

RECEIVED

SEP 18 2012

Supreme Court
County of Passaic : State of New Jersey

SUPERIOR COURT
CLERK'S OFFICE

WELLS FARGO BANK, N.A.

Plaintiff

Docket No. : F-009564-12

-VS-

VILMA MEJIA
RAMON MEJIA

VERIFIED ANSWER TO
FORECLOSURE COMPLAINT

Defendant

Defendant Answers as follows :

General Denial

OTHER FACTS CONCERNING YOUR MORTGAGE, YOUR HOME, OR OTHER DEFENSES
OR COUNTER CLAIMS :

I have already filed for loan modification. Bank has all necessary documents. Also verified
that my loan modification file is under the "Wells Fargo home mortgage unemployment"
program review. We agreed to this program and continuing the forbearance plan payment.
We attach the forbearance plan payment copy for your convenience.

Wherefore, the Defendant requests that the Complaint be dismissed; the relief requested by the
Defendant be granted in its entirety; the costs associated with this defense; and any other relief
allowed by law and considered just by this Court.

DATED : 9-15-2012

DEFENDANT'S NAME : Vilma Mejia
Ramon Mejia

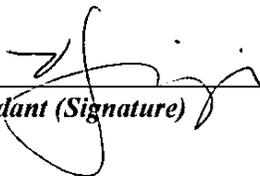
Appearing prose

DEFENDANT'S ADDRESS : 102, Arlington Boulevard, North Arlington, NJ 07031

DEFENDANT'S TELEPHONE NUMBER : 201 998 3261

VERIFICATION

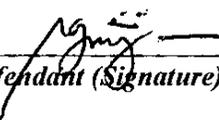
We, Vilma Mejia & Ramon Mejia being duly sworn, state that the within Answer is true to the best of our knowledge, except as to those matters alleged upon information and belief, which we believe to be true.



Defendant (Signature)

Vilma Mejia

Defendant (Print Name)



Defendant (Signature)

Ramon Mejia

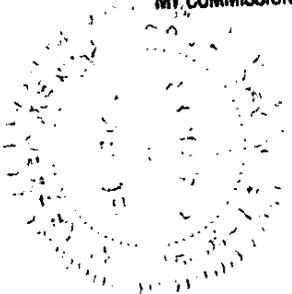
Defendant (Print Name)

Sworn to and subscribed before me on
September 15, 2012



Notary Public

**COURTNEY N. BUCKLEY
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES AUG. 11, 2018**



WELLS FARGO HOME MORTGAGE
RETURN MAIL OPERATIONS
PO BOX 10368
DES MOINES IA 50306-0368



07/30/12



1AT 00276/009385/000583 0029 4 ACPJX8 CL027 708

VILMA MEJIA
RAMON MEJIA
102 ARLINGTON BOULEVARD
NORTH ARLINGTON, NJ 07031-5846

Account Information	
Online:	wellsfargo.com
Fax:	(866) 590-8910
Telephone:	(800) 416-1472
Correspondence:	PO Box 10335 Des Moines, IA 50306
Hours of Operation:	Mon - Fri, 7 AM - 10 PM Sat, 8 AM - 2 PM CT
Loan Number:	0171067119
Property Address:	102 Arlington Boule North Arlington NJ 07031

Subject: You're approved for mortgage payment assistance under the *Wells Fargo Home Mortgage Unemployment Program*

Dear Vilma Mejia & Ramon Mejia:

Thank you for sending us the information and documents supporting your request for mortgage payment assistance under the *Wells Fargo Home Mortgage Unemployment Program*.

You have been approved

We're pleased to let you know that after carefully reviewing your information, you are approved for a forbearance plan under the *Wells Fargo Home Mortgage Unemployment Program*. This program provides you a forbearance period during which time your monthly mortgage payments are temporarily reduced while you seek re-employment. Please be sure to read this entire letter to understand the requirements of the forbearance plan (the "Plan").

What you need to do

Under the Plan, you are required to do the following:

- You must make the new monthly "forbearance plan payments" in the amounts and by the dates noted below. Even though your monthly statement will continue to show your regular mortgage payment amount, while you're under the Plan be sure you make the following forbearance plan payments by the due dates noted in place of your regular monthly mortgage payments:

01	09/01/12	944.23	02	10/01/12	944.23	03	11/01/12	944.23	04		
	12/01/12	944.23	05	01/01/13	944.23	06	02/01/13	944.23			

- You must contact us immediately if you become employed during the forbearance period. Then we'll send you a package to complete and return so we may determine the options that may be available to you.
- You must contact us on a monthly basis to provide regular updates on your employment status.
- We can be reached at the phone number below.

How to make your payments



WFM307P



CL027 708
009385/000583 ACPJX8 51-ET-M1-0029

7080171067119CL027

Account Information

Loan Number: 0171067119

Property Address: 102 Arlington Boule
North Arlington NJ 07031

- You may choose to make your forbearance plan payments by phone through our **Easy PaySM** service for direct transfer from your bank account. Simply call the phone number listed in the account information section of this letter.
- If you prefer to mail each of your forbearance plan payments by the specified due date, send them to the following address:

Wells Fargo Home Mortgage
1200 W 7th Street Suite L2-200
Los Angeles, California 90017

About automatic payments

If your mortgage payments are currently being made through automatic, electronic withdrawals by Wells Fargo Home Mortgage through our **Preferred Payment PlanSM** options or any other provider, it's important you understand that we are not able to collect your forbearance plan payments in this manner.

Please be aware that it is your responsibility to stop those withdrawals before you make your first forbearance plan payment. To cancel **Preferred Payment PlanSM** automatic withdrawals, call us at the phone number in the account information box on the first page of this letter at least five business days before the date you need the withdrawals stopped.

You will need to make your forbearance plan payments as noted above - either by phone through **Easy PaySM** service, or by mail.

Once you complete the Plan, you will have to re-enroll if you'd like to continue automatic withdrawals. We encourage you to re-enroll in this service, as it's a helpful way to ensure your payments are made and your mortgage remains current. To re-enroll after the forbearance period, call a Wells Fargo Home Mortgage representative at the number listed in the account information box of this letter.

What you need to know**While you are participating in the Plan**

During the forbearance period, while you are following the terms of the Plan, the conditions noted below apply:

- If your loan is in foreclosure, once the first trial payment and a copy of this signed agreement has been received, we will inform our foreclosure counsel to place your foreclosure proceedings on hold. As long as you follow the terms of the Plan's Agreement, the foreclosure process will remain on hold.
- We will report to the credit bureaus that you are paying under a partial payment agreement for your Wells Fargo Home Mortgage mortgage.
- Even though your monthly forbearance plan payments are lower than your regular mortgage payments, the difference in the payment amounts accrues. We keep track of the total amount that accrues during the Plan period. The total accrued amount then becomes due and is your responsibility to pay after you complete the Plan, or when you become fully employed. When that happens, you can apply for payment assistance through a loan modification.



7060171067119CL027

Account Information	
Loan Number:	0171067119
Property Address:	102 Arlington Boule North Arlington NJ 07031

After completing the Plan or becoming employed

- At the end of the Plan or when you become employed, we'll send you a package to complete and return so we may determine the options that may be available to you.
- Please understand, if you are not approved for the *Wells Fargo Home Mortgage Modification Program*, or an alternate loan modification program, all the following apply:
 - The original terms of your existing mortgage will apply, including rate, terms, late fees and accrued interest.
 - The original payment amount noted in your existing mortgage agreement will resume.
 - Your loan will continue in the foreclosure process per the terms of your existing mortgage.
 - If your loan was in foreclosure when The Plan was approved then, the foreclosure action will resume from the point it was suspended for The Plan.

If you do not follow the Plan requirements

If you do not follow the requirements of the Plan, the following conditions may apply:

- If Wells Fargo Home Mortgage does not receive each of the forbearance plan payments in the amounts and by the due dates noted in this letter, this Plan will end and your mortgage may not be eligible for other federal government mortgage assistance programs. If that happens, call us to discuss the other options that are available to you. We can be reached at the phone number below.
- This Plan will be cancelled, whether or not Wells Fargo Home Mortgage receives your forbearance plan payments, if along the way you do not submit timely, complete documentation as required by the *Wells Fargo Home Mortgage Unemployment Program* or by Wells Fargo Home Mortgage, your mortgage servicer. As your mortgage servicer, we are not obligated to offer you any other mortgage payment assistance options and have the right to require that you follow the terms of your existing mortgage.
- Even though you are participating in this Plan, you remain responsible for all other terms and conditions of your existing mortgage. If you do not follow the requirements of this Plan, it will be voided and may be permanently cancelled. Wells Fargo Home Mortgage has the option to move forward with the foreclosure process per the terms of your existing mortgage, which may result in additional fees that would be your responsibility.

We're here to help you

If your circumstances change, particularly if you become employed, please call me immediately. I also encourage you to call if you have any questions. I can be reached at the phone number listed below.

Sincerely,

Cheryl Ambrose

Cheryl Ambrose
Home Preservation Specialist
Wells Fargo Home Mortgage
Ph: 1-877-808-6144 ext. 87927



Account Information

Loan Number: 0171067119

Property Address: 102 Arlington Boule
North Arlington NJ 07031

Fax: 1-866-590-8910

Additional assistance is available, at no cost

Many customers tell us that monthly expenses other than their mortgage payment are placing an additional strain on their finances. If you are in this situation, we encourage you to contact a HUD-approved, non-profit credit counseling agency. At no charge, a counselor will work closely with you to lower your other monthly payments, take your financial circumstances into consideration, and create a budget plan that may work for you. To find a local agency, call (800) 569-4287 or call the HOPE Hotline at (888) 995-HOPE.

Be sure you avoid anyone who asks for a fee for counseling or a loan modification, or asks you to sign over the deed to your home, or to make your mortgage payments to anyone other than Wells Fargo Bank, N. A..

This communication is an attempt to collect a debt and any information obtained will be used for that purpose. However, if you have received a discharge of this debt in bankruptcy or are currently in a bankruptcy case, this notice is not intended as an attempt to collect a debt, and we have a security interest in the property and will only exercise our rights as against the property.

With respect to those loans secured by property located in the State of California, the state Rosenthal Fair Debt Collection Practices Act requires that, except under unusual circumstances, collectors may not contact you before 8 a.m. or after 9 p.m. They may not harass you by using threats of violence or arrest or by using obscene language. Collectors may not use false or misleading statements or call you at work if they know or have reason to know that you may not receive personal calls at work. For the most part, collectors may not tell another person, other than your attorney or spouse, about your debt. Collectors may contact another person to confirm your location or enforce a judgment. For more information about debt collection activities, you may contact the Federal Trade Commission at 1-877-FTC-HELP or www.ftc.gov.

The federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex or marital status, or age (provided the applicant has the capacity to enter into a binding contract); because all or part of the applicant's income derives from any public assistance program; or because the applicant has in good faith exercised any right under the Consumer Credit Protection Act. The federal agency that administers compliance with this law concerning this creditor is Office of the Comptroller of the Currency, Customer Assistance Group, 1301 McKinney Street, Suite 3450, Houston, TX 77010-9050.

Wells Fargo Home Mortgage is a division of Wells Fargo Bank, N. A. © 2011 Wells Fargo Bank, N. A. All rights reserved. Equal Housing Lender.
NMLSR ID 399801



7080171067119CL027