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OCT 12 2012

SUPERIOR COURT
CLERK'S OFFICE

RICHARD DOMOND
4 SOUTH ORANGE AVENUE
SOUTH ORANGE, NJ 07079
DEFENDANT, PRO SE

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION
PASSAIC COUNTY

**IN RE APPLICATION BY WELLS
FARGO BANK, N.A. TO ISSUE
CORRECTED NOTICES OF INTENT
TO FORECLOSURE ON BEHALF OF
IDENTIFIED FORECLOSURE PLAINTIFFS
IN UNCONTESTED CASES**

DOCKET NO. F-009654-12

OPPOSITION TO
ORDER TO SHOW CAUSE

I, RICHARD DOMOND, recipient of applicant's Order to Show Cause and defendants object to Wells Fargo Bank, N.A. order to show cause for the following reason:

Objection: I, Richard Domond, is not properly within the class of homeowners identified by the Order to Show Cause.

The Order to Show Cause was authorized specifically for pre-judgment foreclosure cases.

Objection: Notice of Intent deficiency issues raised in application filed under the foreclosure dockets.

Counsel has filed objections to the sufficiency of the notices of intent filed with the county in pending actions. Counsel has properly brought the issue before the chancery Court and has been litigating in search of a remedy appropriate to the circumstances of the case. To permit Wells Fargo to correct the Notices of Intent at this point would be fundamentally unfair to the homeowners, as they have raised the issue with the court and are seeking reconsideration/appeal of the decision. Permitting the proposed corrections at this juncture strips the homeowners of the rights they have asserted in presenting the issue within the foreclosure action.

Objection: Wells Fargo did not attach the Complaint to the issued notices and I reject such improper service.

Contrary to Rules of Court R. 4:67-2 and R. 4:52-1(b), a copy of the complaint was not attached to the explanatory letter served upon the defendants subject to the Order to Show Cause, despite the letter's reference to the complaint. Such absence is confusing to defendants and creates imperfect service. Applicants were excused from serving the exhibits to the complaint on every homeowner, but they were not excused from serving the complaint to all. As such, Applicant did

not serve the complaint in compliance with the court rules, proper service of the order to Show Cause has not been effectuated, and the fundamental due process rights of the homeowners have been violated.

Objection: Wells Fargo did not properly serve the identified homeowners.

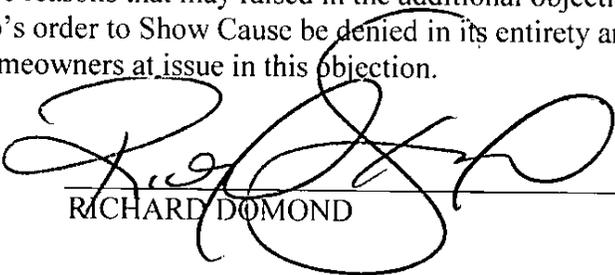
Objection: Wells Fargo did not properly identify the parties and actions named as subject to the Order to Show Cause.

Objection: The language of the proposed notice of intent to foreclosure is misleading.

Objection: Wells Fargo has not provided reliable contact information for questions and concerns.

For the reasons stated above and for those reasons that may be raised in the additional objections, it is respectfully requested that Wells Fargo's order to Show Cause be denied in its entirety and/or denied as to the specifically identified homeowners at issue in this objection.

Date: 10-05-2012


RICHARD DOMOND

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PLAINTIFFS**

AFFIDAVIT

I Richard Domond, of Full age, hereby depose and say:

I am the named defendant in the foregoing action. the subject property is located at 4081 Bayberry Court, Monmouth Junction, NJ 08852 (the "Property").

I received correspondence from America's Servicing Company ("ASC) dated August 14, 2012. The ASC correspondence included an introductory letter, a Notice of Intention to Foreclosure ("NOI") and an Order to Show Cause ("OSC")

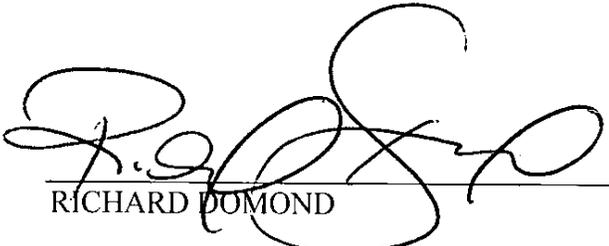
Pursuant to the instruction in the introductory letter and the NOI, I proceeded to contact the appropriate person stated in the letter, as I had additional questions concerning the amount due and actual procedures to follow.

Contrary to the instruction on the introductory letter and the NOI, all of the efforts I put in to try to talk to someone to get a better understanding of what was going on and how to proceed went down the tube instead I was given the run around and wasted a tremendous amount of time on hold...

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

Sworn and Subscribed
Before me on this 2nd
Of October 2012

BRUNO JEAN CHARLES
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 10/20/2014


RICHARD DOMOND

CERTIFICATION OF SERVICE

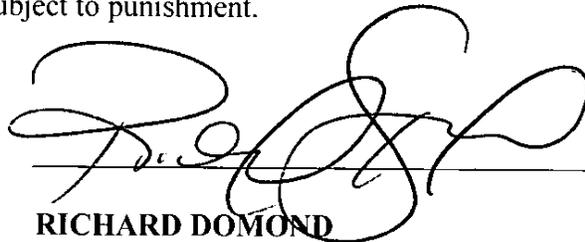
I hereby certify that on, I sent the original of the within opposition to Wells Fargo Bank, N.A. Order to show Cause to be filed with the Clerk of the Superior Court of New Jersey via Certified Mail and to the following parties by regular and certified mail.

Mark Melodia, Esq.
REED SMITH, LLP
Princeton Forrestal Village
136 Main Street
Princeton, NJ 08540

Honorable Margaret M. McVeigh, P.J. Ch.,
Superior Court of New Jersey
71 Hamilton Street, Chambers 100
Patterson, NJ 07505

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

Dated: 10-05-2012



RICHARD DOMOND

MELANDE JEAN-CHARLES
NOTARY PUBLIC
STATE OF NEW JERSEY
My Comm. Expires 12/31/13

RICHARD DOMOND
4 SOUTH ORANGE AVE, #265
SOUTH ORANGE, NEW JERSEY 07079

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VIA REGULAR AND CERTIFIED MAIL

October 4, 2012

Honorable Margaret M. McVeigh, P.J., Ch.
Passaic County Superior Court of New Jersey
77 Hamilton Street
Patterson, New Jersey 07501

Re: In Re Application by Wells Fargo Bank, N.A. to issue Corrected Notice of intent to Foreclose on behalf of Identified Foreclosure Plaintiffs in Uncontested Cases.

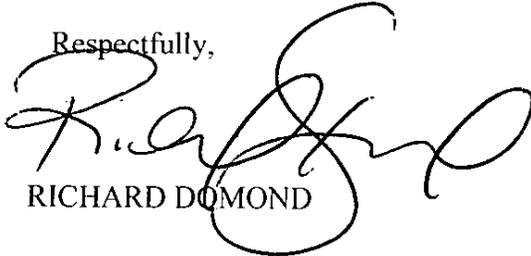
Order to Show Cause Docket No.: F: 009564-12

Dear Judge McVeigh:

I am the defendant, Richard Domond in the above captioned matter. Enclosed, please find the objection to Wells Fargo Bank, N.A. Order to Show Cause and Objection to the Proposed Corrective Notice of Intent to Foreclosure which is being filed.

Thank you for your attention to this matter.

Respectfully,



RICHARD DOMOND

CC: Mark Melodia, Esq.

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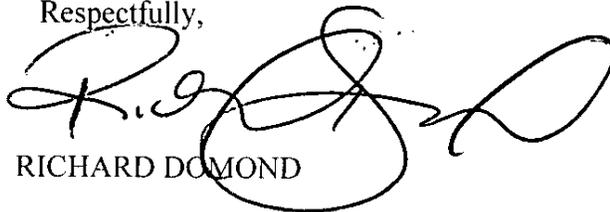
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