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SEP 12 2012

SUPERIOR COURT
CLERK'S OFFICE

Deborah L Dennis,
c/o 130 GLENBROOK PKWY #8C
Englewood, NJ [07631]
Intervenor By Special Appearance

IN RE APPLICATION BY WELLS
FARGO BANK, N.A. TO ISSUE
CORRECTED NOTICES OF INTENT
TO FORCLOSE ON BEHALF OF
IDENTIFIED FORECLOSURE
PLAINTIFFS IN UNCONTESTED
CASES

SUPERIOR COURT OF NEW JERSEY
PASSAIC COUNTY

CHANCERY DIVISION

DOCKET NO: F-009564-12

RE: ORDER TO SHOW CAUSE TO
PROCEED SUMMARILY PURSUANT TO
R.4:67-2

TO: Hon Margaret Mary McVeigh, P.J.Ch.
SUPERIOR COURT OF NEW JERSEY
PASSAIC COUNTY COURTHOUSE,
CHAMBERS 100,
71 HAMILTON STREET
PATERSON, NJ 07505

PLEASE TAKE NOTICE that the undersigned affiant, Deborah Dennis,
who is by implication a "party in interest" pursuant to a NOTICE SHE
RECEIVED IN ERROR ON AUGUST 20, 2012 from THE LAW FIRM OF
REED SMITH LLP, now appears and respectfully:

- Files the attached "AFFIDAVIT OF CONDITIONAL ACCEPTANCE
AND REQUEST FOR ABATEMENT OF ACTION PERTAINING TO
HER PROPERTY LOCATED AT 130 GLENBROOK PKWY,
ENGLEWOOD, NJ 07631, PENDING THE CONCLUSION OF
PRIVATE ADMINSTRATIVE PROCESS TO QUICKLY RESOLVE ALL

CLAIMS BROUGHT BY AMERICA'S SERVICING COMPANY (ASC)
already in progress by affiant herein,

2. And further respectfully requests to the court to administratively transfer any and all pending actions pertaining to her property located at 130

GLENBROOK PKWY, ENGLEWOOD, NJ 07631, where WELLS

FARGO BANK, N.A. is plaintiff to THE BERGEN COUNTY SUPERIOR COURT, due to the forum of PASSAIC COUNTY BEING "NON-CONVENIENT" to her,

3. And further respectfully requests, THAT SHE BE GRANTED an extra 30 days after the conclusion of the private administrative process of the parties to answer "THE AMENDED VERIFIED FORECLOSURE COMPLAINT" BY WELLS FARGO BANK, N.A.

4. And grant to her any and all other relief the court deems fair and equitable in the interest of substantial Justice:

NOTICE: IF YOU WANT TO RESPOND TO AFFIDAVIT YOU MUST DO SO IN WRITING. Your written response must be in the form of a certification or affidavit. That means that the person signing it swears to the truth of the statements in the certification or affidavit and is aware that the court can punish him or her if the statements are knowingly false. You may ask for oral argument, which means you can ask to appear before the court to explain your position. If the court grants oral argument, you will be notified of the time, date and place. Your response, if any, must be in writing even if you request oral argument. Any papers you send to the court must also be sent to the opposing party's attorney or the opposing party if not represented by an attorney.

If you do not notify the Clerk and the undersigned in writing within ten (10) days of service of the motion that you object to entry of the order sought, the court, in its discretion, may enter the order against you without a hearing.

Sept 4, 2012
Date

By: Leborah L. Dennis
Signature

Leborah L. Dennis
Type or Print Your Name

(Check One) Defendant Plaintiff

Deborah L Dennis,
c/o 130 GLENBROOK PKWY #8C
Englewood, NJ [07631]
Intervenor By Special Appearance

IN RE APPLICATION BY WELLS
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NUNC PRO TUNC AFFIDAVIT OF
CONDITIONAL ACCEPTANCE IN
SUPPORT

STATE OF NEW JERSEY):
COUNTY OF BERGEN):

Deborah Dennis, the one sovereign woman, standing in her
unlimited commercial capacity as Holder In Due
Course/settlor/creditor/Intervenor for the IDEM SONANS/ENS
LEGIS/LEGAL FICTION A/K/A "DEBORAH DENNIS"AND/OR
DERIVATIVES THEREFROM" without accepting any statutory
privileges or benefits, identified below as the speaker, NOW appears
specially to as follows:

1. Affiant received a certain unsolicited NOTICE ON AUGUST 20, 2012 from THE LAW REED SMITH LLP, informing her of a pending ORDER TO SHOW CAUSE IN THIS COURT in which her proprietary interests are involved.
2. Affiant PRIVATELY received on AUGUST 20, 2012, an unsolicited NOTICE OF CLAIM OF OUTSTANDING DEBT FROM "**AMERICA'S SERVICING COMPANY**", A DIVISION OF **WELLS FARGO BANK, N.A.** dated AUGUST 14, 2012.
3. As THE SAID CLAIMS INVOLVES ISSUES OF MATERIAL FACT, affiant has conditionally accepted the offers pending the return of proof of the claim to her privately to resolve the issues expeditiously.
4. As such, affiant respectfully requests that the court temporarily abate the proceedings involving her private property located at **130 GLENBROOK PKWY, ENGLEWOOD, NJ 07631**, pending the conclusions of the private administrative process to resolve the issues pertaining to her interests and claims of alleged "DEBT" BY AMERICA'S SERVICING COMPANY.
5. Affiant respectfully requests that the court abate any and all proceedings regarding whether she intends to "FILE AN OPPOSITION AGAINST **WELLS FARGO BANK, N.A.'S SHOW CAUSE**" until the unresolved issue of THE EXISTENCE OF BONA FIDE & LAWFUL "DEBT" is

resolved and settled through the private administrative process already initiated by her.

6. Affiant respectfully requests to the court to administratively transfer any and all pending actions pertaining to her property located at **130 GLENBROOK PKWY, ENGLEWOOD, NJ 07631**, currently in your court in PASSAIC COUNTY SUPERIOR COURT, where **WELLS FARGO BANK, N.A.** or **AMERICA'S SERVICING COMPANY** is plaintiff AND affiant IS DEFENDANT, to THE BERGEN COUNTY SUPERIOR COURT for further proceedings consistent with the court's discretionary powers, due to the forum of PASSAIC COUNTY BEING "NON-CONVENIENT" to affiant.
7. Affiant respectfully requests, THAT SHE BE GRANTED an extra 30 days on the court's calendar to answer "THE AMENDED VERIFIED COMPLAINT" BY **WELLS FARGO BANK, N.A. AND OR AMERICA'S SERVICING COMPANY**, in the event that THE MOTIONS OF **WELLS FARGO BANK, N.A.** TO FILE AMENDED VERIFIED COMPLAINT IN FORECLOSURE IS GRANTED.
8. Affiant respectfully wishes that she be granted any and all other relief the court deems fair and equitable in the interest of substantial Justice.
9. This is affiant's first time of seeking the preceding remedies herein.

I certify that the foregoing was done in good faith by me and my requests are reasonable to the best of my knowledge, information and belief.

Sept 4, 2012
Date

By: Deborah L. Dennis
Signature

Deborah L. Dennis
Type or Print Your Name

(Check One) Defendant Plaintiff

Adriana Santamaria
NEW JERSEY NOTARY PUBLIC

Nov 3rd / 2015
MY COMMISSION EXPIRES

Adriana Santamaria
ADRIANA SANTAMARIA
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 11/3/2015



Sworn to and subscribed
before me this
4 day of Sep, 2012

Deborah L Dennis,
c/o 130 GLENBROOK PKWY #8C
Englewood, NJ [07631]
Intervenor By Special Appearance

IN RE APPLICATION BY WELLS
FARGO BANK, N.A. TO ISSUE
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DOCKET NO: F-009564-12

RE: ORDER TO SHOW CAUSE TO
PROCEED SUMMARILY PURSUANT TO
R.4:67-2

NUNC PRO TUNC AFFIDAVIT OF
CONDITIONAL ACCEPTANCE IN
SUPPORT

CERTIFICATION OF SERVICE

I certify that I served a copy of Affiant's NUNC PRO TUNC AFFIDAVIT
OF CONDITIONAL ACCEPTANCE AND REQUEST FOR ABATEMENT OF
ACTION PERTAINING TO HER PROPERTY LOCATED AT 130
GLENBROOK PKWY, ENGLEWOOD, NJ 07631, PENDING THE
CONCLUSION OF PRIVATE ADMINSTRATIVE PROCESS TO QUICKLY
RESOLVE ALL MATTERS and any accompanying pages by mailing it to
the persons and attorneys listed below by regular and certified mail.

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.

**TO: Hon Margaret Mary McVeigh, P.J.Ch.
SUPERIOR COURT OF NEW JERSEY
PASSAIC COUNTY COURTHOUSE,
CHAMBERS 100,
71 HAMILTON STREET
PATERSON, NJ 07505**

**CLERK OF THE SUPERIOR COURT,
FORECLOSURE PROCESSING SERVICES
ATTN: OBJECTION TO NOTICE OF INTENTION TO FORECLOSE
25 MARKET STREET
P.O. BOX 971
TRENTON, NJ 08625-0971**

**MARK MELODIA
REED SMITH LLP
PRINCETON FORRESTAL VILLAGE
136 MAIN STREET
PRINCETON, NJ 08540**

Sept 4, 2012
Date

By: Deborah L. Dennis
Signature

Deborah L. Dennis
Type or Print Your Name

(Check One) Defendant Plaintiff



8/14/2012

RECEIVED

SEP 12 2012

SUPERIOR COURT
CLERK'S OFFICE

DEBORAH DENNIS
130 GLENBROOK PKWY APT 8C
ENGLEWOOD, NJ 07631-2152

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 Number F- 009564-12

Dear DEBORAH DENNIS:

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 Foreclosure Act.

By the court's Order to Show Cause dated July 19, 2012, and in compliance with the Supreme Court's opinion in *U.S. Bank N.A. v. Guillaume*, the Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, gave permission to America's Servicing Co. to serve, along with the Order to Show Cause and verified complaint, corrected Notices of Intention 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 are copies of the Order to Show Cause and verified complaint. The verified complaint lists the following lenders in the following counts of the verified complaint:

- Count 1 - Bank of America, N.A.
- Count 2 - Bank of New York Mellon
- Count 3 - BankAtlantic
- Count 4 - Bayview Financial
- Count 5 - CitiBank, N.A.
- Count 6 - Commerce Bancorp.
- Count 7 - Copperfield Investments
- Count 8 - Deutsche Bank
- Count 9 - DLJ Mortgage Capital, Inc.
- Count 10 - E*Trade
- Count 11 - EMC Mortgage

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 questions with regard to your loan or the corrected Notice of Intention to Foreclose, please contact:

Randy Bockenstedt, Senior Vice President
America's Servicing Co.
Address: 3480 Stateview Boulevard
MAC X7802-03H
Fort Mill, SC 29715
Phone Number: 1-800-868-0043

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 within 30 days:

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 America's Servicing Co.'s attorney, Mark S. Melodia, Esquire, Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, New Jersey 08540 and mail a copy of the objection to Judge McVeigh, J.S.C., Superior Court of New Jersey, Chambers 100, 71 Hamilton Street, Paterson, New Jersey 07505.

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.

REED SMITH LLP
Formed in the State of Delaware
Mark S. Melodia, Esquire
Diane A. Bettino, Esquire
Princeton Forrestal Village
136 Main Street, Suite 250
Princeton, New Jersey 08540
Tel. (609) 987-0050

Attorneys for Wells Fargo Bank, N.A.

FILED

JUL 10 2012

~~Chancery/General Equity~~

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

) SUPERIOR COURT OF NEW JERSEY
) CHANCERY DIVISION
) PASSAIC COUNTY

) DOCKET NO.: F-009564-12

) CIVIL ACTION

) ORDER TO SHOW CAUSE
)
)
)

THIS MATTER being brought before the Court by Reed Smith LLP, attorneys for Wells Fargo Bank, N.A. ("Wells Fargo"), authorized to act on behalf of Foreclosure Plaintiffs in pending foreclosure cases in New Jersey, seeking relief by way of summary action for an Order permitting Wells Fargo to issue corrected Notices of Intent to Foreclose ("NOI") to the defendant mortgagor and/or parties obligated on the debt ("Foreclosure Defendants") in the pending, pre-judgment, uncontested foreclosure cases listed on the Exhibits 1 through 34 to the Amended Verified Complaint ("Corrected NOI List") to include the name and address of the lender, and based upon the New Jersey Supreme Court's decision in US Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), the implementing Order of the New Jersey Supreme Court dated April 4, 2012, and for good cause shown;

It is on this 19 July day of 2012 ORDERED that the Foreclosure Defendants whose names appear on the Corrected NOI List may appear before the Superior Court at the Passaic County Courthouse, 71 Hamilton Street, Paterson, New Jersey at 10 o'clock in the ~~noon~~ or as soon thereafter as counsel can be heard, on the 3 day of October, 2012 to object to this Court's Order allowing Wells Fargo to issue corrected NOIs pursuant to this Order to Show Cause.

AND IT IS FURTHER ORDERED THAT FOR EACH FORECLOSURE ACTION IN WHICH WELLS FARGO ISSUES A CORRECTED NOI TO A FORECLOSURE DEFENDANT:

1. Wells Fargo will issue a letter ("Explanatory Letter") to each Foreclosure Defendant in the form attached as Exhibit A to the Verified Complaint. The Explanatory Letter will explain:

- the reasons why the corrected NOI is being served;
- the procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI;
- the individuals to contact with any questions; and
- their right to object to the corrected NOI or their right to cure the default within 30 days of the date of the corrected NOI.

2. Wells Fargo will issue a corrected NOI in the form attached as Exhibit B to the Verified Complaint and shall attach such NOI to the Explanatory Letter referenced in paragraph 1 above. The corrected NOI will exclude attorneys' fees and foreclosure costs that have been incurred in the pending foreclosure cases. In accordance with the servicing guidelines and as required by N.J.S.A. 2A:50-56(e), the Explanatory Letter and corrected NOI will be sent by Wells Fargo, the servicing agent.

3. Wells Fargo will serve the corrected NOI, the Explanatory Letter and a copy of this Order to Show Cause (collectively, the "OSC Package"), via certified mail, return receipt requested and regular mail at the last known address of the Foreclosure Defendant. For purposes of this Order to Show Cause, Wells Fargo may serve each marital couple residing at the same address with one OSC Package via certified mail and regular mail.¹

4. A copy of Wells Fargo's complete application to this Court shall be loaded onto the New Jersey Courts website within 5 days of the date of this Order where it will be available for review by the general public at the website link -- <http://www.judiciary.state.nj.us/>.
and all attachments will be provided in searchable PDF'S FILES

5. In addition to providing service of the OSC Package by certified and regular mail, Wells Fargo will, within 2 days *Prior to Sept 1, 2012* of ~~the date of this Order~~, provide publication notice two (2) times in each of the following four (4) daily newspapers in a manner consistent with similar legal notices: *Star Ledger, Bergen Record, The Press of Atlantic City, Gloucester County Times*

6. Wells Fargo shall file with the Court its proof of service of the OSC Package on Foreclosure Defendants on the Corrected NOI List in the manner consistent with this Order no later than nine (9) days before the return date.

7. You [Foreclosure Defendants] have the right to object in this proceeding to this Order to Show Cause (the process by which this Court gave Wells Fargo permission to serve the corrected NOI). To do so, you must file a written objection under the docket number listed on the first page of this Order for this case. You must set forth with specificity the basis for your objection and file your objection with the Superior Court Clerk's Office at the following address within days: *on or before September 24, 2012.*

¹ In the event Wells Fargo has been provided an address for the estate of a deceased Foreclosure Defendant, the OSC Package shall be mailed to the address of the estate and/or the executor or administrator, if known and available.

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 Wells Fargo's attorney, Mark Melodia, Esquire at Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, New Jersey 08540, and mail a copy of your objection to Judge McVeigh at the Superior Court of New Jersey, Passaic County Courthouse, Chambers 100, 71 Hamilton Street, Paterson, New Jersey 07505.

8. You [Foreclosure Defendants] also have the right to object to the corrected NOI that you will receive. You will also have 30 days from service of the OSC Package to cure your default. If you object to any of the contents of your corrected NOI, you must file written objection under the docket number for your foreclosure action. 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 or by calling the Wells Fargo representative listed on the Explanatory Letter that will be sent with the corrected NOI. You must set forth with specificity the basis for your objection and file your objection with the Superior Court Clerk's Office at the following address *on or before Sept 24, 2012* within _____ days of receipt of the corrected NOI:

Superior Court Clerk's Office, Foreclosure Processing Services
P.O. Box 971
Trenton, New Jersey 08625

You must also serve a copy of the objection on Wells Fargo's attorney, Mark Melodia, Esquire at Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, New Jersey 08540, and mail a copy of your objection to Judge McVeigh at the Superior Court of New Jersey, Passaic County Courthouse, Chambers 100, 71 Hamilton Street, Paterson, New Jersey 07505.

9. Wells Fargo may file and serve any written reply to any opposition papers received by *Sept 28*, 2012. The reply papers must be filed with the Clerk of the

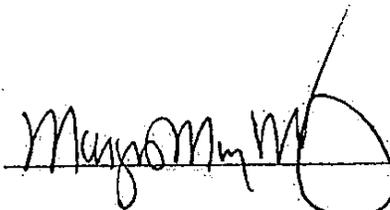
Superior Court in Mercer County, with a copy to Judge McVeigh and to each Foreclosure Defendant who filed an opposition.

10. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided with the corrected NOI.

11. A proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court by Wells Fargo no later than nine (9) days before the return date.

12. The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause.

13. In the event a foreclosure action has been suspended or stayed as a result of a bankruptcy filing or loss mitigation activity, the OSC Package shall not be sent unless and until the suspension or stay is lifted. In such circumstances, the following procedure shall be used. Wells Fargo shall mail the OSC Package within 45 days of the lifting of the stay or suspension of the foreclosure action. You [Foreclosure Defendants] will have 30 days in which to object to the corrected NOI or 30 days from service of the OSC Package to cure your default. Any objections to the relief set forth in this Order to Show Cause shall be made in writing to the Court in the County in which your foreclosure action is pending. You must also send a copy of your written papers to Wells Fargo's attorneys, Mark Melodia, Esquire, Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, New Jersey 08540, or the Court handling your foreclosure action will not be able to consider your objection.



J.S.C.