

RECEIVED

OCT 23 2012

George Tchkadua

(Your Name(s))

10 Sherwood Rd

(Your Mailing Address)

201-519-0657

(Your Daytime Telephone Number)

SUPERIOR COURT  
CLERK'S OFFICE

Superior Court of New Jersey  
Chancery Division  
General Equity

Wells Fargo Bank, N.A.

(Name of company or bank that filed the foreclosure complaint)

Plaintiff(s),

PASSAIC

Bergen County

County where the property is located or "Mercer" for an objection to the Order to Show Cause

Docket No F- 009564-12

Vz

CIVIL ACTION

OBJECTION TO: (select one)

Order to Show Cause

Corrected Notice of Intention to Foreclose

George Tchkadua

(Name of first defendant listed on the complaint)

Defendant(s),

I/We George Tchkadua

(filing party or parties)

F-009564-12

, the defendant(s) in the foreclosure matter

hereby object

(caption and docket number if different from above)

to the Plaintiff's filing of the (select one)

Order to Show Cause

Corrected Notice of Intention to Foreclose for the following specific reasons:

1. I object to the corrected notice of intent to foreclose. I never received a valid 30 day notice of intent to foreclose (NOI) from the plaintiff Wells Fargo as prescribed in the New Jersey Fair Foreclosure Act.

2. The amount of money that was stated (in the Notice to Intent to Foreclose) and was needed to tender to cure default is incorrect because it includes fees other than the amount that would have been due in the absence of default.

4. I have not received an financial statement from the plaintiff in the corrected notice of intent.

5. The corrected notice of intent indicated that my loan may have changed from the Plaintiff in the foreclosure action and that my new lenders name is on the corrected notice of intent (NOI). One of the strict requirements of the New Jersey Fair Foreclosure Act is that the holder of the mortgage and note is made clear and evident. The plaintiff did not have physical possession of the note at the time the complaint was filed.

6. The financial statement is incorrect. The unpaid late fee does not compute to 1873.12 at 92.81 a month.

7. The miscellaneous fee should be accompanied with a general explanation as to what kind of fee. (ex. postage)

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.

10/18/2012

Date

G. TCHKADUA

Signature

George Tchkadua

Print or Type Name

### Certification of Service

I hereby certify that on 10/18/2012 I sent my objection to the following parties by: (Select which mailing method you chose. If you sent it by both regular and certified mail, check both.

regular mail                       certified mail                       other \_\_\_\_\_

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 Esquire, Reed Smith LLP

Name \_\_\_\_\_

Address Princeton Forrestal Villiage

Address \_\_\_\_\_

136 Main St.

\_\_\_\_\_

Princeton, NJ 08540

\_\_\_\_\_

Attorney for American Servicing Company

Attorney for \_\_\_\_\_

10/18/2012  
Date

G. Tchkadua  
Signature  
George Tchkadua  
Print or Type Name