GIRGES LAW PLLC
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FILED Sep 24, 2012

Hany H. Girges*
Sheryl E. Montour**
Catherine Dimiane**
* admitted in NY
** admitted in NY & NJ

Writer's Email: cdimiane@girgeslaw.com

RECEIVED
SEP 24 2012
MARGARET MARY McVEIGH, P.J.C.

September 19, 2012

Superior Court Clerk's Office
Foreclosure Processing Service
P.O. Box 971
25 Market Street
Trenton NJ 08611-2148
Attn.: Objection to Notice of Intention to Foreclose

Re: HSBC Bank USA, National Association as Trustee for Wells Fargo Asset Securities Corporation, Mortgage Asset-Backed Pass-Through Certificates Series 2007-PA6 v. Adel Micheal, et al
Docket No: F-57093-09 and F-009564-12
Property: 689 Avenue E, Bayonne, NJ 07002

Dear Sir or Madam:

We represent the defendant, Adel Micheal, in the above-captioned foreclosure matter.

In connection with the above-captioned matter, enclosed please find Opposition to Corrected Notices of Intent to Foreclose.

Please forward stamped "Filed" copy of the foregoing using the attached self-addressed prepaid envelopes.

Please contact us for any additional information or documents relative to the foregoing.

Very Truly Yours,

Catherine Dimiane, Esq.

cc: Zucker, Goldberg & Ackerman, LLC
Mark S. Melodia, Esq., Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, New Jersey 08540
Judge McVeigh, J.S.C., Superior Court of New Jersey, Chambers 100, 71 Hamilton Street, Paterson, New Jersey 07505

ALSO AT 75 MAIDEN LANE, SUITE 303, NEW YORK, NEW YORK 10038 PHONE 212.812.2146 FACSIMILE 888.858.5840

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----------X

WELLS FARGO BANK, N.A.

Plaintiff,

-vs.-

Adel Micheal; et al,

Defendant.

----------X

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
HUDSON COUNTY

Docket No.: F-57093-09

CIVIL ACTION

OPPOSITION TO CORRECTED NOTICES OF INTENT TO FORECLOSE

TO: WELLS FARGO BANK, N.A.
c/o Doughlas J. McDonough, Esq.
Zucker, Goldberg & Ackerman, LLC
200 Sheffield Street, Suite 101
Mountainside, NJ 07092-0024
Attorneys for Plaintiff

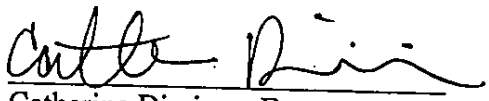
The undersigned, attorneys for defendant, Adel Micheal ("Defendant"), applying to the Superior Court of New Jersey, Chancery Division, Hudson County, to object to plaintiff's Corrected Notice of Intent to Foreclose in this action.

1. The amount required to bring the mortgage current as of September 17, 2012 listed on the Corrected Notice of Intent to Foreclose served on Defendant on August 14, 2012 failed to consider the 3 payments made by Defendant on June 8, 2010, July 18, 2010 and August 15, 2010 in the amount of $1,578.25 each. A copy of the monthly mortgage statement and checks is attached hereto as **Exhibit A.**

WHEREFORE, the Defendant for the foregoing hereby respectfully requests that the Court dismiss Plaintiff's Motion for Entry of Judgment.

Dated: September 19, 2012

GIRGES LAW PLLC
Attorneys for Defendant(s)



Catherine Dimiane, Esq.

CERTIFICATION

I hereby certify, pursuant to R. 4:5 1 that the matter in controversy herein is not the subject of any other action pending in any court or arbitration proceeding, nor is any other action or arbitration proceeding contemplated. I further certify that I am unaware of any other party who should be joined in this action.

Dated: September 19, 2012

GIRGES LAW PLLC
Attorneys for Defendant(s)

Catherine Dimiane, Esq.

VERIFICATION

STATE OF NEW JERSEY)
COUNTY OF MIDDLESEX)

Adel Micheal, being duly sworn, deposes and says:

I am one of the named defendants in the above captioned matter. I have read the foregoing Opposition to Motion for Entry of Default Judgment and know the contents thereof and the same is true to my own knowledge, except as to those matters stated to be upon information and belief, and as to those matters, I believe them to be true.

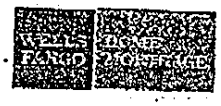
Adel Micheal

Adel Micheal

Sworn to before me
this 19th day of September, 2012.

Catherine Dimiane, Attorney at Law
State of New Jersey

EXHIBIT A
MONTHLY MORTGAGE STATEMENT AND CHECKS



Return Mail Operations
PO Box 14411
Des Moines, IA 50306-3411

Monthly Mortgage Statement

Statement Date 08/23/10
Loan Number 0171396468

Customer Service

Online
yourwellsfargomortgage.com

Fax
(866) 278-1179

Telephone
(866) 234-8271

Correspondence
PO Box 10335
Des Moines IA 50306

Hours of Operation
Mon - Fri, 6 AM - 10 PM
Sat, 8 AM - 2 PM CT

Payments
PO Box 11701
Newark NJ 07101

TTY Deaf/Hard of Hearing
(800) 934-9998

1AT 1693/017693/001693 062 01 ACNKK4 708
ADEL MICHEAL
689 AVENUE E
BAYONNE NJ 07002-4842

Important Messages

Summary

Payment (Principal and/or Interest, Escrow)	$3,315.90
Optional Product(s)	$0.00
Current Monthly Payment 09/01/10	**$3,315.90**
Overdue Payments 08/01/09 - 08/01/10	$42,389.16
Unpaid Late Charge(s)	$1,209.34
Other Charges	$15.00
TOTAL PAYMENT DUE 09/01/10	**$46,929.40**

Property Address
689 AVENUE E
BAYONNE NJ 07002

Unpaid Principal Balance	$304,216.62
(Contact Customer Service for your payoff balance)	
Interest Rate	7.625%
Interest Paid Year-to-Date	$1,934.72
Taxes Paid Year-to-Date	$6,545.82
Escrow Balance	$11,965.90-

Activity Since Your Last Statement

Date	Description	Total	Principal	Interest	Escrow	Late Charge	Other
08/23	PAYMENT		$264.05	$1,934.72	$997.54		$3,196.31-
08/20	PAYMENT	$1,578.25				Unapplied	$1,578.25
07/27	PAYMENT	$1,578.25				Unapplied	$1,578.25
06/15	PAYMENT	$1,578.25				Unapplied	$1,578.25
08/20	MTG INS PMT	$403.84-			$403.84-	PMI MORTGAGE INS CO	
08/10	CITY TAX PMT	$2,181.93-			$2,181.93-	BAYONNE CITY (1)	
07/20	MTG INS PMT	$403.84-			$403.84-	PMI MORTGAGE INS CO	
06/21	MTG INS PMT	$403.84-			$403.84-	PMI MORTGAGE INS CO	

Please detach and return with your payment

Loan Number	0171396468
Current Monthly Payment Due	$3,315.90
Total Payment Due 09/01/10	$46,929.40
After 09/16/10 Add Late Fee	$109.94
Total Amount Due After 09/16/10	$47,039.34

Check here and see reverse for address correction.

ADEL MICHEAL

1693/017693/001693 062 01 ACNKK4 708

WELLS FARGO HOME MORTGAGE
PO BOX 11701
NEWARK NJ 07101-4701

Please specify additional funds. Any additional funds not specified will be applied first to any outstanding charges.

Monthly Payment x pmt amt	A	$
Additional Principal	B	$
Late Charges	C	$
Other Charges	D	$
Additional Escrow	E	$
Total Amount Enclosed (Please do not send cash)	F	$

708 0171396468 2 10000331590034258446929404570506 00000000514896 ...

ADEL L MICHEAL
689 AVE E H.1
BAYONNE, NJ 07002-4842

199

8/15/2010

Pay to the Order of Wells Fargo Home Mortgage $ 1578.25

Fifteen Hundred, Seventy Eight and 25/100 Dollars

COMMUNITY BANK

For # 708-0171396468 Adel Micheal

⑆226071004⑆ 516500100960⑈ 0199

ADEL L MICHEAL
689 AVE E H.1
BAYONNE, NJ 07002-4842

187

7/18/2010

Pay to the Order of Wells Fargo Home Mortgage $ 1578.25

Fifteen Hundred, Seventy Eight and 25/100 Dollars

COMMUNITY BANK

For # 708-0171396468 Adel Micheal

⑆226071004⑆ 516500100960⑈ 0187

ADEL L MICHEAL
689 AVE E H.1
BAYONNE, NJ 07002-4842

173

6/8/2010

Pay to the Order of WELLS FARGO Home Mortgage $ 1578.25

Fifteen Hundred, Seventy Eight and 25/100 Dollars

COMMUNITY BANK

Return Mail Operations

Monthly Mortgage Statement