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SUPERIOR COURT
CLERK'S OFFICE

NILGUN GEDELEC
(Your Name(s))

10 Hidden Lake Dr. N. Brunswick, NJ 08902
(Your Mailing Address)

732-305-6977
(Your Daytime Telephone Number)

Defendant(s) *Pro Se*

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION - GENERAL EQUITY
Middlesex COUNTY
(County where the property is located)

Docket No F- 009564-12

Reed Smith LLP, Wells Fargo Bank N.A.
(Name of company or bank that filed the foreclosure complaint)

Plaintiff(s),

vs.

Nilgun Gedelec
(Name of first defendant listed on the complaint)

Defendant(s),

CIVIL ACTION

ANSWER

Nilgun Gedelec
(Insert your name(s))

residing at

10 Hidden Lake Dr.
(Insert your street address)

in the City of N. Brunswick, County of 0 Middlesex and State of NJ,
by way of Answer to the plaintiff's complaint herein, says:

AS TO THE FIRST COUNT:

Defendant admits/denies or is without knowledge or information sufficient to form a belief as to the truth of the allegation of each of the following paragraphs of the first count of the complaint as follows:

I, the Defendant, as and for my Answer to the complaint, state as follows
1. I admit that I signed a note and mortgage
2. I am without sufficient knowledge as to whether the amounts demanded as amount due are accurate.
Therefore we deny the allegation.

FORM A

AS TO THE SECOND COUNT:

Defendant admits/denies or is without knowledge or information sufficient to form a belief as to the truth of the allegation of each of the paragraphs of the second count of the complaint as follows:

3. The bank promised to send me package which contains a (government supported application) for a loan modifications. They don't send it.

4. I prepared paperworks for a loan modification that the bank sent but they didn't ever consider and gave an answer to my application.

[Note: Defendants must include all separate (see R. 4:5-3) and affirmative defenses (see R. 4:5-4), raise them by motion as permitted in R. 4:6-2, or otherwise raise the defense in a timely manner or those separate defenses and affirmative defenses are waived.]

FIRST SEPARATE DEFENSE

Nilgun Gedelec

SECOND SEPARATE DEFENSE

FORM A

THIRD SEPARATE DEFENSE

[Empty box for Third Separate Defense]

FIRST AFFIRMATIVE DEFENSE

I deny that the plaintiff should be able to foreclose on my home for the following reasons. I have requested that the lender allow me to participate in the borrower assistance programs currently available to me.

SECOND AFFIRMATIVE DEFENSE

I, the defendant, respectfully request the court dismiss the complaint or in the alternative order mediation in the above referenced case and or allow me to opportunity to further pursue a loan work out with the lender as an alternative to a final judgment of Foreclosure Sale of the property located at

10 Hidden Lake Dr N. Brunswick NJ 08902

Wherefore, Defendant demands judgment:

- A. Dismissing the plaintiff's complaint;
- B. Awarding defendant costs incurred in defending against this action; and
- C. For such other relief as the court deems just and equitable.

Dated: 09.16.2012

D. Gedelev
Signature
Nilgun Gedelev
Print or Type Name

Dated: _____

Signature

Print or Type Name

FORM A

CERTIFICATION PURSUANT TO RULE 4:5-1

The matter in controversy is not the subject of any other action pending in any other New Jersey court. There are no pending arbitration proceedings. No other action or arbitration proceedings are contemplated. No non-party is known who would be subject to inclusion or joinder in this case because of potential liability.

Dated: 09-16-2012

Signature N. Gedelec

Print or Type Name Nilgun Gedelec

Dated:

Signature

Print or Type Name

CERTIFICATION OF MAILING ANSWER TO COURT AND TO THE ATTORNEY FOR THE PLAINTIFF

I hereby certify that:

1. A copy of the within Answer was filed within the time prescribed by the Rules of Court.

2. On 09-16-2012 I, the undersigned, mailed to Mark Melodia Esquire at Reed Smith LLP (insert the name of the plaintiff's attorney) Attorneys for Plaintiff, at Princeton Forrestal Village, 136 main street Princeton, NJ 08540 (insert the address of the plaintiff's attorney)

by regular mail, a true copy of the within Answer.

I hereby certify that the statements made by me in this document are true. I am aware that if any are willfully false, I am subject to punishment.

Dated: 09-16-2012

Signature N. Gedelec

Print or Type Name Nilgun Gedelec

Dated:

Signature

Print or Type Name