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SUPERIOR COURT
CLERK'S OFFICE

October 11, 2012

Superior Court of New Jersey
Foreclosing Processing Services
Attn: Objection to Notice of Intention to Foreclose
P.O. Box 971
Trenton, New Jersey 08625

Re: In re Application by Wells Fargo, N.A. to Issue Corrected Notices of Intent to Foreclose on Behalf of Identified Foreclosure Plaintiffs in Uncontested Cases

Docket No. F-009564-12 (Passaic County)

Certification in Opposition to Order to Show Cause

U.S. Bank National Ass'n as Trustee vs. Katcharava, et al
Docket Number F-45005-08 (Morris County - Contested Case)

Dear Clerk of the Court

I am writing to your office with regard to the above matters captioned above. The first which is pending before the Hon. Margaret Mary McVeigh. My September 20 Certification of Opposition to the Order to Show Cause is enclosed. The second case involved a matter in which I filed a Answer to contest the foreclosure. While a Summary Judgment was granted, it is obvious that it was granted on erroneous grounds that dealt with an improper assignment of mortgage, a subprime predatory securitized loan with Mortgage Electronics Registration Systems, Inc robo signing (something the Court did not address previously).

The loan is a fraud. It is securitized and failed to comply with the law. The assignment is void. Plaintiff does not have legal standing. The Summary Judgment should be set aside and another hearing should be permitted on the issue. The Plaintiff and its servicers have failed to allow me a loan modification even though I have proved I have sufficient income four years.

A check of the Master File in Trenton contains my contested Answer. There are no documents from the Plaintiff in the underlying foreclosure case which supports the granting of the Summary Judgment, it was made in error and if necessary, I will file an appropriate application with said Court in light of these developments.

Very truly,


Vaktang Katcharava

Reed Smith, LLP
attn: Mark S. Melodia, Esq.
Hon. Margaret M. McVeigh, J.S.C.

September 20, 2012

Superior Court of New Jersey
Clerk, Passaic County Chancery Division
77 Hamilton Street
Paterson, New Jersey 07505

Re In re Application by Wells Fargo, N A to Issue Corrected Notices of Intent to
Foreclose on Behalf of Identified Foreclosure Plaintiffs in Uncontested Cases

Docket No. F-009564-12

Certification in Opposition to Order to Show Cause

Dear Clerk of the Court.

I am writing to your office with regard to the above matter captioned above which is pending before the Hon Margaret Mary McVeigh. My Certification of Opposition to the Order to Show Cause is enclosed

The loan is a fraud. It is securitized and failed to comply with the law. The assignment is void. Plaintiff does not have legal standing

Very truly,


Vaktang Katcharava

Reed Smith, LLP

Vaktang Katcharava,
Veronica Kharchilava
39 Alabama Avenue
Lake Hopatcong, New Jersey 07849
973-234-8944

IN RE APPLICATION BY WELLS
FARGO BANK, NA 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 009564-12

CIVIL ACTION

CERTIFICATION IN SUPPORT OF OBJECTION
TO PLAINTIFF'S ORDER TO SHOW CAUSE

I am Vaktang Khatcharava, and I hereby certify that the following statements made by me are true to the best of my information, knowledge and belief; and, I understand that if I make any statement that is willfully false, I may be subject to penalty of law

1 I was sent an Order to Show Cause from the Plaintiff's attorney, Reed Smith LLP. It said that it was addressed to all uncontested foreclosures. My case is a contested foreclosure.

2. I filed a contesting Answer, Docket Number F-45005-08, U S Bank National Ass'n as Trustee vs Katcharava, et al. It is still pending in Morris County

3 To the best of my knowledge, this is a "contested" case and not an uncontested case

4 I oppose the application because the Plaintiff has not proven that it has legal standing to bring the matter. The loan is securitized, not in compliance with federal laws governing such transactions and the assignment is void for non-compliance as well I was not aware of this until this past month

September 20, 2012

Respectfully submitted

Vaktang Katcharava 

Veronica Kharchalava 