

OCT 23 2012

SUPERIOR COURT
CLERK'S OFFICE

LETTER OF OBJECTION FROM:	
FROM	TRACY COOPER 1229 Oxford Avenue Plainfield, NJ 07062

October 18, 2012

LETTER OF OBJECTION TO:		
DOCKET NO: F-009564-12 – Civil Action & Amended Verified Complain		
TO	REED SMITH LLP Formed In The State Of Delaware Mark S. Melodia, Esquire, Reed Smith, LLP Mark S. Melodia, Esquire Diane A. Bettino, Esquire 136 Main Street, Suite 250 Princeton, NJ 08540 Telephone: 609-987-0050	JUDGE McVEIGH J.S.C. SUPERIOR COURT OF NEW JERSEY CHAMBERS 100 71 HAMILTON STREET PATERSON, NEW JERSEY 07505
Superior Court Clerk's Office, Foreclosure Processing Services Attention: Objection to Notice of Intention to Foreclosure P.O. Box 971 Trenton, NJ 08625		

Dear above mentioned parties named above and below in this letter:

This letter is to OBJECT the notification I received from Wells Fargo/America's Servicing Company and Attorney Mark S. Melodia, Esquire, Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, New Jersey 08540.

The information is conflicting with other correspondence that I keep receiving in the mail and I am unsure how to respond to the dates contained within. In one space it is saying this is an action for foreclosure and in another space it is saying that I am not being sued directly with conflicting dates.

I have contacted LEGAL SERVICES that serves Union County residents and I am sending a copy of this letter to them as well seeking advice on what my rights are as a consumer and what courses of action I can take to remedy what is happening and has happened to me since receiving this mortgage from Wells Fargo and how best to proceed.

So as stated above, I Tracy Cooper would like to OBJECT as the letter to me indicated I can do and am seeking advice on how to proceed as I have been unemployed for quite some time and am now working full time and willing to set new arrangements for payment.

Sincerely,



Tracy Cooper

To: Randy Bockenstedt, Senior Vice President
America's Servicing Co.
Wells Fargo Home Mortgage
3480 Statewide Blvd
MAC X7802-03H
Fort Mill, SC 29715

REED SMITH LLP
Formed in the State of Delaware
 Mark S. Melodia, Esquire
 Diane A. Bettino, Esquire
 Princeton Forrestal Village
 136 Main Street, Suite 250
 Princeton, New Jersey 08540
 Tel. (609) 987-0050



Attorneys for Wells Fargo Bank, N.A.

)	SUPERIOR COURT OF NEW JERSEY
)	CHANCERY DIVISION
)	PASSAIC COUNTY
)	DOCKET NO.: F-009564-12
)	<u>CIVIL ACTION</u>
)	AMENDED ORDER TO SHOW CAUSE
)	
)	

THIS MATTER being brought before the Court by Reed Smith LLP, attorneys for Wells Fargo Bank, N.A. ("Wells Fargo"), authorized to act on behalf of Foreclosure Plaintiffs in pending foreclosure cases in New Jersey, seeking relief by way of summary action for an Order permitting Wells Fargo to issue corrected Notices of Intent to Foreclose ("NOI") to the defendant mortgagor and/or parties obligated on the debt ("Foreclosure Defendants") in the pending, pre-judgment, uncontested foreclosure cases listed on the Exhibits 1 through 34 to the Amended Verified Complaint ("Corrected NOI List") to include the name and address of the lender, and based upon the New Jersey Supreme Court's decision in US Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), the implementing Order of the New Jersey Supreme Court dated April 4, 2012;

AND THIS COURT previously entered an Order to Show Cause on July 19, 2012 requiring Wells Fargo to serve documents on the Foreclosure Defendants and through an

REED SMITH LLP
Formed in the State of Delaware
 Mark S. Melodia, Esquire
 Diane A. Bettino, Esquire
 Princeton Forrestal Village
 136 Main Street, Suite 250
 Princeton, New Jersey 08540
 Tel. (609) 987-0050

Attorneys for Wells Fargo Bank, N.A.

<p style="text-align: center;">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</p>	<p>) SUPERIOR COURT OF NEW JERSEY) CHANCERY DIVISION) PASSAIC COUNTY) DOCKET NO.: F-009564-12) <u>CIVIL ACTION</u>) AMENDED VERIFIED COMPLAINT) IN SUPPORT OF SUMMARY ACTION</p>
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Wells Fargo Bank, N.A., ("Wells Fargo"), authorized to act on behalf of the Foreclosure Plaintiffs in pending, pre-judgment uncontested foreclosure actions, brings this action pursuant to the April 4, 2012, Order of the New Jersey Supreme Court (the "April 4th Order"), that was entered following the Court's decision in U.S. Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), ("Guillaume"). Wells Fargo respectfully states as follows:

1. Wells Fargo is a national banking association and a wholly-owned subsidiary of Wells Fargo & Company, a bank holding company.
2. Wells Fargo services mortgage loans for residential properties in New Jersey either through its division, Wells Fargo Home Mortgage or its trade name, America's Servicing



3480 Stateview Blvd
MAC# D3348-027
Fort Mill, SC 29715

September 20, 2012

Re: *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*
Docket Number F- 009564-12

Dear Sir/Madam:

In the lawsuit referenced above, Wells Fargo is asking Judge McVeigh of the Superior Court of New Jersey to allow Wells Fargo to correct the Notice of Intention to Foreclose that was served on you before your individual foreclosure case was filed.

In August, you received a package from America's Servicing Company (a Division of Wells Fargo) telling you about this lawsuit. That package included an Explanatory Letter, the Order to Show Cause signed by Judge McVeigh and a Corrected Notice of Intention to Foreclose ("NOI").

We are writing to add some information to the package that was sent to you in August, 2012.

The Corrected NOI dated August 14, 2012 that you received a few weeks ago should have given you thirty (30) days to pay the arrears on your mortgage according to the Fair Foreclosure Act. When we mailed that letter, we did not give you enough time. Wells Fargo has extended the time for you to reinstate until October 1, 2012. **You will have until October 1, 2012 to reinstate your mortgage at the amount set forth in the Corrected NOI that you received in August, 2012.**

We are giving you three documents in this Supplemental Package. First, we are including a copy of the Verified Complaint that Wells Fargo filed in this case (without the Exhibits). The Verified Complaint with the Exhibits is available on the Court's website at <http://www.judiciary.state.nj.us/>. As you can see from a review of the Verified Complaint, Wells Fargo is not suing you directly in a new lawsuit but rather, is seeking permission from the Court to correct the prior NOI that was served on you before your individual foreclosure case was filed to include the name and address of the lender on your loan. Thus, although you are not being directly sued in this Order to Show Cause case, the Court's ruling will affect your pending foreclosure and the Court has given you the right to object as outlined in the Order to Show Cause and the Amended Order to Show Cause.

The second document is a copy of the Court's Amended Order to Show Cause that was just signed by Judge McVeigh. **The Court has moved the date you must file an objection from September 24, 2012 to October 18, 2012. The Court also moved the final hearing date from October 3, 2012 to November 1, 2012.** The Amended Order also gives you instructions about how to object to Wells Fargo's application. That information is also included in this letter, below.

If you cannot afford an attorney, you may apply for free legal assistance on line at www.lsnjlaw.org or call the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529) or call the Legal Services office in the county where you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is attached.

If you are represented by an attorney in your foreclosure case, you should notify him or her that you received these papers. These papers are not being sent directly to your attorney if you have one.

Questions about the Corrected Notice of Intention to Foreclose

Should you have questions with regard to your loan or the corrected Notice of Intention to Foreclose, please contact:

Randy Bockenstedt, Senior Vice President
America's Servicing Co.
Wells Fargo Home Mortgage
Address: 3480 Stateview Boulevard
MAC X7802-03H
Fort Mill, SC 29715
Phone Number: 1-800-868-0043

How to File an Objection

The prior package that you received included information about how you can object to Wells Fargo's application to issue corrected NOIs. Your time to object to Wells Fargo's application has been extended to October 18, 2012. You must file a written objection under the docket number for the Order to Show Cause, which is F-009564-12

You also have the right to object to the previously served corrected NOI. As the prior letter explained to you, you must file a written objection under the docket number for the foreclosure action in your individual case. If you do not have that docket number, you can locate it on the Court's website on the Exhibits to the Verified Complaint or by calling Wells Fargo at the above-listed number.

For either type of objection, you must set forth with specificity the basis of the objection, and file the objection with the Superior Court Clerk's Office at the following address no later than October 18, 2012:

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

Trenton, New Jersey 08625

You must also serve a copy of the objection on Wells Fargo/America's Servicing Company's attorney, Mark S. Melodia, Esquire, Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, New Jersey 08540 and mail a copy of the objection to Judge McVeigh, J.S.C., Superior Court of New Jersey, Chambers 100, 71 Hamilton Street, Paterson, New Jersey 07505.

Questions about Filing an Objection

Should you have questions related to the procedure for filing an objection, please visit the New Jersey Courts On-Line Self-Help Center at <http://www.judiciary.state.nj.us/prose/index.htm>. You may also contact the Superior Court Clerk's Office at (609) 421-6100, or at SCCOForeclosure.Mailbox@judiciary.state.nj.us.

This communication is an attempt to collect a debt and any information obtained will be used for that purpose. However, if you have received a discharge of this debt in bankruptcy or are currently in a bankruptcy case, this notice is not intended as an attempt to collect a debt and, this company has a security interest in the property and will only exercise its rights as against the property.