
BONNIE JERBAS, ESQ.
ATTORNEY AT LAW

APPOINTMENTS & CLIENT MEETINGS AT
26 PARK STREET, 2d FLOOR
MONTCLAIR, NJ 07042

100 PARK STREET, SUITE 3
MONTCLAIR, NEW JERSEY 07042

TEL 973 459-5923
FAX 877-296-3322

Bonnie HouseCallAttorneys@gmail.com

October 15, 2012

VIA UPS OVERNIGHT DELIVERY

Superior Court Clerk's Office
Foreclosure Processing Services
Attention: Objection to Notice of Intention to Foreclose
P.O. Box 971
Trenton, NJ 08625

RECEIVED

OCT 18 2012

**SUPERIOR COURT
CLERK'S OFFICE**

**RE: In re Application of Wells Fargo Bank, N.A. to Issue Corrected Notices
Of Intent to Foreclose
Docket No.: F-009594-12**

**US Bank National Association, as Trustee for WMBS 2007-006
vs. Robert Stephen Brown
Docket No.: F-4262-09**

Dear Sir or Madam:

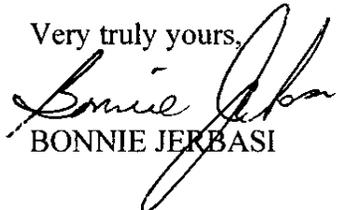
I represent Defendant Robert Stephen Brown in the captioned matter.

Enclosed herewith is an original and two (2) copies of Defendant's opposition to Plaintiffs' Application to Issue Corrected Notices of Intent to Foreclose.

Kindly file same and return a filed copy to the undersigned in the enclosed self-addressed stamped envelope provided.

Thank you for your cooperation in this matter.

Very truly yours,


BONNIE JERBAS

cc: Hon. Judge Margaret McVeigh, J.S.C.
Mark S. Melodia, Esq. Wells Fargo American Servicing Co.

BONNIE JERBASI, ESQ.
100 PARK STREET, SUITE 3
MONTCLAIR, NJ 07042
(973) 459-5923
Fax: (877) 296-3322
Attorney for Robert Brown

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SUPERIOR COURT
CLERK'S OFFICE

US Bank National Association, as
Trustee for WFMB 2007-006,

Plaintiff,

v.

Robert Stephen Brown and Diane
Brown, et al.,

Defendants.

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION
BERGEN COUNTY
CIVIL ACTION
DOCKET NO.: F-4262-09

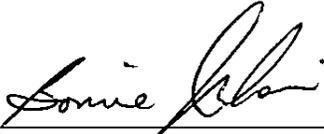
Civil Action

**OBJECTION TO
PLAINTIFFS' MOTION**

The defendant, Robert Stephen Brown, individually, by and through his attorney,
by way of opposition to Plaintiffs' Application to Issue Corrected Notices of Intent to
Foreclose, says:

1. Defendant was never served with a Notice of Intent to Foreclose in the captioned matter.
2. Defendant was never served with a Foreclosure Complaint in the captioned matter.
3. Defendant is divorced from co-defendant Diane Brown.
4. Diane Brown is not represented in this matter by counsel.
5. Plaintiffs herein failed to comply with New Jersey Fair Foreclosure Act in all aspects of its collection efforts.

6. Defendant made several attempts to modify the mortgage on the property that is the subject of this Complaint.
7. Wells Fargo, the mortgage holder, has failed to act in good faith throughout the modification and negotiation process.
8. In fact, Wells Fargo has been negligent in its dealings with Defendant and has prevented Defendant from fulfilling the requirements of his divorce agreement in re-Deeding the subject property.
9. Due to Wells Fargo's actions/inactions, Defendant is at risk of losing his home.
10. Since Plaintiffs herein have failed to comply with the Fair Foreclosure Act, the Rules regarding process of service, the statutes governing foreclosures in this State and other regulations, it is respectfully submitted that Wells Fargo be ordered to refile the Foreclosure Complaint and properly serve Defendant.
11. Once properly served the Defendant can file an Answer and/or request mediation through the New Jersey Foreclosure Mediation program.
12. Therefore, it is respectfully submitted that Plaintiffs' Motion be denied, the Complaint herein be dismissed and for such other relief as the Court deems equitable and just.


BONNIE JERBASI

Dated: October 12, 2012