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SUPERIOR COURT
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John T. Doyle, ESQ
(Your Name(s))

378 Schuyler ave
(Your Mailing Address)

Kearny, NJ 07032

908-787-2638
(Your Daytime Telephone Number)

Defendant(s) ~~Pro Se~~ Attorney For Defendant Barry Thompson

BAC Home Loans
(Name of party that filed foreclosure complaint)

Plaintiff(s) AND Bank of America NA

Vs.

Barry Thompson
(Name of first defendant listed on the complaint)
Defendants(s)

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION - GENERAL EQUITY

ESSEX & Union Counties COUNTY
(County where property is located, or "Mercer" for an objection to the Order to Show Cause)

Docket No F-DD9564-12
(see instructions for the correct docket number to use)

Objection to: (check one)

Order to Show Cause

Corrected Notice of Intention to Foreclose →
F-057623-10
F-050149-10
F-053860-10

I/We Barry Thompson, the defendant(s) in the foreclosure matter
(filing party or parties)

F-057623-10, F-050149-10, F-053860-10, hereby object
(caption and docket number if different from above)

to the Plaintiff's filing of: an Order to Show Cause

a corrected Notice of Intention to Foreclose

for the following specific reasons:

Describe specific objections in numbered paragraphs.

Please attach additional pages if necessary.

① I ~~hereby~~ object to the order to show cause filed by Wells Fargo for the following reasons; the prior NOI was held by the Supreme Court to be deficient and in violation of the Fair Foreclosure Act. Thus, my due process rights have been violated in my uncontested, pending foreclosure actions which have docket numbers listed above.

①. If Defendant had known about the deficiency at the time he had to file his Answer, he would have been able to file a contested Answer and corresponding Counterclaim And thereby protect his rights.

②, I hereby object to the corrected NOI For the same reasons set forth in paragraph one. Plaintiff did not abide by correct procedural requirements when they started these foreclosure actions against this defendant. To allow plaintiffs to correct their NOI now is improper and violates Defendants' constitutional rights.

③ In the event the Court allows Plaintiff to serve this corrected NOI on Defendant, Plaintiff should be ordered to start the foreclosure process anew by refileing their complaints in these uncontested matters and allow Defendant to file amended, contesting Answers and Counterclaims. As an alternative remedy, plaintiff should be ordered to offer these Defendants a reasonable mortgage modification.

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.

Date: 10/18/12

Signature John T. Doyle, Esq.
John T. Doyle, Esq.
(print or type your name)
Attorney for Barry
Thompson

CERTIFICATION OF SERVICE

I hereby certify that on October 18, 2012 sent my objection to the following parties by:
(date mailed)

regular mail, certified mail other _____

(Check which mailing method you chose. If you sent it by both regular and certified mail, check both, list each party to the lawsuit, send your opposition to the attorney if the party is represented by counsel; if the party is *pro se* you may send the papers directly to that individual).

Name MARK S. Melodia esq. Name _____

Address Reed, Smith LLP Address _____

136 Main St
Princeton, NJ 08540

Attorney for plaintiff Attorney for _____

Date: 10/18/12

Signature John T. Doyle
John T. Doyle, Esq.
(print or type your name)
Attorney for Barry Thompson