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OCT 18 2012

**SUPERIOR COURT
CLERK'S OFFICE**

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

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
: PASSAIC COUNTY
: DOCKET NO. F-009564-12
:
: Civil Action
:
: OBJECTION OF JOHN H. FORD AND
: TOKUNBO O. FORD TO WELLS FARGO'S
: APPLICATION TO ISSUE CORRECTED
: NOTICES OF INTENT TO FORECLOSE

COMES NOW John H. Ford and Tokunbo O. Ford, by and through their undersigned counsel, and file this Objection to the application by Wells Fargo to issue Corrected Notices of Intent to Foreclose and state as follows:

1. John H. Ford and Tokunbo O. Ford ("FORD") are Defendants in the action entitled U.S. BANK NATIONAL ASSOCIATION, As Trustee for the Structured Asset Investment Loan Trust, 2005-9, Plaintiff v. John H. Ford, et al., Defendants, pending in the Superior Court of New Jersey Chancery Division, Burlington County, Docket No. F-03481-10 ("FORD ACTION").
2. On February 27, 2012 the Supreme Court of New Jersey decided U.S. Bank, N.A. v. Guillaume, 2009 N.J. 449 (2012), and held that the Fair Foreclosure Act requires strict adherence to the notice requirements set forth in N.J.S.A. 2A:50-56(c) for all Notices of Intent to Foreclose.
3. The Notice of Intent to Foreclosure issued in the aforesaid pending action against Ford is wholly insufficient, void and in violation of the Guillaume decision.

4. The Notice of Intent to Foreclose is further void and legally deficient in that all of the amounts claimed to be owed to Plaintiff from Defendants as stated further on Page 1 of the Amended Notice of Intent to Foreclose are excessive and well in excess of the amounts, if any, that may be legally owed to Plaintiff

5. Based upon the Guillaume decision, Equity and Fairness dictate that the Notice of Intent to Foreclose be struck and that the FORD ACTION be dismissed.

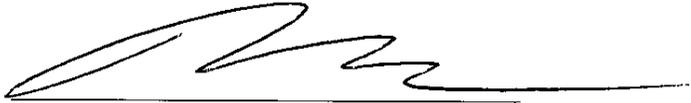
6. Furthermore, the Order entered by the Court on April 4, 2012 which authorizes the Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, and the Hon. Paul Innes, P.J.Ch., Mercer Vicinage to entertain Summary Actions by Orders to show cause is limited to Uncontested Residential Foreclosure Actions.

7. However, in the FORD ACTION, the Defendants filed a Contesting Answer and subsequently hired undersigned counsel for further representation in said action. In that regard, FORD, by undersigned counsel, formally opposed Plaintiff's Motion for Summary Judgment by the filing of a legal Memorandum of Law and supporting documents and ultimately after hearing argument by Plaintiff's counsel and undersigned counsel for FORD, the presiding Judge in the FORD ACTION denied Plaintiff's Motion for Summary Judgment. Based upon the foregoing, the FORD ACTION is not uncontested and therefore the Court does not have the authority to permit the Plaintiff to correct the Notice of Intent to Foreclose that was sent to FORD.

WHEREFORE, John H. Ford and Tokunbo O. Ford request this Court to deny the Application by Wells Fargo Bank, N.A. to issue a corrected Notice of Intent to Foreclose upon John H. Ford and Tokunbo O. Ford in the action entitled U.S. BANK NATIONAL ASSOCIATION, As Trustee for the Structured Asset Investment Loan Trust, 2005-9, Plaintiff v.

John H. Ford, et al., Defendants, pending in the Superior Court of New Jersey Chancery Division, Burlington County, Docket No. F-03481-10.

Date: October 17, 2012



Mark G. Carusillo, Esq.

CERTIFICATION OF SERVICE

I, Mark G. Carusillo, Esq., hereby certify that on this 17th day of October, 2012, I filed an original and one copy of the within Objection with Clerk of the Superior Court, Foreclosure Processing Services, Attention: Objection to Notice of Intention to Foreclose, 25 W. Market Street, 6th Floor, North Wing, Trenton, NJ 08611 via Federal Express Priority Overnight Delivery, Tracking No. 8770 3809 6643; I also caused a true copy of the above-named document(s) to be sent via Federal Express Priority Overnight Delivery to Mark Melodia, Esq., Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, NJ 08540, Tracking No. 8770 3809 6665, and to Judge Margaret Mary McVeigh at the Superior Court of New Jersey, Passaic County Courthouse, Chambers 100, 71 Hamilton Street, Paterson, NJ 08505, Tracking No. 8770 3809 6654.



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Via Federal Express Priority Overnight Delivery

October 17, 2012

Clerk of the Superior Court
Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclose
25 W. Market Street, 6th Floor
Trenton, NJ 08611

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 No.: F-009564-12

Dear Sir/Madam:

Enclosed herewith with regard to the above referenced matter, please find the following:

1. Objection of John H. Ford and Tokundo O. Ford to Wells Fargo's Application to Issue Corrected Notices of Intent to Foreclose.

Kindly return a filed stamped copy of the aforesaid pleading to my office in the enclosed self addressed envelope.

Very truly yours,



Mark G. Carusillo
MGC/mgw
Enclosures as noted.