

STERN LAVINTHAL & FRANKENBERG LLC
105 Eisenhower Parkway - Suite 302
Roseland, NJ 07068
(973) 797-1100
Attorneys for The Provident Bank

**IN RE APPLICATION BY THE
PROVIDENT BANK TO ISSUE
CORRECTIVE NOTICES OF
INTENTION TO FORECLOSE IN
PENDING UNCONTESTED
FORECLOSURE ACTIONS.**

SUPERIOR COURT OF NEW JERSEY

CHANCERY DIVISION

Docket No:

F -005164-13

CIVIL ACTION

**VERIFIED COMPLAINT IN SUPPORT
OF SUMMARY ACTION TO ISSUE
CORRECTIVE NOTICES OF INTENT
TO FORECLOSE**

Plaintiff The Provident Bank, through their attorneys, Stern, Lavinthal & Frankenberg, LLC, by way of Verified Complaint, hereby says as follows:

1. The Provident Bank is a State chartered savings bank with an office at 100 Wood Avenue South, Iselin, NJ 08830.
2. The Provident Bank services its own residential mortgage loans in New Jersey. The Provident Bank is currently servicing 7945 residential mortgage loans in New Jersey, 300 of which are in default. The loans in issue in this action are all either held by The Provident Bank or serviced by The Provident Bank.
3. It is The Provident Bank's policy to aggressively seek to address loans in default by contacting borrowers in an effort to resolve the default. Prior to the referral of an action to foreclosure counsel, efforts are made to contact the borrower to discuss the resolution of the default. Should that contact not result in a resolution of the default, a Notice of

Intention to foreclose would be sent to all obligors in accordance with the Fair Foreclosure Act.

4. The Supreme Court issued its opinion in the case of U.S. Bank National Association v Guillaume, 209 NJ. 449 (2012) in February, 2012. That case established that strict compliance with the terms of the Fair Foreclosure Act is required. Taken in tandem with the amendments to the Court Rules which required the execution of a Certification of Diligent Inquiry, any errors in the Notice of Intent to Foreclose would render a case impossible to move forward.
5. On April 4, 2012, the Supreme Court issued an Order which set forth the procedure for addressing any errors or omissions on a Notice of Intent to Foreclose. That procedure requires the filing of an Order to Show Cause and Verified Complaint. This action is being filed in accordance with the procedure set forth by the Court in that Order.
6. The Provident Bank currently has 200 pending foreclosure actions in the State. Of those matters, there are three cases in which the Notices of Intent to Foreclose may not be strictly compliant with the Fair Foreclosure Act, such that a Certification of Diligent Inquiry cannot be executed. In each case, Notices of Intention were delivered to the obligors at the property address. In each of the cases it is alleged that the mortgagor was made sufficiently aware of the gravity of the situation.
7. Attached as Exhibit A is a true and accurate copy of the form Notice of Intent to Foreclose that The Provident Bank proposes to utilize should the Court grant its request for relief. The form has been revised to comply with the Court's ruling in the Guillaume case.

8. Attached as Exhibit B is the list of uncontested Foreclosure actions filed by or on behalf of The Provident Bank which in which Final Judgment has not been entered, and for which The Provident Bank is seeking an Order permitting the service of a new Notice of Intent to Foreclose. This exhibit also lists the particular deficiency in each of the matters.
9. The Provident Bank is seeking an Order from this Court permitting the service of a new Notice of Intent to Foreclose for all of the matters listed on Exhibit B. The newly issued Notices of Intention to foreclose will not include attorney fees or costs for the currently pending foreclosure action.
10. The Provident Bank seeks the Court's permission to provide an explanatory letter to each obligor, along with the Notice of Intention to Foreclose. Attached as Exhibit C is a true and accurate copy of the form of Explanatory letter which The Provident Bank will cause to be sent to each of the obligor borrowers on the files listed in Exhibit B.

WHEREFORE, The Provident Bank respectfully requests judgment:

- (a) Deeming that the form Notice of Intention to Foreclose attached as Exhibit A compliant with the requirements of the Fair Foreclosure Act;
- (b) Permitting Plaintiff to serve new Notices of Intention to Foreclose, in the form attached as Exhibit A to defendant obligors and/or parties obligated on the underlying debt, for pre-judgment foreclosure actions listed on Exhibit B to this pleading.
- (c) Authorizing Plaintiff to serve the Explanatory Letter as proposed at Exhibit C, along with the pleadings herein.

(d) Any further relief the Court deems equitable and just.

Stern, Laventhal & Frankenberg, LLC
Attorneys for THE PROVIDENT BANK

Dated: 2/14/13

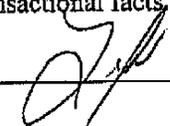


By: Laura Scurko, Esq

CERTIFICATION

I certify pursuant to Rule 4:5-1 that, to the best of my knowledge, this matter is not the subject of any other action pending in any court or of a pending arbitration proceeding, nor is any other action or arbitration proceeded contemplated, other than the pending foreclosure actions on Exhibit B I further certify that I am unaware of any non-party who should be joined in this action pursuant to Rule 4:28 or who is subject to joinder pursuant to Rule 4:29-1(b) because of potential liability to any party based on the same transactional facts.

2-14-13



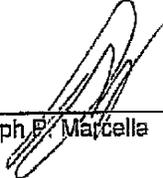
STATE OF NEW JERSEY)
COUNTY OF Middlesex)

VERIFICATION

I, Joseph P. Marcella of full age certify as follows:

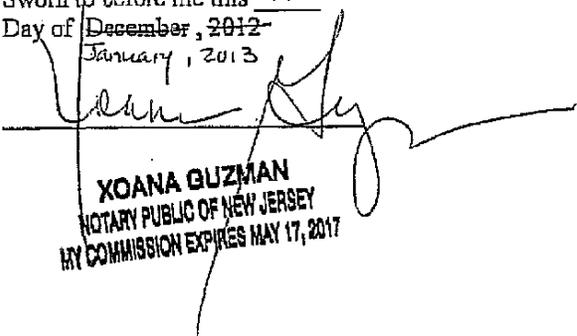
1. I am a Vice President of THE PROVIDENT BANK .
2. I have read the contents of the Verified Complaint and verify the statements contained therein are true to the best of my knowledge and personal information.
3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 1/17/13



Joseph P. Marcella

Sworn to before me this 17
Day of December, 2012
January, 2013



XOANA GUZMAN
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES MAY 17, 2017

EXHIBIT A

PROPOSED COPY OF NOTICE OF INTENT TO FORECLOSE



DATE

OBLIGOR NAME
OBLIGOR ADDRESS
OBLIGOR ADDRESS

RE: Lender's Name:
Lender's Account Number:
Servicer's Name: **The Provident Bank**
Servicer's Account Number:
Address of Mortgaged Property:

NOTICE OF INTENTION TO FORECLOSE
(N.J.S.A. 2A:50-56)

Dear OBLIGOR'S NAME

The Provident Bank is the Servicer for _____, which now holds the Note and Mortgage you executed on _____. The note you executed on _____, payment of which is secured by a mortgage on the above referenced property dated _____ in the principal amount of \$ _____ is in default, because we have not received the installments due for the months of _____.

RIGHT TO CURE DEFAULT

You may cure your default by paying or tendering \$ _____ to us, which amount must be received by us on or prior to _____. You must also pay any other scheduled installment and late charge that will become due to us during this time. Your payment must be mailed to: The Provident Bank- P.O. Box 1001, Iselin, NJ 08830-1001.

FAILURE TO CURE

If you fail to cure the default (s) by _____, then we may commence a foreclosure action against you, which will result in judgment of foreclosure being entered against you and the mortgaged property being sold at a sheriff's sale. In the event of a judgment of foreclosure and sale by the sheriff, you will lose all ownership rights in the property.

RIGHT TO CURE AFTER FORECLOSURE COMMENCED

In the event that we commence a foreclosure action against you, you will still have a right to cure the default prior to entry of the foreclosure judgment pursuant to Section 5 of the "Fair Foreclosure Act;"

Equal Opportunity Lender
Equal Housing Lender
Member FDIC 

Mailing Address: P.O. Box 1001, Iselin, NJ 08830-1001
100 Wood Avenue South, Iselin, NJ 08830-2727 • 732-590-9200 • www.ProvidentNJ.com

however, you will be responsible for our court costs and attorneys' fees in an amount not to exceed the amount permitted pursuant to the Rules Governing the Courts of the State of New Jersey.

RIGHT TO TRANSFER OWNERSHIP

In the event that you transfer the property to another person, the transfer is still subject to our rights in the mortgage covering the property. The new owner of the property may have the right to cure the default as provided in the "Fair Foreclosure Act," subject to the mortgage documents.

RIGHT TO SEEK LEGAL COUNSEL

You are advised to seek counsel from an attorney of your own choosing concerning your mortgage default. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or Lawyer Referral service in the county in which the property is located. If you are unable to afford an attorney, you may communicate with the Legal Services Office in the county in which the property is located. These numbers are listed on the attached Schedule.

POSSIBLE FINANCIAL ASSISTANCE

You are advised that there may be the possible availability of financial assistance for curing a default from programs operated by the State or Federal government or non-profit organizations, if any, as identified by the Commissioner of Banking. Section 5 of the "Fair Foreclosure Act" provides that this requirement may be satisfied by attaching a list of such programs promulgated by the Commissioner. That list is attached.

IF YOU DISAGREE WITH US

If you disagree with (1) our assertion that a default has occurred or (2) the correctness of our calculation of the amount required to cure the default, you may contact Jacqueline Sternes, Servicer at The Provident Bank, 100 Wood Avenue South, Attn: Asset Recovery Department, Iselin, New Jersey 08830-1001 or by telephoning 1-732-590-9136.

LENDER'S Contact Information:

Attn: Jacqueline Sternes 732-590-9136
100 Wood Avenue South, Iselin, NJ 08830-1001

Please be guided accordingly.

Yours truly,

Joseph P. Marcella
Vice President

JPM: mc
CERTIFIED & REGULAR MAIL

SCHEDULE A

**LIST OF NEW JERSEY STATE BAR ASSOCIATION, LAWYER REFERRAL
SERVICE, OR LEGAL SERVICES OFFICE**

New Jersey State Bar Association – Tel. 732-249-5000

Lawyer Referral Service

Following is a listing of county bar associations that offer lawyer referral services. Locate your county of residence and contact the appropriate service. Do not contact referral services that are outside of your local county.

Atlantic County Bar Association
1201 Bacharach Boulevard
Atlantic City, NJ 08401
609-345-3444
E-Mail: atcobara@aol.com
Internet: www.atcobar.org
Exec. Dir.: Mary Williams Berard

Bergen County Bar Association
15 Bergen Street
Hackensack, NJ 07601
201-488-0044
Internet: www.bergenbar.org
Exec. Dir.: Frank O'Marra Jr.

Burlington County Bar Association
45 Grant Street
Mount Holly, NJ 08060
609-261-4862 or 609-261-4863
Email: bcbaburlcoabar.org
Internet: www.burlcoabar.org
Director: Kara E. Edens

Camden County Bar Association
1040 North Kings Highway, Suite 201
Cherry Hill, NJ 08034
856-482-0618
Internet: www.camdencountybar.org
Exec. Dir.: Laurence B. Pelletier

Cape May County Bar Association
9 North Main Street
Cape May Courthouse, NJ 08210
609-463-0313
E-Mail: cmcba@comcast.net
Exec. Dir.: Michele Devine-Hartnett

Cumberland County Bar Association
PO Box 2374
Vineland, NJ 08362
856-453-7000
E-Mail: info@cumbnibarassoc.org
Internet: www.cumbnibarassoc.org
Exec. Dir.: Lou Ann Ferrari-Brooks

Essex County Bar Association
470 Martin Luther King Jr. Boulevard
Newark, NJ 07102
973-833-6775
E-mail: info@essexbar.com
Internet: www.essexbar.com
Exec. Dir.: Wendy E. Deer

Gloucester County Bar Association
PO Box 338
Woodbury, NJ 08096
856-848-4589
Email: baroffice@ocbani.org
Internet: www.ocbani.org
Exec. Dir.: Lynn Silverstein

Hudson County Bar Association
583 Newark Avenue
Jersey City, NJ 07306
201-798-4708
Internet: www.hcbalaw.com
Exec. Dir.: Lisa Burke

Hunterdon County Bar Association
PO Box 573
Annandale, NJ 08801
908-236-6109
E-mail: director@huntcolaw.org
Internet: www.huntcolaw.org
Exec. Dir.: Jeannine A. Gorman

Mercer County Bar Association
1245 White Horse Mercerville Road, Suite 420
Mercerville, NJ 08619
609-585-8200
E-mail: cbrennan@mercerbar.com
Internet: www.mercerbar.com
Exec. Dir.: Christine S. Brennan

Middlesex County Bar Association
87 Bayard Street
New Brunswick, NJ 08901
732-828-0053 ext. 100
E-mail: admin@mcbalaw.com

Internet: www.mcbalaw.com
Exec. Dir.: Jonathan P. Cowles

Monmouth Bar Association
Monmouth County Court House
Freehold, NJ 07728
732-431-5544
Email: tmaclewicz.monmouthbar@verizon.net
Internet: www.monmouthbarassociation.com
Exec. Dir.: Tracy A. Settignano

Morris County Bar Association
28 Schuyler Place
Morristown, NJ 07960
973-267-5882
Email: yperez@morriscountybar.com
Internet: www.morriscountybar.com
Exec. Dir.: Nancy M. Banglola

Ocean County Bar Association
PO Box 381
Toms River, NJ 08754
732-240-3666
E-mail: karin@oceancountybar.org
Internet: www.oceancountybar.org

Passaic County Bar Association
401 Grand Street, 3rd Floor
Paterson, NJ 07505
973-345-4585
Internet: www.passaicbar.org
Exec. Dir.: Karen A. Corsi

Salem County Bar Association
856-935-5629
Internet: www.salemcountybar.org

Somerset County Bar Association
20 North Bridge Street HCH 325
Somerville, NJ 08876
908-685-2323
Email: cawinder@somersetbar.com
Internet: www.somersetbar.com
Exec. Dir.: Carol Ann Winder

Union County Bar Association
2 Broad Street 1st Floor
Elizabeth, NJ 07207
908-353-4715
Internet: www.uclaw.com
Exec. Dir.: Jeffrey M. Clar

Warren County Bar Association
413 Second Street
Belvidere, NJ 07823
908-387-1835
Email: warrencountybar@yahoo.com

LEGAL SERVICES OFFICE

Atlantic County	Tel. 609-348-4200
Bergen County	Tel. 201-487-2166
Burlington County	Tel. 800-496-4570
Camden County	Tel. 856-964-2010
Cape May County	Tel. 609-465-3001
Cumberland County	Tel. 856-691-0494
Essex County	Tel. 973-624-4500
Gloucester County	Tel. 856-848-5360
Hudson County	Tel. 201-792-6363
Hunterdon County	Tel. 908-782-7979
Mercer County	Tel. 609-695-6249
Middlesex County	Tel. 732-249-7600
Monmouth County	Tel. 732-866-0020
Morris County	Tel. 973-285-6911
Ocean County	Tel. 732-341-2727
Passaic County	Tel. 973-523-2900
Salem County	Tel. 856-451-0003
Somerset County	Tel. 908-231-0840
Sussex County	Tel. 973-383-7400
Union County	Tel. 908-354-4340
Warren County	Tel. 908-475-2010
Legal Services of New Jersey, Inc.	Tel. 732-572-9100

No guarantee as to the accuracy of the telephone numbers set forth above is assumed implied. Consult your telephone directory.

SCHEDULE B

Fair Foreclosure Act Notice of Intention to Foreclose - List of Entities Providing Assistance

The following is a list of governmental and non-profit entities that may provide financial assistance or counseling to borrowers in foreclosure.

American Credit Alliance, Inc. 26 S. Warren St. Trenton, NJ 08608 609-393-5400	Atlantic Human Resources, Inc. 1 S. New York Ave. Atlantic City, NJ 08401 609-348-4131	Consumer Credit Counseling Service of Central New Jersey 1931 Nottingham Way Hamilton, NJ 08619 609-586-2574
Consumer Credit Counseling Service of New Jersey 185 Ridgedale Ave. Cedar Knolls, NJ 07927-1812 973-267-4324	Fair Housing Council of Northern New Jersey 131 Main St. Hackensack, NJ 07601 201-489-3552	Garden State Consumer Credit Counseling, Inc. 225 Willowbrook Road Freehold, NJ 07728 1-800-992-4557
Jersey Counseling & Housing Development, Inc. 29 S. Blackhorse Pike Blackwood, NJ 08012 856-227-3683	Jersey Counseling & Housing Development, Inc. 1840 S. Broadway Camden, NJ 08104 856-541-1000	Mercer County Hispanic Association 200 E. State St., 2nd Floor Trenton, NJ 08607 609-392-2446
Middlesex County Economic Opportunities Corporation 1215 Livingston Ave. North Brunswick, NJ 08902 732-790-3344	Monmouth County Human Services Housing Services Unit P.O. Box 3000 Freehold, NJ 07728 732-431-7998	NJ Citizen Action (main office/financial education center) 744 Broad St., Suite 2080 Newark, NJ 07102 973-643-8800 1-800-NJ-OWNER (loan counseling) 1-888-TAXES-11 (free tax preparation assistance)
NJ Citizen Action (Central Jersey) 85 Raritan Ave., Suite 100 Highland Park, NJ 08904 732-246-4772	NJ Citizen Action (South Jersey) 2 Riverside Drive, Suite 362 Camden, NJ 08103 856-966-3091	Ocean Community Economic Action Now, Inc. 22 Hyers St. Toms River, NJ 08753-0773 732-244-2351, ext. 2
Paterson Coalition for Housing, Inc. 262 Main St., 5th Floor Paterson, NJ 07505 973-684-5998	Paterson Task Force for Community Action, Inc. 155 Ellison St. Paterson, NJ 07505 973-279-2333	Puerto Rican Action Board Housing Coalition Unit 90 Jersey Ave. New Brunswick, NJ 08903 732-249-9700
Tri-County Community Action Agency, Inc. 110 Cohansy St. Bridgeton, NJ 08302 856-451-6330	Urban League for Bergen County 106 W. Pallsade Ave. Englewood, NJ 07631 201-568-4988	Urban League for Essex County 508 Central Ave. Newark, NJ 07101 973-624-9535
Urban League of Union County 288 N. Broad St. Elizabeth, NJ 07208 908-351-7200	Homelessness Prevention Program New Jersey Department of Community Affairs (866) 889-6270*	

*Basic eligibility is limited to: (a) single family owner/occupied dwellings with all those on the deed and mortgage occupying the house; (b) no more than one mortgage or lien encumbrance on the property; (c) no initiated or ongoing bankruptcy. Assistance will be in the form of a loan, and a lien will be placed on the property. The family must document the financial reason for nonpayment. At the time of the eligibility decision, the household must have and document income sufficient to support the household and repay the loan. There is a fee for the credit check and property search.

<p>1-800-550-1961 or 248-553-5400 www.greenpath.com</p>	<p>www.incharge.org</p>	<p>www.lighthousecredit.org</p>
<p>Money Management International Inc Reference # 9951553 106 Apple Street, Suite 105 Tinton Falls, NJ 07724 1-866-889-9347 or 713-394-3139 www.moneymanagement.org</p>	<p>North Seattle Community College Foundation D/B/A American Financial Solutions Reference # 9925870 One Green Tree Center, Suite 201 Marlton, NJ 08053 1-888-282-5494 or 206-374-8839</p>	<p>Take Charge America Inc Reference # 0635379 One Greentree Center, Suite 201 Marlton, NJ 08053 1-800-823-7396 or 623-266-6152 www.takechargeamerica.org</p>

DOBI Licensed Debt Adjusters

The following is a list of State licensed debt adjusters that may provide debt adjustment.

<p>American Credit Alliance, Inc. Reference # 9201158 25 S. Warren St. Trenton, NJ 08608 609-393-5400</p> <p>www.americancreditalliance.com</p>	<p>Clearpoint Financial Solutions Inc/ Credit Counselors Reference # 9947115 8000 Franklin Farm Drive Richmond, VA 23229 1-877-422-9040 or 804-222-4660</p> <p>www.clearpointfs.org</p>	<p>Community Credit Counseling Corp Reference # 9923779 5 Professional CIR Route 34 Colts Neck, NJ 07722 1-800-220-9654 or 1-800-663-4416</p> <p>www.commcrc.org</p>
<p>Consolidated Credit Counseling Services Inc Reference # 9826107 5701 W. Sunrise Blvd., Suite 200 Fort Lauderdale, FL 33313 1-800-728-3632 or 954-377-9102</p> <p>www.debtfree.org</p>	<p>Consumer Credit and Budget Counseling Inc Reference # 9823498 299 South Shore Road US Route 9 PO Box 866 Marmora, NJ 08223 609-390-9652 or 1-888-738-8233 Se Habla Espanol 1-888-5 DUDAS</p> <p>www.cc-bc.com</p>	<p>Consumer Credit and Debt Counseling Inc Reference # 9600120 95 North Lakeview Drive, PO Box 38 Gibbsboro, NJ 08026 856-566-1666 or 1-800-720-2232</p>
<p>Consumer Credit Counseling Service of Delaware Valley Inc Reference # P100890 One Cherry Hill, Suite 215 Cherry Hill, NJ 08002 1-800-989-CCCS (2.227) or 215-563-5665</p> <p>www.cccsdv.org</p>	<p>Consumer Credit Counseling Service of Greater Atlanta Inc Reference # 9945985 991-US Hwy. 22, Suite 200 Bridgewater, NJ 08807 1-800-251-CCCS (2.227)</p> <p>www.cccsatl.org</p>	<p>Consumer Credit Counseling Service of Maryland and Delaware Inc. Reference # 0753927 203 East Broadway Salem, NJ 08079 410-747-2050</p> <p>www.cccsmd.org</p>
<p>Consumer Credit Counseling Service of New Jersey Inc Reference # 8303159 185 Ridgedale Ave Cedar Knolls, NJ 07927 1-888-726-3260 or 973-267-4324</p> <p>www.cccsnj.org</p>	<p>Consumer Credit Counseling Service of San Francisco Reference # 0402042 811 Church Road, Suite 105 Cherry Hill, NJ 08002 1-800-777-7526</p> <p>www.cccssf.org</p>	<p>Consumer Education Services Inc Reference # 9922598 3801 Lake Boone Trail, Suite 400 Raleigh, NC 27607 1-888-590-2374 or 919-838-8211</p> <p>www.mvcesl.org</p>
<p>Credit Guard of America Inc Reference # 9906663 111 Cornelia St. Boonton, NJ 07005 1-800-500-6489 or 561-241-5828</p> <p>www.creditguard.org</p>	<p>Credit Management and Counseling Services Inc Reference # 9915899 46 Fawn Hollow Lane Mullica Hill, NJ 08062 856-262-0645</p>	<p>Debt Counseling Corp Reference # 0512435 One Gateway Center, Suite 2600 Newark, NJ 07102 1-888-354-6332 or 973-622-8212</p> <p>www.debtcounselingcorp.org</p>
<p>Family Financial Education Foundation Inc Reference # 9930037 724 Front St., Suite 340, PO Box 2125 Evanston, WI 52931 1-877-292-8444 or 307-789-2010</p> <p>www.ffef.org</p>	<p>Family Guidance Center Corporation Reference # 9500845 1931 Nottingham Way Hamilton, NJ 08619 609-586-8574</p> <p>http://abstaining.net/fgccorp/</p>	<p>Garden State Consumer Credit Counseling Inc (Novadebt) Reference # 9101211 225 Willowbrook Road, PO Box 5012 Freehold, NJ 07728 1-800-99-BILLS or 732-409-6281</p> <p>www.novadebt.org</p>
<p>Greenpath Inc (Greenpath Debt Solutions) Reference # 9915964 847 Meadows Office Complex, 301 Route 17 North Rutherford, NJ 07070</p>	<p>Incharge Debt Solutions Reference # 9914761 3000 Atrium Way, Suite 235 Mount Laurel, NJ 08054 1-800-565-8953 or 407-532-5553</p>	<p>Lighthouse Credit Foundation Inc Reference # 0504452 151 W. Passaic Street Rochelle Park, NJ 07862 1-800-339-2361 or 727-450-1082</p>

EXHIBIT B

The following is a list of files in which Plaintiff is seeking to issue corrective Notices of Intent to foreclose

VICINAGE	DOCKET NUMBER	DEFENDANT NAME	DEFICIENCY IN NOI
OCEAN	F-10935-10	RICARDO A. ESCOTO; CORI ANN FEINER-ESCOTO	2A:50-56(A), © (1), (6)(7)and (8)
MIDDLESEX	F-08255-10	DANIA D. VELEZ; HERIBERTO VELEZ, HER HUSBAND	2A:50-56 (A), © (1), (6)(7)and (8)
OCEAN	F-003321-11	WENDI M. BENNETT	2A:50-56(A) and (C)(1),

EXHIBIT C

PROPOSED EXPLANATORY LETTER

STERN, LAVINTHAL & FRANKENBERG LLC

COUNSELLORS AT LAW

105 Eisenhower Parkway, Suite 302

Roseland, New Jersey 07068

(973) 797-1100

Telecopier (973) 228-2679

DATE

**PLEASE READ THIS LETTER AND THE ENCLOSED DOCUMENTS CAREFULLY, AS THEY CONTAIN
IMPORTANT INFORMATION CONCERNING YOUR RIGHTS**

Defendant Name
Defendant Address
Defendant City, State Zip Code

RE: Order to Show Cause and Docket Number:

Your foreclosure Action: Plaintiff v Defendant

Dear Borrower:

Please be advised that the New Jersey Supreme Court recently held in U.S. Bank, N.A. v Guillaume, 209 N.J. 449 (2012) that mortgage lenders seeking to foreclose must comply with the New Jersey Fair Foreclosure Act's requirement that a Notice of Intention to foreclose set forth the name and address of the lender.

Why You Are Receiving this Letter

You are receiving this letter because you are the defendant in a pending foreclosure action, and it is believed that the Notice of Intention to Foreclose served upon you prior to the commencement of the foreclosure action did not comply with the requirements of the Fair Foreclose Act.

By the Court's Order to Show Cause dated _____, 2013 and in compliance with the Supreme Court's opinion in *U.S. Bank N.A. V Guillaume*, Hon Paul Innes gave permission to The Provident Bank to serve, along with the Order to Show Cause and Verified Complaint, corrected Notices of Intention to foreclose on all defendant mortgagors or parties obligated on the debt in pending foreclosure actions filed before February 28, 2012 in which The Provident Bank is the plaintiff and/or servicer.

Information About the Corrected Notice of Intention to Foreclose

Also enclosed with this letter is the corrected Notice of Intention to Foreclose. It allows you an additional 30 days in which to cure the default without having to pay the plaintiff's court costs and attorney's fees. It also sets forth important information about your loan, including information on how you can cure the default; the consequences of failing to cure the default; contact information for the plaintiff; and information about retaining counsel and borrower assistance. If you fail to cure the default by the date set forth in the corrected Notice on Intention to Foreclose, the foreclosure action against you will proceed

With the passage of time since the foreclosure action was filed against you, the lender on your loan may have changed from the named plaintiff in the foreclosure action. The corrected Notice of Intention to Foreclose lists the name and address of the current lender on your loan.

Questions about the Notice of Intention to Foreclose

Should you have question with regard to your loan or the corrected Notice of Intention to foreclose, please contact The Provident Bank at _____. Additional contact information is provided in the corrected Notice of Intention to foreclose.

How to file an Objection

You have the right to object to the enclosed Order to Show Cause (the process by which the court gave the plaintiff permission to serve the corrected Notice of Intention to Foreclose). To do so, you must file a written objection under the docket number for the Order to Show Cause.

You also have the right to object to the enclosed corrected Notice of Intention to Foreclose. To do so, you must file a written objection under the docket number for the foreclosure Action in your individual case.

For either type of objection, you must set forth with specificity the basis of the objection, and file the objection with the Superior court clerk's office at the following address by _____

Superior court Clerk's office, Foreclosure Processing services
Attention : Objection to NOI
PO Box 971
Trenton, NJ 08625

You must also serve a copy of the objection on the plaintiff's attorney:

Laura Scurko, Esq,
Stern, Lavinthal & Frankenberg, LLC,
105 Eisenhower Parkway, Suite 302,
Roseland, NJ 07068,

and mail a copy of the objection to Judge Innes at the following address:

Hon. Paul Innes,
Chancery Division, General Equity Part
Mercer County Superior Court,
Civil Courthouse, P.O. Box 8068
175 S. Broad Street
Trenton, NJ 08650-0068

Your personal appearance at the Superior Court' clerk's office or your local courthouse will not qualify as an objection. A telephone call will not protect your rights; you must file your objection and serve it on the plaintiff's attorney if you want the court to hear your objection to the relief the plaintiff is seeking. If you file a specific written objection, the case will be sent to a Judge for resolution. You will be informed by the Judge of the time and place of the hearing your objection.

Questions about filing an Objection:

Should you have any questions related to the procedure for filing an objection, please visit the New Jersey Court on Line Self Help Center at <http://www.Judiciary.state.nj.us/prose/index.htm>. You may also contact the Superior Court Clerk's office at (609-421-6100 or at SCCOForeclosure.Mailbox@judiciary.state.nj.us.

Very truly yours,

Stern, Lavinthal & Frankenberg, LLC

Enclosures:

Corrected Notice of Intent to Foreclose
Order of the Superior Court
Brief and certification in support

