processor to validate all amounts due from Aurora's servicing system business records. When the first review is complete, a second separate Processor reviews the figures and recalculates the amounts due to ensure the totals are accurate and reliable. Any discrepancies in totals are researched and appropriate corrections made prior to submission to foreclosure counsel. The verified figures are then sent via a secure communications channel to

² Aurora is currently finalizing an enhanced written policy and procedures guide for foreclosure document execution. In addition, Aurora is forming a quality audit group within the Foreclosure Department that will review executed CPADs as part of its audit function. As an additional check, Aurora's Quality Control business unit conducts routine audits of the operations of the foreclosure department, including reviews of the business records used for preparation of the CPADs used in New Jersey. This unit is external to the Foreclosure Department.

³ In New Jersey, Aurora utilizes the certification format as opposed to an affidavit, which does not require notarization. Aurora understands that the certification format is expressly permitted by the Court Rules applicable in New Jersey.

foreclosure counsel who prepares the CPAD and Schedule A based on the information provided by Aurora. The completed CPAD is then sent back to Aurora for review and execution. The Processor who will execute the CPAD compares the CPAD and Schedule A to the information Aurora previously provided and to Aurora's business records. If the CPAD is accurate based on the review and comparison to Aurora's business records, the Processor will sign the CPAD and return it to foreclosure counsel. If any discrepancies are identified during the review, counsel is notified that revisions are required. Upon receipt of the revised CPAD, the Processor conducts another full and complete review. It is Aurora's policy that the Processor does not sign the CPAD until all entries are confirmed accurate based on Aurora's business records.

RESPONSE TO INQUIRY 1(b)(i)

All Processors are experienced and knowledgeable of the industry and are trained in utilizing Aurora's business records to: (a) ensure that they understand the factual statements contained in the CPAD; and, (b) are able to verify the accuracy of those factual statements based upon the review of Aurora's business records. Further, the Processors have been trained and understand the significance of the certification they make when executing the CPAD and that they are not to sign any CPAD unless and until all factual information contained in the CPAD is verified as accurate. Outside counsel is leveraged for state specific document execution training to reinforce knowledge of applicable state laws regarding document execution.

RESPONSE TO INQUIRY 1(b)(ii)

Aurora and its retained foreclosure counsel utilize the industry standard web-based application LPS Desktop for the administration of the foreclosure process. Processors within

the Foreclosure Department are able to access requests for amounts to prepare the Schedule A as well as the requests to sign documents for Aurora. However, only employees who have been trained and are authorized to prepare amount due totals have the requisite access in order to prepare the figures that are provided to foreclosure counsel. Once foreclosure counsel has prepared the CPAD based on the figures provided by a Processor, the CPAD is sent by foreclosure counsel to Aurora via the web-based application as a signature request.

Employees with authority to review and sign for Aurora have access to the requests for signature of documents. Of those employees with access to signature requests, Aurora limits the employees authorized to sign the certification and affidavits and maintains a list of those employees. Aurora maintains a Document Execution Policy which requires employees to verify their authority and approval to sign and requires review and understanding of the document prior to execution. Employees with access to the signature requests have been trained on the responsibilities associated with signing affidavits and certifications and are cognizant of the liability and risk associated with making untrue or inaccurate statements. As a result, the Processors are cautious with respect to signing affidavits and certifications and do not sign such documents unless specifically authorized to do so.

RESPONSE TO INQUIRY 1(c)

The Mortgage Servicing Package ("MSP") is a product of Lender Processing Services. MSP is a commercially available system widely used in the industry and is Aurora's system of record. MSP provides support for loan setup and maintenance, customer service, cashiering, escrow administration, investor accounting, default management and more while assisting with rapidly changing federal regulatory reporting requirements.

Users of MSP are issued individual user IDs which grant access based on group policy.

Group policies are specific to each job function and define the information that can be viewed and the changes or entries that can be made by the user.

Cash Processing

Depending on the loan's status, the Billing Statement directs a borrower to send funds to a payment processing facility ("Lockbox") in Arizona or to the Cashiering Department in Littleton, Colorado. All payments are processed upon receipt. There is nightly processing which updates MSP with the payment posting information. All funds are effective dated with Lockbox receipt date when transmitted to MSP. Reconciliations are conducted on all MSP edit transactions vs. deposits to insure cash application balancing. Cash Quality Management performs bi-weekly and monthly audits of Lockbox applications to ensure funds are processed accurately and timely.

Original Documents

Aurora maintains a secure vault at its office in Scottsbluff, Nebraska, which is maintained by Aurora's Document Control Department. The Collateral File, which includes the original Note with all endorsements and/or allonges, the Mortgage and any Assignments of Mortgage, is obtained by Aurora (typically from the Custodian for the investor) prior to the referral of the foreclosure matter to foreclosure counsel and remains in Aurora's possession in the secure vault throughout the foreclosure process. All documents in the Collateral File are imaged and available for viewing within Aurora's business records systems. Aurora maintains an imaging database for all Collateral Files scanned that includes, among other information, the scanned image and the date the image was scanned. In addition, Aurora maintains a business record system, known as the DokTrak System, which tracks the physical location of the

Collateral File. Any time the Collateral File is removed from the vault for any reason, its removal and location is noted in the DokTrak System, thus ensuring that Aurora maintains the chain of custody of the Collateral File at all times.

RESPONSE TO INQUIRY 1(d)

As stated in our response to Inquiry 1(a), there are multiple reviews of the amounts listed in the CPAD. Those reviews are completed based on reviews of the business records and there are multiple checks to ensure the amounts are accurate and reliable. As set forth in response to Inquiry 1(c), Aurora utilizes the MSP application for processing transactions affecting the loan record. Through this application, the Processors have access to and review current information for inclusion into the CPAD.

RESPONSE TO INQUIRY 1(e)

Processors with authority to sign CPADs received overview training on the servicing processes from managers of the following functions: loan transfers and special products; collateral review; document control; assignment preparation; MERS; records management; cash management; advances; property preservation; customer research and complaints; escrow management; loan ownership and transfers; call center; loss mitigation, and default reporting. Processors received hard copy materials in connection with this training and receive yearly refresher courses on the topics covered. In addition to receiving training on Aurora's systems of record and servicing procedures, Processors are also trained specifically on foreclosure document verification and execution procedures. Outside counsel also provides ongoing training to Aurora employees.

Aurora also expanded their in-house Legal staff to add additional legal support to the foreclosure and bankruptcy areas. One attorney's primary responsibility is to work with the

foreclosure and bankruptcy departments to provide expert assistance to staff on document execution review and requests.

In addition, Aurora's Learning and Development Department is formalizing a more standardized classroom training program for Processors with signing authority.

RESPONSE TO INQUIRY 1(f)

When the mortgage loan is referred to foreclosure counsel to initiate foreclosure proceedings, Aurora supplies a complete copy of the Collateral File, which includes the original Note with all endorsements and allonges, the original recorded Mortgage and any recorded Assignments of Mortgage. LPS Desktop, which is the web-based system utilized by Aurora, handles communications between Aurora and its foreclosure counsel. LPS Desktop contains information about the mortgage loan from MSP, including, but not limited to, the interest rate, first payment due date, next payment due date, loan amount, and date of Note.⁴ Loans are not referred to foreclosure until a complete review of the Collateral File is completed by the Document Control Department at Aurora.

In response to Inquiry 1(a), Aurora sets forth the process in which the CPAD is prepared and the accuracy of the factual information in the CPAD is verified. The use of the MSP application ensures that the information is accurate and is current.

RESPONSE TO INQUIRY 1(g)

Aurora has created a detailed Checklist that Processors use to review the Complaint and Judgment Package to be filed with the court. The Checklist requires a detailed review of all factual allegations contained in the Complaint (and/or the CPAD or other filing, as the case

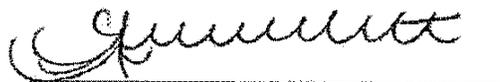
⁴ Aurora uses the LPS Desktop, which is used by a majority of servicers, to communicate with its foreclosure counsel. Aurora does not, however, utilize LPS or any other third party provider to provide any default servicing processes or services.

may be) as compared to the loan documents (which the Processor can review as scanned images contained in Aurora's database) and other business records detailed above and maintained by Aurora in the ordinary course of its servicing business. In addition, the Processor must confirm that any business records attached to the filing are exact duplicates from Aurora's business records. Any discrepancies are noted on the Checklist, which is returned to foreclosure counsel. The Checklist includes the Processor's name, title, location, and job responsibilities. Any discrepancies noted by the Processor must be resolved between the foreclosure firm and Aurora prior to the filing of the document reviewed.

RESPONSE TO INQUIRY 1(h)

Commencing in the fall of 2010, Aurora retained the services of the law firm of Morrison Foerster LLP to conduct an independent review of Aurora's foreclosure process and to work with Aurora to improve its foreclosure processes and procedures at a national level. In addition, Aurora retained the law firm of Tompkins, McGuire, Wachenfeld & Barry, LLP to supplement that review in the State of New Jersey to ensure that Aurora acts in compliance with New Jersey law and its Court Rules. Finally, Aurora retained an independent consultant to conduct a second review of its foreclosure processes nationally and provide recommendations on best practices in conducting its operations.

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



Cheryl R. Marchant

Dated: June 6, 2011

TOMPKINS, McGUIRE, WACHENFELD & BARRY, LLP

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Newark, New Jersey 07102-4070

(973) 622-3000

Attorneys for Aurora Loan Services LLC

IN THE MATTER OF RESIDENTIAL
MORTGAGE FORECLOSURE
PLEADING AND DOCUMENT
IRREGULARITIES

DOCKET NO.: F-238-11

RULE 1:4-4(c) CERTIFICATION

William C. Sandelands, of full age, hereby certifies as follows:

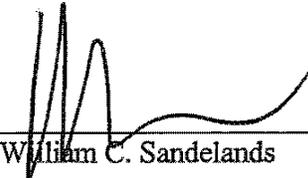
WILLIAM C. SANDELANDS, of full age, hereby certifies and says:

1. I am an attorney-at-law licensed in the State of New Jersey and a member of Tompkins, McGuire, Wachenfeld & Barry LLP, Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102, counsel plaintiff Aurora Loan Services LLC.

2. The Certification of Cheryl R. Marchant dated June 6, 2011 is being submitted with a .pdf version of the original signature of Cheryl R. Marchant. I certify that Cheryl R. Marchant has acknowledged to me the genuineness of her signature.

3. The Certification bearing the original signature will be filed with the court upon request of the court or a party.

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.



William C. Sandelands

Dated: June 6, 2011