

RECEIVED

SEP 24 2012

SUPERIOR COURT
CLERK'S OFFICE

EDIL RODRIGUEZ
(PRO SE)
214 GIBBSBORO RD
CLEMENTON, NJ 08021-4133

<p>IN RE APPLICATION BY WELLS FARGO BANK NA TO ISSUE CORRECTED NOTICES OF INTENT TO FORECLOSE ON BEHALF OF IDENTIFIED FORECLOSURE PLAINTIFFS IN UNCONTESTED CASES</p>	<p>SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION PASSAIC COUNTY DOCKET NO: F-009564012 <u>CIVIL ACTION</u> OBJECTION TO ORDER TO SHOW</p>
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TO: REED SMITH LLP
136 MAIN ST, STE250
PRINCETON, NJ 08540
Attorneys for Plaintiff
WELLS FARGO NA

COMES NOW Defendant EDIL RODRIGUEZ, representing himself Pro Se, a lien holder to the premises known as 214 GIBBSBORO RD, CLEMENTON, NJ 08021-4133 and objects to the Plaintiff Wells Fargo's application to issue corrected notice of intention to foreclose and states as follows:

1. EDIL RODRIGUEZ, being duly sworn, deposes and says: I am a lien holder to the premises know as 214 GIBBSBORO RD, CLEMENTON, NJ 08021-4133 and I have interest in the premises to which Plaintiff's improper notice would prejudice my right to protect my lien and enforce my lien against the property.

2. I have personal knowledge of the facts stated herein, and I make this affidavit in opposition of Plaintiff Wells Fargo's *Order to Show Cause* to issue corrected notice of intent to foreclose

3. If it pleases the Court, my name is EDIL RODRIGUEZ and I am the owner and lien holder of the premises, and after experiencing a loss of income, I could no longer handle the mortgage payments *and have sought servicers, not lenders assistance.*

4. Further, I have never previously received a Notice of Intent to foreclose, in fact only upon receiving this recent order to show cause was I notified that the lender was required to give me such notification.

5. Also in the process I learned that I am in default and that without Excusable neglect and meritorious defense; I cannot join in my matter and defend my foreclosure.

6. As demonstrated by my inability to join in my matter and likely lose this house as a result, the rules of court are ones of *strict adherence* to the law should thus should also be applied to Plaintiff as such and for their failure to specifically follow the New Jersey Fair Foreclosure Act, their Order to Show Cause should be denied and my matter dismissed without prejudice.

NOTICE TO FORECLOSE / NJ FAIR FORECLOSURE ACT

7. The New Jersey Fair Foreclosure Act (FFA) requires lenders to Provide notice to borrowers prior to acceleration the debt or commencing the foreclosure action.

8. Suffice it to say the statute identifies the purpose in its name, *to make the foreclosure process more fair to the homeowner*, from banks who had skirted the foreclosure process in return for efficiency.

9. One such example has been the issuing of Notice of intent to foreclose or *acceleration letters* without the lenders information.

10. The Statute requires identification of the lender and as one can imagine that would be helpful to the homeowner like myself, not learned in law.

11. As a result, the homeowner like myself may be able to find help by dealing with lender directly and thereby creating a sense of accountability; *as opposed to the more common occurrence of homeowners thinking that the servicer is the lender.*

12. In this instance it is apparent that the Plaintiff did not issue proper notices as indicated by the NJ Fair Foreclosure Act and that only now at the eleventh hour after months of accumulating arrears and penalties against my lien interest, do they seek to remedy their defects; as a result this court should dismiss this matter without prejudice

THE PLAINTIFF DID NOT ADHERE TO NJ FFA AND AS PER GUILLUAME, THIS COURT HAS DISCRETION TO DISMISS

13. The defendant respectfully requests that the court deny the Plaintiff order to show cause and immediately dismiss without prejudice their matter. In a much awaited decision the Supreme Court clarified the issue regarding bank notices of intention to foreclose and in a unanimous decision the Supreme Court of New Jersey held that the

notices must include the name and address of both the loan owner and servicer. US Bank, N.A v. Guillaume, 209 N.J. 449 (2012).

14. The court also held that dismissal is not the sole remedy and that the court had discretion to also allow the Plaintiff to correct or impose another appropriate remedy. The remedy of dismissal without prejudice however still remains an option and under its discretion this Court may decide the most appropriate options. *Id.*

15. Essentially, the court left discretion for the courts and multiple options. In this instance the Plaintiff has never issued notice of intent to foreclose, much less a proper one which is exemplary of the rampant disregard for rule of law, homeowners rights and strict adherence to the procedural rules of the court by WELLS FARGO and their attorneys.

16. As it is well in this Courts discretion to dismiss this matter I respectfully object to the Plaintiff Order to Show Cause and move for immediate dismissal without prejudice of the matter instituted against myself EDIL RODRIGUEZ by Plaintiff WELLS FARGO BANK, NA.

WHEREFORE, it is respectfully requested that the Court deny WELLS FARGO corrected notice of Intention to foreclose and dismiss the matter against me without prejudice.

Passaic, New York
SEPTEMBER 22, 2012

Edil Rodriguez
EDIL RODRIGUEZ

CERTIFICATE OF SERVICE

I HEREBY CERIFY that on this 22 day of September 2012, a copy of the foregoing objection to be corrected notice of intention to foreclose was sent to the Superior Court Clerks Office, Foreclosure Processing, PO Box 971, Trenton, NJ 08625. A copy was also sent to mar S Medlodia Esq. care of Reed and Smith LLP, Princeton Forrestal Village, 163 main Street, Princeton, NJ 08540 and Judge McVeigh, JSC Superior Court of New Jersey chambers 10071 Hamilton street Paterson, NJ 07005 and Randy Bockenstedt Wells Fargo Home Mortgage 3480 State View Blvd MACD 3348-027 Fort Mill, SC 29715

Edil Rodriguez

EDIL RODRIGUEZ



3480 Stateview Blvd
MAC# D3348-027
Fort Mill, SC 29715

NJSA0814121799
EDIL RODRIGUEZ
148 06 115TH AVE
JAMAICA, NY 11436

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, this company has a security interest in the property and will only exercise its rights as against the property.

3480 Stateview Blvd
MAC# D3348-027
Fort Mill, SC 29715

Date: 8/14/2012

EDIL RODRIGUEZ
148 06 115TH AVE
JAMAICA, NY 11436

RE: America's Servicing Co. 106/1205321176
Mortgagor(s): EDIL RODRIGUEZ
Mortgaged Premises: 214 GIBBSBORO RD
CLEMENTON
NJ
08021-4133

NOTICE OF INTENTION TO FORECLOSE

Dear Borrower(s):

America's Servicing Co. services a mortgage (hereafter, the "Mortgage") in the original principal amount of \$ 165,000.00 on the residential property commonly known as 214 GIBBSBORO RD, CLEMENTON, NJ 08021-4133, which Mortgage was made on 5/25/2006.

Your Mortgage is now in default because you have not made the required payments. The total amount required to cure this default, in other words, the amount required to bring your mortgage current as of 9/17/2012 is as follows:

Monthly payments (principal, interest, and escrow) from 9/1/2009 are as follows:

Payments- Totaling	\$	61,327.71
Total Accrued Unpaid Late Charges (Monthly Late Charge \$ 53.28)	\$	1,491.84
Unapplied Funds	\$	0.00
Miscellaneous Fees	\$	622.24
Total Delinquency as of 8/14/2012	\$	63,441.79

Your Pre-Foreclosure Action Right to cure this Default

To avoid the possibility of acceleration, you must pay this amount plus any additional monthly payments, late charges and other charges that may be due under applicable law after the date of this notice and on or before 9/17/2012 in CERTIFIED funds, to:

Payments only address:

America's Servicing Co.
1200 W 7th Street
Suite L2-200
Los Angeles, CA 90017

Correspondence only address:

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

Please be advised that America's Servicing Co. cannot guarantee that payments received at the "correspondence only address" will be applied within the required timeframes.

If you do not cure this default and bring your account current by 9/17/2012, then America's Servicing Co. may take steps to terminate your ownership of the Property by starting a mortgage foreclosure action against you.

If you cure this default before the filing of the foreclosure action, America's Servicing Co. may not institute a foreclosure action against you for that default; your Mortgage will be reinstated to the same position as if the default had not occurred, and any acceleration of any obligation under the Mortgage or Note will be nullified as of the date of cure.

You have the right to transfer the property to another person subject to the Mortgage; that person will have the right to cure this default, subject to the Mortgage and the Note, and this Notice.

Your Post-Foreclosure Action Right to cure this Default

Even if America's Servicing Co. starts a mortgage foreclosure action against you, you shall still have the right to cure this default, de-accelerate and reinstate your Mortgage up to the time when a final judgment for foreclosure is entered. To do so, you must pay America's Servicing Co., at the address specified above, by cashier's check or certified check, all sums which would have been due in the absence of default and which are due at the time of payment including principal and interest payments, escrow payments and other necessary charges which come due prior to the date of payment and you must perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause, if any. In addition you must pay court costs, if any, and attorney(s) fees in an amount which shall not exceed the amount permitted under the Rules governing the Courts of the State of New Jersey, plus all contractual late charges, as provided for in the Note and Mortgage. You shall not be required to pay any separate charge, fee or penalty attributable to the exercise of your right to cure this default. This right to cure your default, de-accelerate and reinstate the Mortgage after a foreclosure action has been started may only be exercised by you once every 18 months. You have the right to bring a court action to assert the non-existence of a default or any other defense you may have to acceleration and sale.

If you cure the default after a foreclosure action has been started, America's Servicing Co. shall give written notice of the cure to the Court and, upon such notice, the Court shall dismiss the foreclosure action, without prejudice. Your Mortgage will be reinstated to the same position as if the default had not occurred and any acceleration of any obligation under the Mortgage and Note arising from the default will be nullified as of the cure date.

We urge you to immediately seek the advice of an attorney(s) of your own choosing concerning this residential mortgage default. If you are unable to obtain an attorney(s), you may communicate with the New Jersey Bar Association or the Lawyers Referral Service of the county where the property is located. If you are unable to afford an attorney(s), you may communicate with the Legal Services Office in the county where the property is located. These telephone numbers are listed on the attached sheet; they can also be found in the local telephone directory.

There may be available to you financial assistance for curing a default from programs operated by the state or federal government or non-profit organizations, if any, as identified by the Commissioner of Banking and Insurance. A list of such governmental and non-profit entities is enclosed. You may also wish to call the following numbers to ascertain whether you qualify for such assistance:

- * HUD Housing Counseling Service 1-800-569-4287
- * Veterans Affairs 1-800-827-1000
- * New Jersey Commissioner of Banking 1-609-292-7272
- * New Jersey Commissioner of Banking Hotline: 1-800-446-7467

If you disagree with America's Servicing Co.'s assertion that a default has occurred, or if you disagree with the correctness of America's Servicing Co.'s calculation of the amount required to cure this default, you may contact America's Servicing Co. at the following:

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

The lender of your loan is:

US BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR CSAB MORTGAGE-BACKED PASS-
THROUGH CERTIFICATES, SERIES 2006-2
60 Livingston Avenue
St. Paul, MN 55107-2292

Your right to cure this default, as provided in this Notice, is independent of any right of redemption or any other right or remedy under the common law, principles of equity, state or federal statute or rule of court. Financial Assistance for curing your default may be available. Attached you will find a list of possible programs.

Very truly yours,

America's Servicing Co.
Default Management Department

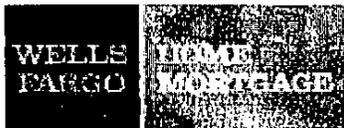
This communication is an attempt to collect a debt and any information obtained will be used for that purpose. However, if you have received a discharge of this debt in bankruptcy or are currently in a bankruptcy case, this notice is not intended as an attempt to collect a debt and, this company has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

Fair Foreclosure Act Notice of Intention to Foreclose - List of Entities Providing Assistance

The following is a list of governmental and non-profit entities that may provide financial assistance or counseling to borrowers in foreclosure.

<p>American Credit Alliance, Inc. 26 S. Warren St. Trenton, NJ 08608 609-393-5400</p>	<p>Atlantic Human Resources, Inc. 1 S. New York Ave. Atlantic City, NJ 08401 609-348-4131</p>	<p>Consumer Credit Counseling Service of Central New Jersey 1931 Nottingham Way Hamilton, NJ 08619 609-586-2574</p>
<p>Consumer Credit Counseling Service of New Jersey 185 Ridgedale Ave. Cedar Knolls, NJ 07927-1812 973-267-4324</p>	<p>Fair Housing Council of Northern New Jersey 131 Main St. Hackensack, NJ 07601 201-489-3552</p>	<p>Garden State Consumer Credit Counseling, Inc. 225 Willowbrook Road Freehold, NJ 07728 1-800-992-4557</p>
<p>Jersey Counseling & Housing Development, Inc. 29 S. Blackhorse Pike Blackwood, NJ 08012 856-227-3683</p>	<p>Jersey Counseling & Housing Development, Inc. 1840 S. Broadway Camden, NJ 08104 856-541-1000</p>	<p>Mercer County Hispanic Association 200 E. State St., 2nd Floor Trenton, NJ 08607 609-392-2446</p>
<p>Middlesex County Economic Opportunities Corporation 1215 Livingston Ave. North Brunswick, NJ 08902 732-790-3344</p>	<p>Monmouth County Human Services Housing Services Unit P.O. Box 3000 Freehold, NJ 07728 732-431-7998</p>	<p>NJ Citizen Action (main office/financial education center) 744 Broad St., Suite 2080 Newark, NJ 07102 973-643-8800 1-800-NJ-OWNER (loan counseling) 1-888-TAXES-11 (free tax preparation assistance)</p>
<p>NJ Citizen Action (Central Jersey) 85 Raritan Ave., Suite 100 Highland Park, NJ 08904 732-246-4772</p>	<p>NJ Citizen Action (South Jersey) 2 Riverside Drive, Suite 362 Camden, NJ 08103 856-966-3091</p>	<p>Ocean Community Economic Action Now, Inc. 22 Hyers St. Toms River, NJ 08753-0773 732-244-2351, ext. 2</p>
<p>Paterson Coalition for Housing, Inc. 262 Main St., 5th Floor Paterson, NJ 07505 973-684-5998</p>	<p>Paterson Task Force for Community Action, Inc. 155 Ellison St. Paterson, NJ 07505 973-279-2333</p>	<p>Puerto Rican Action Board Housing Coalition Unit 90 Jersey Ave. New Brunswick, NJ 08903 732-249-9700</p>
<p>Tri-County Community Action Agency, Inc. 110 Cohansey St. Bridgeton, NJ 08302 856-451-6330</p>	<p>Urban League for Bergen County 106 W. Palisade Ave. Englewood, NJ 07631 201-568-4988</p>	<p>Urban League for Essex County 508 Central Ave. Newark, NJ 07101 973-624-9535</p>
<p>Urban League of Union County 288 N. Broad St. Elizabeth, NJ 07208 908-351-7200</p>	<p>Homolessness Prevention Program New Jersey Department of Community Affairs (866) 889-6270*</p>	

*Basic eligibility is limited to: (a) single family owner/occupied dwellings with all those on the deed and mortgage occupying the house; (b) no more than one mortgage or lien encumbrance on the property; (c) no initiated or ongoing bankruptcy. Assistance will be in the form of a loan, and a lien will be placed on the property. The family must document the financial reason for nonpayment. At the time of the eligibility decision, the household must have and document income sufficient to support the household and repay the loan. There is a fee for the credit check and property search.



P.O. Box 1225
Charlotte, NC 28201-1225

Date

Customer's First Name I. Last Name
Co-Borrower First Name I. Last Name
Mailing Address
City, State Zip Code

RE: Wells Fargo Home Mortgage Loan Number
Mortgagor(s): Customer's First Name I. Last Name
Co-Borrower First Name I. Last Name
Mortgaged Premises: Property Address
Property City
Property State
Zip Code

NOTICE OF INTENTION TO FORECLOSE

Dear Borrower(s):

Wells Fargo Home Mortgage (hereafter, "Wells Fargo") services a mortgage (hereafter, the "Mortgage") in the original principal amount of \$ 0.00 on the residential property commonly known as (Property Address) (hereafter, the "Property"), which Mortgage was made on (Origination Date).

Your Mortgage is now in default because you have not made the required payments. The total amount required to cure this default, in other words, the amount required to bring your mortgage current as of (30 days from the date of letter) is as follows:

Monthly payments (principal, interest, and escrow) from (dates of default) are as follows:

Payments- Totaling	\$ 0.00
Total Accrued Unpaid Late Charges	\$ 0.00
(Monthly Late Charge \$ 0.00)	
Unapplied Funds -	\$ 0.00
Miscellaneous Fees	\$ 0.00
Total Delinquency as of (date of letter)	\$ 0.00

Your Pre-Foreclosure Action Right to cure this Default

To avoid the possibility of acceleration, you must pay this amount plus any additional monthly payments, late charges and other charges that may be due under applicable law after the date of this notice and on or before (30 days from date of letter) in CERTIFIED funds, to:

Payments only address:

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

Correspondence only address:

Gwendolyn Nesbit
Wells Fargo Home Mortgage
Address: 3480 State view Boulevard
MAC X7802-03H
Fort Mill, SC 29715
Phone Number: 1-800-416-1472

Please be advised that Wells Fargo Home Mortgage cannot guarantee that payments received at the "correspondence only address" will be applied within the required timeframes.

If you do not cure this default and bring your account current by (date of letter), then Wells Fargo may take steps to terminate your ownership of the Property by starting a mortgage foreclosure action against you.

If you cure this default before the filing of the foreclosure action, Wells Fargo may not institute a foreclosure action against you for that default; your Mortgage will be reinstated to the same position as if the default had not occurred, and any acceleration of any obligation under the Mortgage or Note will be nullified as of the date of cure.

You have the right to transfer the property to another person subject to the Mortgage; that person will have the right to cure this default, subject to the Mortgage and the Note, and this Notice.

Your Post-Foreclosure Action Right to cure this Default

Even if Wells Fargo starts a mortgage foreclosure action against you, you shall still have the right to cure this default, de-accelerate and reinstate your Mortgage up to the time when a final judgment for foreclosure is entered. To do so, you must pay Wells Fargo, at the address specified above, by cashier's check or certified check, all sums which would have been due in the absence of default and which are due at the time of payment including principal and interest payments, escrow payments and other necessary charges which come due prior to the date of payment and you must perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause, if any. In addition you must pay court costs, if any, and attorney(s) fees in an amount which shall not exceed the amount permitted under the Rules governing the Courts of the State of New Jersey, plus all contractual late charges, as provided for in the Note and Mortgage. You shall not be required to pay any separate charge, fee or penalty attributable to the exercise of your right to cure this default. This right to cure your default, de-accelerate and reinstate the Mortgage after a foreclosure action has been started may only be exercised by you once every 18 months. You have the right to bring a court action to assert the non-existence of a default or any other defense you may have to acceleration and sale.

If you cure the default after a foreclosure action has been started, Wells Fargo shall give written notice of the cure to the Court and, upon such notice, the Court shall dismiss the foreclosure action, without prejudice. Your Mortgage will be reinstated to the same position as if the default had not occurred and any acceleration of any obligation under the Mortgage and Note arising from the default will be nullified as of the cure date.

We urge you to immediately seek the advice of an attorney(s) of your own choosing concerning this residential mortgage default. If you are unable to obtain an attorney(s), you may communicate with the New Jersey Bar Association or the Lawyers Referral Service of the county where the property is located. If you are unable to afford an attorney(s), you may communicate with the Legal Services Office in the county where the property is located. These telephone numbers are listed on the attached sheet; they can also be found in the local telephone directory.

There may be available to you financial assistance for curing a default from programs operated by the state or federal government or non-profit organizations, if any, as identified by the Commissioner of Banking and Insurance. A list of such governmental and non-profit entities is enclosed. You may also wish to call the following numbers to ascertain whether you qualify for such assistance:

- | | |
|--|----------------|
| * HUD Housing Counseling Service | 1-800-569-4287 |
| * Veterans Affairs | 1-800-827-1000 |
| * New Jersey Commissioner of Banking | 1-609-292-7272 |
| *New Jersey Commissioner of Banking Hotline: | 1-800-446-7467 |

If you disagree with Wells Fargo's assertion that a default has occurred, or if you disagree with the correctness of Wells Fargo's calculation of the amount required to cure this default, you may contact Wells Fargo at the following:

Gwendolyn Nesbit
Wells Fargo Home Mortgage
Address: 3480 Stateview Boulevard
MAC X7802-03H
Fort Mill, SC 29715
Phone Number: 1-800-416-1472

The lender of your loan is:

(Holder of the Mortgage 1) position 1184-1383 (10 digit) position 1181-1380 (7 digit)
(Holder of the Mortgage Address 1) position 1384-1633 (10 digit) position 1381-1630 (7 digit)
(Holder of the Mortgage City 1) position 1634-1654 (120 digit) position 1631-1651 (7 digit)
(Holder of the Mortgage State 1) position 1655-1656 (10 digit) position 1652-1653 (7 digit)
(Holder of the Mortgage Zip1) position 1657-1661 (10 digit) position 1654-1658 (7 digit)

Your right to cure this default, as provided in this Notice, is independent of any right of redemption or any other right or remedy under the common law, principles of equity, state or federal statute or rule of court. Financial Assistance for curing your default may be available. Attached you will find a list of possible programs.

Very truly yours,

Wells Fargo Home Mortgage
Default Management Department

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, this company has a security interest in the property and will only exercise its rights as against the property.

8/14/2012

EDIL RODRIGUEZ
148 06 115TH AVE
JAMAICA, NY 11436

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 EDIL RODRIGUEZ:

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
- Count 12 - Federal Deposit Guaranty Insurance Corporation

- Count 13 - Federal Home Loan Mortgage Corporation
- Count 14 - Federal National Mortgage Association
- Count 15 - Federal Home Loan Bank of Chicago
- Count 16 - FTN Financial
- Count 17 - GE Capital Mortgage Services, Inc.
- Count 18 - GMAC Bank
- Count 19 - HSBC Bank, N.A.
- Count 20 - Hudson City Savings Bank
- Count 21 - Investors Savings Bank
- Count 22 - JP Morgan Chase Bank
- Count 23 - LaSalle Bank, N.A.
- Count 24 - Lehman Brothers
- Count 25 - LEX Special Assets
- Count 26 - MidFirst Bank
- Count 27 - New York Life Assurance and Annuity Corporation
- Count 28 - PNC Bank
- Count 29 - Residential Accredited Loans, Inc.
- Count 30 - Riggs Real Estate Investment Corporation
- Count 31 - UBS Bank
- Count 32 - United States Department of Housing and Urban Development
- Count 33 - U.S. Bank, N.A.
- Count 34 - Wilmington Trust Company

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 the following America's Servicing representative who can assist you with locating the information about your foreclosure action:

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

Information About the Corrected Notice of Intention to Foreclose

Also enclosed with this letter is the corrected Notice of Intention 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 Intention to Foreclose, the foreclosure action against you will proceed.

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 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. McIodia, 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.