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MAY 09 2013

SUPERIOR COURT
CLERK'S OFFICESuperior Court Clerk
Objection Notice Foreclose
Docket Number F-7924-13

I object to the "Order to Show Cause" and "the intent to foreclose".

On November 7, 2007 I found a job after being laid off.

On July 20, 2007 I mailed all my loan modification papers to PHH.

I never heard from PHH so I resubmitted the papers they stated "they misplaced file".

In November I started to mail my mortgage documents to PHH and they were sent back to me because they said I was to pay behind and that I should wait to hear back from the loan modification dept. I called back 9 months straight and I was told it was still pending.

I was relocated with work and never heard back from PHH.

August 2010 I resubmitted loan modification papers. Again, I kept following up and the modification dept told me they were backed up but they would get to me I never did till I received your letter which is enclosed on 5/4/13

I leave for a week long training in Atlanta 5/5/13 so I wanted to get this out ASAP.

I have filed all my loan modification paperwork which I will need to relocate. I am sure PHR has it on file somewhere.

So I am asking for time:

- 1) to get an attorney
- 2) to locate all loan modification paperwork.

Like I mentioned, I just received your letter 5/5/13 and have tomorrow to a week long training

I would like to keep the house if I can just find someone to work with and talk to me.

I have been traveling a lot with work and my oldest son lives with me in house when I am not traveling:

Currently I can be reached at

908-500-3193

4952 SE Pampano Ter
Stuart, FL 34997

Loan # 0034468041

Docket # F-7924-13

Property:
34 Park Ave
Flemington, NJ
08822

PHH Mortgage



2001 Bishops Gate Blvd
Mt Laurel, NJ

Tel 800-449-8767
Fax 856-917-8300

April 26, 2013

KATHLEEN M HALLER
34 PARK AVE
FLEMINGTON NJ 08822

Loan Number: 0034468041
Property Address: 34 PARK AVE
FLEMINGTON NJ 08822

NOTICE OF DEFAULT AND INTENTION TO FORECLOSE

Dear:

This letter is formal notice by PHH Mortgage Corporation (herein as "PHH"), the Servicer on behalf of J.P. MORGAN MORTGAGE ACQUISITION CORP. 270 PARK AVE., 10TH FL NEW YORK, NY 10017 >, the Creditor to whom the debt is owed, that you are in default under the terms of the documents creating and securing your Loan described above, including the Note and Deed of Trust/Mortgage/Security Deed ("Security Instrument"), for failure to pay the amounts due.

The loan is due for August 1, 2009 and subsequent payments, plus late charges, fees and costs. As of today, the total delinquency and reinstatement amount is \$80,843.38, which consists of the following:

Next Payment Due Date:	August 1, 2009
Total Monthly Payments Due:	\$79,434.28
37@ \$1777.16	
08@ \$1709.92	
Late Charges:	\$1409.10
Other Charges:	Other Fees: \$0.00
	Uncollected NSF Fees: \$0.00
	Unapplied Balance: <u>1440.02</u>
TOTAL YOU MUST PAY TO CURE DEFAULT:	\$80,843.38

It is possible that after payment of the amounts detailed above there may be other fees still due and owing, including but not limited to other fees, escrow advances or corporate advances that PHH paid on your behalf or advanced to your account.

RIGHT TO CURE DEFAULT

You may cure your default by paying the aforesaid amount by so that it is received at the following address on or before May 26, 2013.

You must also pay any other scheduled installments and late charges which become due after the date of this letter. Please contact a PHH representative at (800) 330-0423 to determine the exact amount due and to arrange for payment.

Please include your loan number and property address with your payment and send to:

KATHLEEN M HALLER
34 PARK AVE
FLEMINGTON NJ 08822

Re: *In re Application by PHH Mortgage Corporation to Issue Corrected Notices of Intent to Foreclose*
Docket Number: F-7924-13

Dear Sir/Madam:

PHH Mortgage Corporation ("PHH") filed the lawsuit referenced above and is asking the Superior Court of New Jersey to allow PHH to correct the Notice of Intent to Foreclose that was served on you before your separate, individual foreclosure case was filed. This request is based on the case called *U.S. Bank N.A. v. Guillaume*, 209 N.J. 449 (2012), in which the New Jersey Supreme Court held that mortgage lenders seeking to foreclose must comply with the New Jersey Fair Foreclosure Act's requirement that a Notice of Intent to Foreclose set forth the name and address of the lender.

You are not named as a direct party in this lawsuit but this case will affect your separate, pending foreclosure case.

Why You Are Receiving This Letter

You are receiving this letter because you are the defendant in a separate, pending foreclosure action, and it is believed that the Notice of Intent to Foreclose served upon you prior to the commencement of the foreclosure action did not comply with the requirements of the Fair Foreclosure Act because it did not correctly identify the name and/or address of the lender.

By the Court's Order to Show Cause April 2, 2013 and in compliance with the Supreme Court's opinion in *U.S. Bank N.A. v. Guillaume*, the Honorable Paul Innes, P.J. Ch., gave permission to PHH to serve, along with the Order to Show Cause and Verified Complaint, Corrected Notices of Intent to Foreclose on all defendant mortgagors/parties obligated on the debt in pending foreclosure actions filed before February 28, 2012.

Information About the Order to Show Cause and Verified Complaint

Enclosed with this letter is a copy of the Order to Show Cause and the Verified Complaint (without exhibits). The verified complaint lists the following lenders in the following counts of the verified complaint:

- Count 1 - Ameriquest Mortgage Company;
- Count 2 - Bank of America, N.A.;
- Count 3 - Citibank, N.A.
- Count 4 - Deutsche Bank, N.A.;
- Count 5 - Dollar Bank, FSB;
- Count 6 - Everbank;

- Count 7 - HSBC Bank, USA, N.A.;
- Count 8 - ING Bank FSB;
- Count 9 - JP Morgan Chase;
- Count 10 - Land Holding LLC;
- Count 11 - Merrill Lynch Credit Corporation;
- Count 12 - New York Life Insurance and Annuity Corporation;
- Count 13 - PHH Mortgage Corporation;
- Count 14 - PNC Bank, N.A.;
- Count 15 - Sovereign Bank;
- Count 16 - State Street Bank
- Count 17 - Sun East FCU
- Count 18 - The Bank of New York Mellon Trust Company, N.A.
- Count 19 - Tri Co FCU;
- Count 20 - U.S. Bank, N.A.; and
- Count 21 - United Teletech Financial Credit Union
- Count 22 - Wells Fargo Bank, N.A.

The attachments to the Verified Complaint, which list the foreclosure actions in which the above-named lenders are the plaintiffs, will be made available on the New Jersey Courts web site at <http://www.judiciary.state.nj.us/>. If you are unsure of the docket number for your foreclosure action, you can access that information on the court's website on the attached exhibits to the verified complaint by entering your name into the automatic search field on the website. If you do not have access to a computer or have trouble locating that information on the Court's website, you can contact Shannon Tomasso at PHH at 866-947-7729 who can assist you with locating the information about your foreclosure action.

Information About the Corrected Notice of Intent to Foreclose

Also enclosed with this letter is the Corrected Notice of Intent 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 attorneys' 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 of Intent to Foreclose, the foreclosure action against you will proceed.

If you cannot afford an attorney, you may apply for free legal assistance on-line at www.lsnjlaw.org or call the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529) or call the Legal Services office in the county where you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is attached.

If you are represented by an attorney in your foreclosure case, you should notify him or her that you received these papers. These papers are not being sent directly to your attorney if you have one.

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 Intent to Foreclose lists the name and address of the current lender on your loan.

Questions about the Notice of Intent to Foreclose

Should you have questions with regard to your loan or the corrected Notice of Intent to Foreclose, please contact Shannon Tomasso at PHH at 877-947-7729. Additional contact information is provided in the corrected Notice of Intent 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 Intent 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 Intent to Foreclose. To do so, you must file a written objection under the docket number for the *foreclosure action in your individual case, which is separate from this case filed by PHH*.

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 May 31, 2013.

Superior Court Clerk's Office, Foreclosure Processing Services
Attention: Objection to Notice of Intention to Foreclose
P.O. Box 971
Trenton, New Jersey 08625

You must also serve a copy of the objection on the plaintiff's attorney, Diane Bettino, Esquire, Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, New Jersey 08540, and mail a copy of the objection to Judge Paul Innes, P.J.Ch. Mercer County Courthouse 175 South Broad Street Trenton, New Jersey 08650.

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 on your objection.

Questions about Filing an Objection

Should you have questions related to the procedure for filing an objection, please visit the New Jersey Courts 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.