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*Pursuant to R:1-21-3(c)

June 21, 2012

Via Lawyer's Service

Hon. Margaret Mary McVeigh
Chief Judge General Equity Division
c/o
Jennifer Perez, Clerk
Superior Court of New Jersey
25 West Market Street, 6th Fl North Wing
Trenton, New Jersey 08625

Re: **In re Application by Wells Fargo Bank, N.A. to Issue Corrected Notices of Intent to Foreclose on Behalf of Identified Foreclosure Plaintiffs in Uncontested Cases. Docket No. F-09564-12**

Dear Judge McVeigh:

One of the items discussed at the hearing on June 7, 2012, was the content of the explanatory letter required by Justice Rabner's order dated 4/4/2012. It is my understanding that a there is a draft letter under consideration by the Court. As amicus, Legal Services of New Jersey offers the enclosed explanatory letter for the Court's consideration.

Thank you for your courtesy in this matter.

Respectfully submitted,

Margaret Lambe Jurow

Margaret Lambe Jurow

cc: Honorable Margaret Mary McVeigh, (via Lawyer's Service)
Kristi Robinson, (via email)
Mark S. Melodia, Esq. (via email & Lawyers Service)
Dianne Betino, Esq. (via email & Lawyers Service)

Dear HOMEOWNER NAME:

We are [WHO IS SENDING THE LETTER – SERVICER, LENDER, PLAINTIFF, PLAINTIFF'S ATTORNEY BY ROLE AND NAME].

On [DATE] [WHO] sent you a Notice of Intention to Foreclose. On [DATE] [PLAINTIFF NAME] started a foreclosure case against you by filing a foreclosure complaint with the court. The Foreclosure case against you is still going on, and is not stayed, delayed, or stopped. Judgment has not yet been entered against you, but [PLAINTIFF] will ask the Court to enter a foreclosure judgment in the future.

The Notice of Intention to Foreclose that you received before the Foreclosure Complaint was filed did not comply with the Fair Foreclosure Act and recent New Jersey Supreme Court case, U.S. Bank, NA v. Guillaume, 209 N.J. 449 (2012). [PLAINTIFF NAME] [LENDER] cannot proceed to judgment until it has complied with the Fair Foreclosure Act.

We have asked the Court to allow us to send an amended notice to you instead of dismissing the case or ordering some other form of relief. We are sending this letter and the enclosed documents to you at the direction of the Court as set forth in the enclosed Order.

We have enclosed with the letter the following documents:

- AMENDED NOTICE OF INTENTION TO FORECLOSE
- VERIFIED COMPLAINT
- COURT "ORDER TO SHOW CAUSE"

The reason why the original Notice of Intention to Foreclose was deficient is:

- THE LENDER WAS NOT NAMED
- [OTHER REASONS]

Enclosed is an Amended Notice of Intention to Foreclose. We believe that this Notice complies with the Fair Foreclosure Act. The Amended Notice of Intention to Foreclose tells you the name and address of the lender on your loan as of the date of this letter. The name may be different from the plaintiff's name on the foreclosure complaint because your loan has been transferred and the new lender has not yet asked the court to change the name of the plaintiff.

You may cure the default on your mortgage by paying the amount set forth in the amended Notice of Intention to Foreclose or by paying the amount that you would owe if you were not in default (if you believe that is less), to the person identified in the Amended Notice of Intention to Foreclose. You must make this payment within 30 days of the receipt of this Amended Notice of Intention to Foreclose. After 30 days, additional amounts, which may include the plaintiff's attorneys' fees will be required to cure the default. If you make a payment, and the payment is

not accepted, you may make a written request to the court to determine whether your payment was enough to cure the default.

You may also object to the content of the Amended Notice. The Order to Show Cause that is enclosed tells you how to raise an objection. You must follow the directions in the attached Court Order to Show Cause.

- Objections must be in writing filed with the Court and sent to the plaintiff's attorney. A phone call or email will not preserve your objection.

- Objections must say specifically why you claim that the amended notice is not adequate to make up for sending the deficient notice before the foreclosure complaint was filed or what is wrong with the amended notice.

- Objections must be filed and received by the Court by [DATE].

If you have any questions about the Amended Notice of Intention to Foreclose you may contact [NAME]. This person is a representative of the lender.

If you want to contact a person who will be your representative, not the lender's, you should contact an attorney or HUD certified housing counselor. You may contact Legal Services of New Jersey's (LSNJ's) mortgage foreclosure defense Hotline on the internet at https://lsnjlawhotline.org/ or by telephone at 888-989-5277 or contact one of the resources noted on the attached list. You can also read LSNJ's manual on defending foreclosure cases at http://www.lsnjlaw.org/english/placeilive/iownmyhome/foreclosure/foreclosureguide/index.cfm.

Very truly yours,

{name}