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Appendix XII-B2



SUPERIOR COURT
CLERK'S OFFICE

FORECLOSURE
CASE INFORMATION STATEMENT
(FCIS)

Use for initial Chancery Division — General Equity
foreclosure pleadings (not motions) under Rule 4:5-1.
Pleading will be rejected for filing, under Rule 1:5-6(c),
if information is not furnished or if attorney's signature
is not affixed.

FOR USE BY CLERK'S OFFICE ONLY

PAYMENT TYPE CK CG CA MO

RECEIPT NO

AMOUNT

OVERPAYMENT

BATCH NUMBER

BATCH DATE

SECTION A: TO BE COMPLETED BY ALL PARTIES

CAPTION

Wells Fargo N A.
v
Rodney K Jackson et als

COUNTY OF VENUE

Union

DOCKET NUMBER (when available)

F-009564-12

NAME(S) OF FILING PARTY(IES) (e.g. John Doe, Plaintiff)

Rodney K Jackson

DOCUMENT TYPE

COMPLAINT ANSWER OTHER

ATTORNEY NAME (IF APPLICABLE)

FIRM NAME (IF APPLICABLE)

MAILING ADDRESS

1450 E 2nd st, Plainfield, NJ 07062

DAYTIME TELEPHONE NUMBER

(908) 305-6044

SECTION B: TO BE COMPLETED BY PLAINTIFF TO INITIAL COMPLAINT

FORECLOSURE CASE TYPE NUMBER

- 088 IN PERSONAM TAX FORECLOSURE
- 089 IN REM TAX FORECLOSURE
- 0RF RESIDENTIAL MORTGAGE FORECLOSURE
- 0CF COMMERCIAL MORTGAGE FORECLOSURE
- 0CD CONDOMINIUM OR HOMEOWNER'S ASSOCIATION LIEN FORECLOSURE
- 091 STRICT FORECLOSURE
- 0FP OPTIONAL FORECLOSURE PROCEDURE (NO SALE)
- 0TS TIME SHARE FORECLOSURE

IS THIS A HIGH RISK MORTGAGE PURSUANT TO P L 2009,C 84 AND P L 2008,C 127 YES NO

PURCHASE MONEY MORTGAGE YES NO

RELATED PENDING CASE YES NO

IF YES, LIST DOCKET NUMBERS

F64688-09

FULL PHYSICAL STREET ADDRESS OF PROPERTY

1207-09 W 3rd St
Plainfield, N&

MUNICIPALITY CODE (*) 2012

MUNICIPAL BLOCK 00133

ZIP CODE 07062

COUNTY Union

(LOTS) 2

ALL FILING PARTIES MUST SIGN AND PRINT NAMES(S) AND DATE THE FORM BELOW

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

ATTORNEY / SELF REPRESENTED SIGNATURE

PRINT ATTORNEY / SELF REPRESENTED NAME

DATE

Rodney K Jackson

1/7/13

*The Municipality Codes can be found at http://www.judiciary.state.nj.us/forms/11343_municodes.pdf

FORM A

Rodney K Jackson
(Your Name(s)) 1450 E 2nd St, Planfield, NJ 07062

(Your Mailing Address)
908-305-6044

(Your Daytime Telephone Number)

Defendant(s) Pro Se

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION – GENERAL EQUITY
Union COUNTY

(County where the property is located)

Docket No F- 009564-12

Wells Fargo Bank N A
(Name of company or bank that filed the foreclosure complaint)

Plaintiff(s),

vs.

Rodney K Jackson
(Name of first defendant listed on the complaint)

Defendant(s),

CIVIL ACTION
ANSWER

Rodney K Jackson residing at

(Insert your name(s))

1450 E 2nd St

(Insert your street address)

in the City of Plainfield, NJ 0706 , County of Union and State of NJ ,
by way of Answer to the plaintiff's complaint herein, says:

AS TO THE FIRST COUNT:

Defendant admits/denies or is without knowledge or information sufficient to form a belief as to the truth of the allegation of each of the following paragraphs of the first count of the complaint as follows:

This foreclosure was already filed by Citibank represented by Phelan Hallinan in 2009 docket # F-64688-09 I also received a summons from Wells Fargo represented Reed Smith LLP docket # F009564-12 on September 17, 2012 I have not received all the documents requested in my QWR. Specifically, I have not seen a copy of the note from either party. I searched the Union County Clerks Public Land Records database and I don't see the mortgage being recorded by either party I do not know who has the note on this property I think I was the victim of predatory lending by Eastern American Mortgage with whom I applied for the mortgage I requested the document in my QWR so I can properly review it. Also I have been getting the runaround by Wells Fargo through out the modification process I have submitted documents numerous times. They don't get reviewed until 30 days or more later then I'm told they are outdated and I have to submit them again. I have submitted documents and been told they were not received I submitted them with a return receipt and was still told they could not locate them. I get a new point of contact every month and never know who to submit the documents to

FORM A

AS TO THE SECOND COUNT:

Defendant admits/denies or is without knowledge or information sufficient to form a belief as to the truth of the allegation of each of the paragraphs of the second count of the complaint as follows:

[Note Defendants must include all separate (see *R* 4:5-3) and affirmative defenses (see *R* 4:5-4), raise them by motion as permitted in *R* 4.6-2, or otherwise raise the defense in a timely manner or those separate defenses and affirmative defenses are waived]

FIRST SEPARATE DEFENSE

SECOND SEPARATE DEFENSE

FORM A

THIRD SEPARATE DEFENSE

[Empty rectangular box for Third Separate Defense]

FIRST AFFIRMATIVE DEFENSE

[Empty rectangular box for First Affirmative Defense]

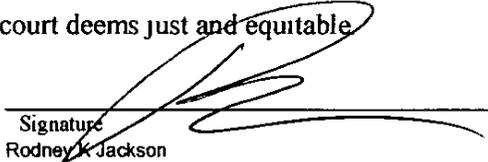
SECOND AFFIRMATIVE DEFENSE

[Empty rectangular box for Second Affirmative Defense]

Wherefore, Defendant demands judgment

- A. Dismissing the plaintiff's complaint,
- B. Awarding defendant costs incurred in defending against this action, and
- C. For such other relief as the court deems just and equitable.

Dated 1/9/13



 Signature
 Rodney K. Jackson

 Print or Type Name

Dated _____

 Signature

 Print or Type Name

FORM A

CERTIFICATION PURSUANT TO RULE 4:5-1

The matter in controversy is not the subject of any other action pending in any other New Jersey court. There are no pending arbitration proceedings. No other action or arbitration proceedings are contemplated. No non-party is known who would be subject to inclusion or joinder in this case because of potential liability.

Dated 1/9/13

Signature
Rodney K Jackson
Print or Type Name

Dated

Signature
Print or Type Name

CERTIFICATION OF MAILING ANSWER TO COURT AND TO THE ATTORNEY FOR THE PLAINTIFF

I hereby certify that

1 A copy of the within Answer was filed within the time prescribed by the Rules of Court.

2 On 1/9/13 I, the undersigned, mailed to Reed Smityy LLP
(insert the date) (insert the name of the plaintiff's attorney)

Attorneys for Plaintiff, at Princeton Forrestal Village 136 Main St Ste 250
(insert the address of the plaintiff's attorney) Princeton NJ 08540
by regular mail, a true copy of the within Answer

I hereby certify that the statements made by me in this document are true. I am aware that if any are willfully false, I am subject to punishment

Dated 1/9/13

Signature
Rodney K Jackson
Print or Type Name

Dated

Signature
Print or Type Name

COURT DATES

No pre-trial conference, arbitration proceeding, calendar call or trial date has been set except as follows: (If any dates have been scheduled, note them here; otherwise state "none")

DISCOVERY END DATE

Check one

Discovery in this matter is scheduled to be completed on 2/27/13

A discovery end date has not been assigned to this matter.

CERTIFICATION REGARDING ATTEMPTS TO RESOLVE

(Required for discovery and calendar motions – check one)

I certify that I have personally discussed this matter with the attorney for the opposing party, or the opposing party if appearing *pro se*, in order to resolve the issues raised by this motion. This effort was not successful

I certify that I have made a good faith effort to personally discuss this matter with the attorney for the opposing party, or with the party if appearing *pro se*, in order to resolve the issues raised by this motion. The effort I made included the following action (specify attempts to confer)

I certify that I have advised the attorney for the opposing party, or the party if appearing *pro se*, by letter that if I will make this motion if she/he continues to fail to comply with my discovery request.

I 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 1/9/13

Signature
Rodney Jackson
(print or type your name)

If this is the first paper you are filing in this case, you must sign the following certification. I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-1(h)

Date: _____

Signature
Rodney Jackson
(print or type your name)

SUPERIOR COURT OF NEW JERSEY
Chancery **DIVISION** *General Equity*

Rodney Jackson
Your Name

Union _____ County _____

1450 E 2nd St
Street Address

Docket Number F-009564-12

Plainfield, NJ 0706
Town, State, Zip Code

(908) 305-6044
Telephone Number

CIVIL ACTION
Certification in Support of Motion

Wells Fargo Bank N.A.
Plaintiff

vs.

Rodney Jackson
Defendant

I, Rodney Jackson, am the plaintiff defendant
in the above-captioned matter. I make this certification in support of my motion to (state what you
want the court to do)

Vacate : Default and file an answer out of Time

This motion should be granted because:

(State the basis for your motion and why it should be granted. Use extra paper if necessary)

This foreclosure was filed by City bank represented by Phelan Hallinan docket # F64688-09 in 2009. I was also issued a summons by Reed Smith LLP docketed # F009564-12 on September 17, 2012. I wish to file an answer but I have not received all of the documents from either party requested in my QWR. Also I feel I may have been the victim of Predatory Lending by Eastern American Mortgage with whom I applied for the mortgage. I have also been getting eh runaround from Wells Fargo throughout the modification proces

I certify that the above statements made by me are true and that if any of the statements are willfully false, I am subject to punishment.

CERTIFICATION OF SERVICE

I certify that on 1/9/13 I sent a copy of the Notice of Motion, Certification, and proposed form of Order to the following parties by to the following by: (Check which mailing method you chose. If you sent it by both regular and certified mail, check both)

regular mail certified mail

List each party to the lawsuit; use the attorney's name and address if the party is represented by counsel.

Name Reed Smith LLP

Name _____

Address 136 Main St Suite 250
Princeton, NJ 08540

Address _____

Attorney for Wells Fargo N.A.

Attorney for _____

Date: 1/6/13



Signature:
Rodney K. Jackson
(print or type your name)

SUPERIOR COURT OF NEW JERSEY
Chancery **DIVISION** *General Equity*

Rodney Jackson

Your Name

1450 E 2nd St

Street Address

Plainfield, NJ 0706

Town, State, Zip Code

(908) 305-6044

Telephone Number

Wells Fargo Bank N.A.

Plaintiff

vs.

Rodney Jackson

Defendant

Union _____ County _____
Docket Number F-009564-12

CIVIL ACTION
Order

This matter having been brought before the Court on Motion of (check one)
 plaintiff defendant for an Order (describe relief requested)

and the Court having considered the matter and for good cause appearing,

It is on this _____ day of _____, 20
ORDERED as follows:

_____, J.S.C.

opposed

unopposed