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October 4, 2012

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SUPERIOR COURT
 CLERK'S OFFICE

**DENBEAUX
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Via NJ Lawyers Service

The Honorable Margaret Mary McVeigh, JSC
 Superior Court of New Jersey
 71 Hamilton Street
 Patterson, NJ 07505

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: F-009564-12

Dear Judge McVeigh;

As Your Honor is aware, this law firm represents several defendant homeowners made part of the pending Order to Show Cause referenced above. I write this letter out of a general concern for communications procedure within the motion process.

To date, this law firm, Denbeaux & Denbeaux has received no communications from the Court or Plaintiff regarding the Order to Show Cause. My clients have been directly served with all relevant communications. This is likely a violation of R.P.C. 4.2. and R. 1:6-3(c) which states "For purposes of this rule, service of motion papers is complete only on receipt at the office of adverse counsel..."

By filing objections to the Order to Show Cause, this office has made its representation clear. After becoming aware that this firm represents several homeowners subject to the motion, Plaintiff again served papers directly on the clients but not this firm. I have been made aware that the October return date of the Order to Show Cause has been adjourned to November 1. However, notice was provided to me by clients and not the Court or adversary. But for particularly diligent clients, I would not have known of the adjournment.

This office represents approximately 150 homeowners subject to foreclosure proceedings. I have been made aware of roughly 12 clients who are made part of this action. It is my belief that at least 6 of these clients were wrongly included in the motion because they currently have a contested action and/or have had their respective foreclosure action dismissed. That means 4% of my client base has been wrongly made part of the Order to Show Cause. There are a total of 3,790 homeowners made part of this motion. If the same 4% rate applies to the group on the whole, then approximately 152 homeowners have been wrongly made part of the Order to Show Cause.

The potential errors involved in this motion will be greatly exacerbated by the failure to communicate with counsel for Defendants. I have personally spoken with a representative at the Office of Foreclosure by phone and the scco foreclosure mailbox@judiciary.state.nj.us email. I have been informed that all communications presently have been directed at the homeowners and there was no anticipated resolution to the lack of service on counsel. I anticipate that there are other homeowners among the 3,790 who are represented by counsel. I further anticipate that they too are not being served with notices and motion correspondence relating to the Order to Show Cause.

Respectfully, it is requested that some action is taken by the Court to ensure that any counsel filing an objection on behalf of a homeowner be served with communications concerning the Order to Show Cause. Copies of this letter are being simultaneously sent to Mark Melodia, Randy Bockenstedt, the Office of Foreclosure, and Peggy Jurow.

Thank you for your kind consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam Deutsch". The signature is fluid and cursive, with a large initial "A" and a long, sweeping underline.

Adam Deutsch, Esq.

Denbeaux & Denbeaux

Cc: Mark Melodia
Peggy Jurow
Randy Bockenstedt
Office of Foreclosure