

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
PASSIC COUNTY

DOCKET NO.: F009564-12

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

CIVIL ACTION

ORDER TO SHOW CAUSE

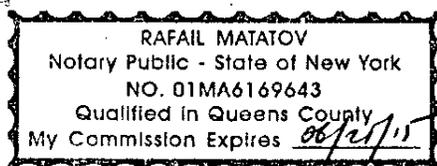
I, Michelle German a defendant in a foreclosure action in Superior Court of New Jersey in Chancery court Docket # F27172-08 and Appeals court Docket # A000560-10; am filing this **OBJECTION** to being included in anyway for CORRECTED NOTICES OF INTENT TO FORECLOSE under Docket # F009564-12, for the following reasons.

- I do not qualify to be a part of your pending action since I **never received** a 30 day Notice of Intent to Foreclosure (NOI) from the plaintiff in my case.
- My case is a **contested** action and your pending action involves parties (defendants and plaintiffs) who are currently involved in a uncontested action.

Cordially yours,

*Michelle German*

Michelle German



9/24/12 *Rafail Matatov*

Michelle German  
180 Lindbergh Blvd  
Teaneck, NJ 07666  
(917) 499-3359

Mark S. Melodia, Esquire  
Reed Smith LLP  
Princeton Forrestal Village  
136 Main Street  
Princeton, NJ 08540

9/22/12

re: **Objection to OSC for ASC**  
NOI under Docket # F-009564-12

Dear Mr. Melodia:

I am in receipt of your client America's Servicing Company's', Order to Show Cause filed in the Superior Court of New Jersey, the Chancery Division, Passaic County, under Docket # F-009564-12. I object to being included as a party to the pending action under docket # F-009564-12, for the following reasons:

- I do not qualify to be a part of your pending action since I **never received** a 30 day Notice of Intent to Foreclosure (NOI) from the plaintiff in my case.
- My case is a **contested** action and your pending action involves parties (defendants and plaintiffs) who are currently involved in a uncontested action.

In addition my alleged 'corrected' Notice of Intention to Foreclose is questionable as computed by your client, ASC. Since it differs considerably from the financial information I received from the plaintiff, (see attached plaintiff statement). For example the plaintiff information does not provide payments totaling \$261,757.93.

Since the figures on the alleged corrected NOI are unexplained and not verifiable, I object to your invalid correction of Notice of Intention being used or allowed as a lawful financial statement in any court of proper jurisdiction.

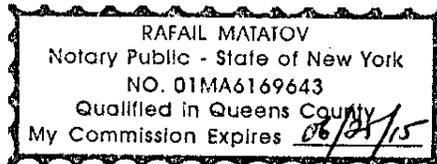
In conclusion, ASC stated in its unnumbered correspondence (on approximately page 6) that "the corrected Notice of Intention list the name and address of your current lender on your loan". Your name and address is listed on the top of the corrected NOI.

There is nothing new about you. You are the same server for Deutsche Bank that I attempted to negotiate a loan modification with. While in that process with ASC, I was foreclosed against by Deutsche Bank. Therefore, it is a deceptive act, for ASC, the servicing agent for the bank, to falsify their current relationship with the bank, by stating that the lender for my loan may have changed from the named plaintiff in the foreclosure action, and that my new lender's name is on the corrected NOI.

Very truly yours,

*Michelle German*

Michelle German



9/24/12

*Rafail Matatov*

**CERTIFICATION PURSUANT TO RULE 4:5-1**

The undersigned does hereby certify that the matter in controversy is not the subject of any other pending lawsuits, proceedings or arbitrations in existence or currently contemplated of which I am aware.

**SERVICE UPON ATTORNEY GENERAL**

Service of a copy of: Notice of OBJECTION TO: ORDER TO SHOW CAUSE: Docket No.: F-0009564-12, CIVIL ACTION, Filed July 19, 2012, (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), , along with a copy and Notice of OBJECTION TO: corrected NOTICES OF INTENT TO FORECLOSE (ON BEHALF OF IDENTIFIED FORECLOSURE PLAINTIFFS IN UNCONTESTED CASES) ORDER TO SHOW CAUSE: Docket No.: F-27172-08 , CIVIL ACTION, Filed July 16, 2008, (IN RE APPLICATION BY DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN MORTGAGE LOAN TRUST 2006-FF11) Filed July 19, 2012, in this matter is being made upon the Attorney General of the State of New Jersey, pursuant to the Consumer Fraud Act for the purpose on encouraging intervention, by mailing a copy of said Complaint to Anne Milgram, Attorney General, Office of the Attorney General, Hughes Justice Complex, P.O. Box 080, 25 West Market Street, Trenton, New Jersey 08624-0080. Without prejudice, reservation of all rights UCC 1-308, UCC 1-207, UCC 1-103.6, UCC 3-608, Title 42 USC, section 14141.

Dated: September 24 2012

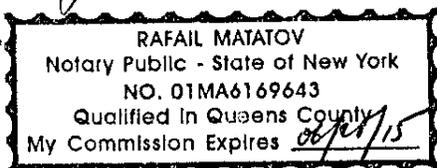
By: Michelle German

Michelle German

(Defendant's name printed)

Sworn to before me 9/24/12

Notary public [Signature]



FORM B

**CERTIFICATE OF SERVICE**

I, Gloria Bolden being duly sworn, disposes and says that deponent is upward of the age of eighteen years and resides at 403 Quincy St., Brooklyn, NY 11221

CERTIFY THAT ON September 24 2012, I SERVED A COPY OF THE, Notice of OBJECTION TO: ORDER TO SHOW CAUSE: Docket No.: F-0009564-12, CIVIL ACTION, Filed July 19, 2012, (IN RE APPLICATION BY WELLS FARGO BANK, N.A. TO ISSUE CORRECTED NOTICES OF INTENT TO FORECLOSE ON BEHALF OF IDENTIFLED FORECOSURE PLAINTIFFS IN UNCONTESTED CASES), and Notice of OBJECTION TO: corrected NOTICES OF INTENT TO FORECLOSE (ON BEHALF OF IDENTIFIED FORECOSURE PLAINTIFFS IN UNCONTESTED CASES) ORDER TO SHOW CAUSE: Docket No.: F-27172-08 , CIVIL ACTION, Filed July 16, 2008, (IN RE APPLICATION BY DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN MORTGAGE LOAN TRUST 2006-FF11) Filed July 19, 2012, and to be heard on October 03, 2012, to the

following party:

Judge Mc Veigh, J.S.C., Superior Court  
Of New Jersey , Chambers 100, 71 Hamilton Street,  
Paterson, New Jersey 07505.08540

Randy Brockenstedt, Senior Vice President  
America's Servicing Co.  
3480 Stateview Boulevard  
MAC X 7802-03H  
Fort Mill, SC 29715  
Ph# 1-800-868-0043

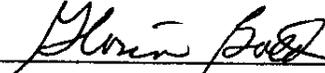
SUPERIOR COURT CLERK'S OFFICE, FORECLOSURE  
PROCESSING SERVICES  
ATTENTION: Objection to Notice of Intention to Foreclose  
P.O. Box 971, TRENTON, NEW JERSEY 08625

Mark S. Melodia, Esquire, Reed Smith LLP, Princeton Forrestal Village,  
136 Main Street, Princeton,  
NEW JERSEY 08540

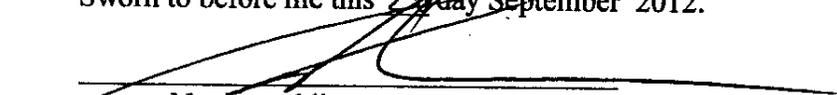
UNIT, HUGHES JUSTICE COMPLEX  
25 MARKET STREET, CN 971  
TRENTON, NEW JERSEY 08625

PHELAN HALLINAN & SCHMIEG, PC  
Attorneys for the Plaintiff  
400 Fellowship Road, Suite 100  
Mt. Laurel, NJ 08054

by:         regular mail    certified mail         personal service

  
\_\_\_\_\_  
server

Sworn to before me this 24 day King's County September 2012.

  
\_\_\_\_\_  
Notary public

**ROBERT FILIPPI**  
Notary Public, State of New York  
No. 01F14626000  
Qualified in Queens County  
Commission Expires 12/31/14

**CERTIFICATE OF SERVICE**

I, CERTIFY THAT ON September 24 2012, I SENT A COPY OF MOTION TO: Notice of OBJECTION TO: ORDER TO SHOW CAUSE: Docket No.: F-0009564-12, CIVIL ACTION, Filed July 19, 2012, (IN RE APPLICATION BY WELLS FARGO BANK, N.A. TO ISSUE CORRECTED NOTICES OF INTENT TO FORECLOSE ON BEHALF OF IDENTIFLED FORECOSURE PLAINTIFFS IN UNCONTESTED CASES), , along with a copy and Notice of OBJECTION TO: corrected NOTICES OF INTENT TO FORECLOSE (ON BEHALF OF IDENTIFIED FORECOSURE F PLAINTIFFS IN UNCONTESTED CASES) ORDER TO SHOW CAUSE: Docket No.: -27172-08 , CIVIL ACTION, Filed July 16, 2008, (IN RE APPLICATION BY DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN MORTGAGE LOAN TRUST 2006-FF11) Filed July 19, 2012, to the following by (check which mailing method you chose.

If you sent it by regular and certified mail, check both))

regular mail       certified mail

List each party to the law suit: use the attorney's name and address if the party is represented by counsel.

OFFICE OF FORECLOSURE,  
SUPERIOR COURT OF NEW JERSEY, OFFICE OF THE CLERK  
ATTN: FORECLOSURE UNIT, HUGHES JUSTICE COMPLEX  
25 MARKET STREET, CN 971  
TRENTON, NEW JERSEY 08625

PHELAN HALLINAN & SCHMIEG, PC  
Attorneys for the Plaintiff  
400 Fellowship Road, Suite 100  
Mt. Laurel, NJ 08054

Date: 24 day, September \_\_\_\_ 2012.

  
server

**CERTIFICATE OF SERVICE**

I, Gloria Bolden being duly sworn, disposes and says that deponent is upward of the age of eighteen years and resides at 403 Quincy St., Brooklyn, NY 11221

CERTIFY THAT ON September 24 2012, I SERVED A COPY OF THE, Notice of OBJECTION TO: ORDER TO SHOW CAUSE: Docket No.: F-0009564-12, CIVIL ACTION, Filed July 19, 2012, (IN RE APPLICATION BY WELLS FARGO BANK, N.A. TO ISSUE CORRECTED NOTICES OF INTENT TO FORECLOSE ON BEHALF OF IDENTIFLED FORECOSURE PLAINTIFFS IN UNCONTESTED CASES), , along with a copy and Notice of OBJECTION TO: corrected NOTICES OF INTENT TO FORECLOSE (ON BEHALF OF IDENTIFIED FORECOSURE PLAINTIFFS IN UNCONTESTED CASES) ORDER TO SHOW CAUSE: Docket No.: F-27172-08 , CIVIL ACTION, Filed July 16, 2008, (IN RE APPLICATION BY DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN MORTGAGE LOAN TRUST 2006-FF11) Filed July 19, 2012, to the following party:

Clerk/agent of SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION,  
10 Main Street, Hackensack, New Jersey, in room 340.

by:         regular mail    certified mail     personal service

ATTN:

Judge Mc Veigh, J.S.C., Superior Court  
Of New Jersey, Chambers 100, 71 Hamilton Street,  
Paterson, New Jersey 07505.08540

Dated: September \_\_\_ 2012

By: Gloria Bolden  
server

Sworn to before me September 24, 2012  
Kings County

[Signature]

**ROBERT FILIPPI**  
Notary Public, State of New York  
No. 01F14626960  
Qualified in Queens County  
Commission Expires 12/31/14



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

NJSA0814122265

MICHELLE GERMAN  
180 LINDBERGH BLVD  
TEANECK, NJ 07666

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.



8/14/2012

MICHELLE GERMAN  
180 LINDBERGH BLVD  
TEANECK, NJ 07666

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 MICHELLE GERMAN:

Please be advised that the New Jersey Supreme Court recently held in *U.S. Bank N.A. v. Guillaume*, 209 N.J. 449 (2012), that mortgage lenders seeking to foreclose must comply with the New Jersey Fair Foreclosure Act's requirement that a Notice of Intention to Foreclose set forth the name and address of the lender.

**Why You Are Receiving This Letter**

You are receiving this letter because you are the defendant in a pending foreclosure action, and it is believed that the Notice of Intention to Foreclose served upon you prior to the commencement of the foreclosure action did not comply with the requirements of the Fair Foreclosure Act.

By the court's Order to Show Cause dated July 19, 2012, and in compliance with the Supreme Court's opinion in *U.S. Bank N.A. v. Guillaume*, the Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, gave permission to America's Servicing Co. to serve, along with the Order to Show Cause and verified complaint, corrected Notices of Intention to Foreclose on all defendant mortgagors/parties obligated on the debt in pending foreclosure actions filed before February 28, 2012.

**Information About the Order to Show Cause and Verified Complaint**

Enclosed with this letter are copies of the Order to Show Cause and verified complaint. The verified complaint lists the following lenders in the following counts of the verified complaint:

- Count 1 - Bank of America, N.A.
- Count 2 - Bank of New York Mellon
- Count 3 - BankAtlantic
- Count 4 - Bayview Financial
- Count 5 - CitiBank, N.A.
- Count 6 - Commerce Bancorp.
- Count 7 - Copperfield Investments
- Count 8 - Deutsche Bank
- Count 9 - DLJ Mortgage Capital, Inc.
- Count 10 - E\*Trade
- Count 11 - EMC Mortgage

- Count 14 - Federal National Mortgage Association
- Count 15 - Federal Home Loan Bank of Chicago
- Count 16 - FTN Financial
- Count 17 - GE Capital Mortgage Services, Inc.
- Count 18 - GMAC Bank
- Count 19 - HSBC Bank, N.A.
- Count 20 - Hudson City Savings Bank
- Count 21 - Investors Savings Bank
- Count 22 - JP Morgan Chase Bank
- Count 23 - LaSalle Bank, N.A.
- Count 24 - Lehman Brothers
- Count 25 - LEX Special Assets
- Count 26 - MidFirst Bank
- Count 27 - New York Life Assurance and Annuity Corporation
- Count 28 - PNC Bank
- Count 29 - Residential Accredited Loans, Inc.
- Count 30 - Riggs Real Estate Investment Corporation
- Count 31 - UBS Bank
- Count 32 - United States Department of Housing and Urban Development
- Count 33 - U.S. Bank, N.A.
- Count 34 - Wilmington Trust Company

The attachments to the verified complaint, which list the foreclosure actions in which the above-named lenders are the plaintiffs, will be made available on the New Jersey Courts web site at <http://www.judiciary.state.nj.us/>. If you are unsure of the docket number for your foreclosure action, you can access that information on the court's website on the attached exhibits to the verified complaint by entering your name into the automatic search field on the website. If you do not have access to a computer or have trouble locating that information on the Court's website, you can contact the following America's Servicing representative who can assist you with locating the information about your foreclosure action:

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

**Information About the Corrected Notice of Intention to Foreclose**

Also enclosed with this letter is the corrected Notice of Intention to Foreclose. It allows you an additional 30 days in which to cure the default without having to pay the plaintiff's court costs and attorneys' fees. It also sets forth important information about your loan, including information on how you can cure the default; the consequences of failing to cure the default; contact information for the plaintiff; and information about retaining counsel and borrower assistance. If you fail to cure the default by the date set forth in the corrected Notice of Intention to Foreclose, the foreclosure action against you will proceed.

With the passage of time since the foreclosure action was filed against you, the lender on your loan may have changed from the named plaintiff in the foreclosure action.

The corrected Notice of Intention to Foreclose lists the name and address of the current lender on your loan.

**Questions about the 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.  
Address: 3480 Stateview Boulevard  
MAC X7802-03H  
Fort Mill, SC 29715  
Phone Number: 1-800-868-0043

Additional contact information is provided in the corrected Notice of Intention to Foreclose.

**How to File an Objection**

~~You have~~ the right to object to the enclosed Order to Show Cause (the process by which the court gave the plaintiff permission to serve the corrected Notice of Intention to Foreclose). To do so, you must file a written objection under the docket number for the Order to Show Cause.

You also have the right to object to the enclosed corrected Notice of Intention to Foreclose. To do so, you must file a written objection under the docket number for the foreclosure action in your individual case.

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 within 30 days:

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 America's Servicing Co.'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.



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

Date: 8/14/2012

MICHELLE GERMAN  
180 LINDBERGH BLVD  
TEANECK, NJ 07666

RE: America's Servicing Co. 106/1300008022  
Mortgagor(s): MICHELLE GERMAN  
Mortgaged Premises: 180 LINDBERGH BLVD  
TEANECK  
NJ  
07666-6523

**NOTICE OF INTENTION TO FORECLOSE**

Dear Borrower(s):

America's Servicing Co. services a mortgage (hereafter, the "Mortgage") in the original principal amount of \$ 495,000.00 on the residential property commonly known as 180 LINDBERGH BLVD, TEANECK, NJ 07666-6523, which Mortgage was made on 5/25/2006.

Your Mortgage is now in default because you have not made the required payments. The total amount required to cure this default, in other words, the amount required to bring your mortgage current as of 9/17/2012 is as follows:

Monthly payments (principal, interest, and escrow) from 4/1/2008 are as follows:

Payments- Totaling	\$ 261,757.93
Total Accrued Unpaid Late Charges (Monthly Late Charge \$ 198.97)	\$ 10,744.38
Unapplied Funds	\$ 0.00
Miscellaneous Fees	\$ 1,737.50
Total Delinquency as of 8/14/2012	\$ 274,239.81

**Your Pre-Foreclosure Action Right to cure this Default**

To avoid the possibility of acceleration, you must pay this amount plus any additional monthly payments, late charges and other charges that may be due under applicable law after the date of this notice and on or before 9/17/2012 in CERTIFIED funds, to:

**Payments only address:**

America's Servicing Co.  
1200 W 7th Street  
Suite L2-200  
Los Angeles, CA 90017

**Correspondence only address:**

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

Please be advised that America's Servicing Co. cannot guarantee that payments received at the "correspondence only address" will be applied within the required timeframes.

If you do not cure this default and bring your account current by 9/17/2012, then America's Servicing Co. may take steps to terminate your ownership of the Property by starting a mortgage foreclosure action against you.

If you cure this default before the filing of the foreclosure action, America's Servicing Co. may not institute a foreclosure action against you for that default; your Mortgage will be reinstated to the same position as if the default had not occurred, and any acceleration of any obligation under the Mortgage or Note will be nullified as of the date of cure.

You have the right to transfer the property to another person subject to the Mortgage; that person will have the right to cure this default, subject to the Mortgage and the Note, and this Notice.

**Your Post-Foreclosure Action Right to cure this Default**

Even if America's Servicing Co. starts a mortgage foreclosure action against you, you shall still have the right to cure this default, de-accelerate and reinstate your Mortgage up to the time when a final judgment for foreclosure is entered. To do so, you must pay America's Servicing Co., at the address specified above, by cashier's check or certified check, all sums which would have been due in the absence of default and which are due at the time of payment including principal and interest payments, escrow payments and other necessary charges which come due prior to the date of payment and you must perform any other obligation which you would have been bound to perform in the absence of default or the exercise of an acceleration clause, if any. In addition you must pay court costs, if any, and attorney(s) fees in an amount which shall not exceed the amount permitted under the Rules governing the Courts of the State of New Jersey, plus all contractual late charges, as provided for in the Note and Mortgage. You shall not be required to pay any separate charge, fee or penalty attributable to the exercise of your right to cure this default. This right to cure your default, de-accelerate and reinstate the Mortgage after a foreclosure action has been started may only be exercised by you once every 18 months. You have the right to bring a court action to assert the non-existence of a default or any other defense you may have to acceleration and sale.

If you cure the default after a foreclosure action has been started, America's Servicing Co. shall give written notice of the cure to the Court and, upon such notice, the Court shall dismiss the foreclosure action, without prejudice. Your Mortgage will be reinstated to the same position as if the default had not occurred and any acceleration of any obligation under the Mortgage and Note arising from the default will be nullified as of the cure date.

We urge you to immediately seek the advice of an attorney(s) of your own choosing concerning this residential mortgage default. If you are unable to obtain an attorney(s), you may communicate with the New Jersey Bar Association or the Lawyers Referral Service of the county where the property is located. If you are unable to afford an attorney(s), you may communicate with the Legal Services Office in the county where the property is located. These telephone numbers are listed on the attached sheet; they can also be found in the local telephone directory.

There may be available to you financial assistance for curing a default from programs operated by the state or federal government or non-profit organizations, if any, as identified by the Commissioner of Banking and Insurance. A list of such governmental and non-profit entities is enclosed. You may also wish to call the following numbers to ascertain whether you qualify for such assistance:

If you disagree with America's Servicing Co.'s assertion that a default has occurred, or if you disagree with the correctness of America's Servicing Co.'s calculation of the amount required to cure this default, you may contact America's Servicing Co. at the following:

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

The lender of your loan is:

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN  
MORTGAGE LOAN TRUST 2006-FF11  
1761 East St. Andrew Place  
Santa Ana, CA 92705-4934

Your right to cure this default, as provided in this Notice, is independent of any right of redemption or any other right or remedy under the common law, principles of equity, state or federal statute or rule of court. Financial Assistance for curing your default may be available. Attached you will find a list of possible programs.

Very truly yours,

America's Servicing Co.  
Default Management Department

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.

## Fair Foreclosure Act Notice of Intention to Foreclose - List of Entities Providing Assistance

The following is a list of governmental and non-profit entities that may provide financial assistance or counseling to borrowers in foreclosure.

<b>American Credit Alliance, Inc.</b> 26 S. Warren St. Trenton, NJ 08608 609-393-5400	<b>Atlantic Human Resources, Inc.</b> 1 S. New York Ave. Atlantic City, NJ 08401 609-348-4131	<b>Consumer Credit Counseling Service of Central New Jersey</b> 1931 Nottingham Way Hamilton, NJ 08619 609-586-2574
<b>Consumer Credit Counseling Service of New Jersey</b> 185 Ridgedale Ave. Cedar Knolls, NJ 07927-1812 973-267-4324	<b>Fair Housing Council of Northern New Jersey</b> 131 Main St. Hackensack, NJ 07601 201-489-3552	<b>Garden State Consumer Credit Counseling, Inc.</b> 225 Willowbrook Road Freehold, NJ 07728 1-800-992-4557
<b>Jersey Counseling &amp; Housing Development, Inc.</b> 29 S. Blackhorse Pike Blackwood, NJ 08012 856-227-3683	<b>Jersey Counseling &amp; Housing Development, Inc.</b> 1840 S. Broadway Camden, NJ 08104 856-541-1000	<b>Mercer County Hispanic Association</b> 200 E. State St., 2nd Floor Trenton, NJ 08607 609-392-2446
<b>Middlesex County Economic Opportunities Corporation</b> 1215 Livingston Ave. North Brunswick, NJ 08902 732-790-3344	<b>Monmouth County Human Services Housing Services Unit</b> P.O. Box 3000 Freehold, NJ 07728 732-431-7998	<b>NJ Citizen Action (main office/financial education center)</b> 744 Broad St., Suite 2080 Newark, NJ 07102 973-643-8800 1-800-NJ-OWNER (loan counseling) 1-888-TAXES-11 (free tax preparation assistance)
<b>NJ Citizen Action (Central Jersey)</b> 85 Raritan Ave., Suite 100 Highland Park, NJ 08904 732-246-4772	<b>NJ Citizen Action (South Jersey)</b> 2 Riverside Drive, Suite 362 Camden, NJ 08103 856-966-3091	<b>Ocean Community Economic Action Now, Inc.</b> 22 Hyers St. Toms River, NJ 08753-0773 732-244-2351, ext. 2
<b>Paterson Coalition for Housing, Inc.</b> 262 Main St., 5th Floor Paterson, NJ 07505 973-684-5998	<b>Paterson Task Force for Community Action, Inc.</b> 155 Ellison St. Paterson, NJ 07505 973-279-2333	<b>Puerto Rican Action Board Housing Coalition Unit</b> 90 Jersey Ave. New Brunswick, NJ 08903 732-249-9700
<b>Tri-County Community Action Agency, Inc.</b> 110 Cohansey St. Bridgeton, NJ 08302 856-451-6330	<b>Urban League for Bergen County</b> 106 W. Palisade Ave. Englewood, NJ 07631 201-568-4988	<b>Urban League for Essex County</b> 508 Central Ave. Newark, NJ 07101 973-624-9535
<b>Urban League of Union County</b> 288 N. Broad St. Elizabeth, NJ 07208 908-351-7200	<b>Homelessness Prevention Program</b> New Jersey Department of Community Affairs (866) 889-6270*	

\*Basic eligibility is limited to: (a) single family owner/occupied dwellings with all those on the deed and mortgage occupying the house; (b) no more than one mortgage or lien encumbrance on the property; (c) no initiated or ongoing bankruptcy. Assistance will be in the form of a loan, and a lien will be placed on the property. The family must document the financial reason for nonpayment. At the time of the eligibility decision, the household must have and document income sufficient to support the household and repay the loan. There is a fee for the credit check and property search.

**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.

**FILED**

JUL 10 2012

Clery/Clerk/Esq

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

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
PASSAIC COUNTY

DOCKET NO.: F-009564-12

CIVIL ACTION

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 for good cause shown;

3. Wells Fargo will serve the corrected NOI, the Explanatory Letter and a copy of this Order to Show Cause (collectively, the "OSC Package"), via certified mail, return receipt requested and regular mail at the last known address of the Foreclosure Defendant. For purposes of this Order to Show Cause, Wells Fargo may serve each marital couple residing at the same address with one OSC Package via certified mail and regular mail.<sup>1</sup>

4. A copy of Wells Fargo's complete application to this Court shall be loaded onto the New Jersey Courts website within 5 days of the date of this Order where it will be available for review by the general public at the website link - <http://www.judiciary.state.nj.us/>.  
*and all attachments will be provided in searchable PDF'S FILES*

5. In addition to providing service of the OSC Package by certified and regular mail, Wells Fargo will, within 2 days *Rec'd to Sept 1, 2012* of the ~~date of this Order~~, provide publication notice two (2) times in each of the following four (4) daily newspapers in a manner consistent with similar legal notices:

*Star Ledger, Bergen Record, The Press of Atlantic City, Gloucester County Times*

6. Wells Fargo shall file with the Court its proof of service of the OSC Package on Foreclosure Defendants on the Corrected NOI List in the manner consistent with this Order no later than nine (9) days before the return date.

7. You [Foreclosure Defendants] have the right to object in this proceeding to this Order to Show Cause (the process by which this Court gave Wells Fargo permission to serve the corrected NOI). To do so, you must file a written objection under the docket number listed on the first page of this Order for this case. You must set forth with specificity the basis for your objection and file your objection with the Superior Court Clerk's Office at the following address

within        days: *on or before September 24, 2012.*

<sup>1</sup> In the event Wells Fargo has been provided an address for the estate of a deceased Foreclosure Defendant, the OSC Package shall be mailed to the address of the estate and/or the executor or administrator, if known and available.

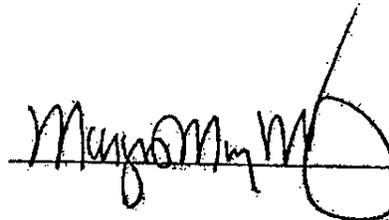
Superior Court in Mercer County, with a copy to Judge McVeigh and to each Foreclosure Defendant who filed an opposition.

10. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided with the corrected NOI.

11. A proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court by Wells Fargo no later than nine (9) days before the return date.

12. The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause.

13. In the event a foreclosure action has been suspended or stayed as a result of a bankruptcy filing or loss mitigation activity, the OSC Package shall not be sent unless and until the suspension or stay is lifted. In such circumstances, the following procedure shall be used. Wells Fargo shall mail the OSC Package within 45 days of the lifting of the stay or suspension of the foreclosure action. You [Foreclosure Defendants] will have 30 days in which to object to the corrected NOI or 30 days from service of the OSC Package to cure your default. Any objections to the relief set forth in this Order to Show Cause shall be made in writing to the Court in the County in which your foreclosure action is pending. You must also send a copy of your written papers to Wells Fargo's attorneys, Mark Melodia, Esquire, Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, New Jersey 08540, or the Court handling your foreclosure action will not be able to consider your objection.

  
\_\_\_\_\_  
J.S.C.

AMOUNT DUE SCHEDULE

Note Dated: May 26, 2006  
Mortgage Dated: May 26, 2006  
Recorded on: June 15, 2006, in BERGEN County, in Book 16024 at Page 101  
Property Address: 180 LINDBERGH BOULEVARD TEANECK, NEW JERSEY 07666  
Mortgage Holder: MICHELLE GERMAN

Unpaid Principal Balance as of April 1, 2008 \$ 488,862.98

Interest from March 1, 2008 to June 30, 2009 \$ 58,638.42

(Interest rate = 8.99% per year; \$ 120.41 per day x 486 days)

Late charges from April 1, 2008 to July 16, 2008  
(\$ 198.97 per mo. X 3 months =) \$ 596.94

Advances through June 30, 2009 for:

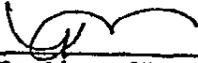
Real Estate Taxes	\$ 10,851.72
***see attached breakdown***	
Hazard Insurance	\$ 2,042.00
Mortgage Insurance Premiums	\$ 0.00
Inspections	\$ 0.00
Winterizing/Securing	\$ 90.00
Sub-Total of Advances	\$ 12,983.72
Less Escrow Monies	(\$0.00)
Net Advances	\$ 12,983.72

Interest on advances from \_\_\_\_\_ to \_\_\_\_\_ \$ 0.00

Other Charges (specify) Prior Accum. Late Charge \$ 397.91

Total due as of June 30, 2009 \$ 561,479.97

Date: June 10, 2009

  
\_\_\_\_\_  
Xee Moua, Vice President of Loan Documentation  
Signature of Lender or Servicing Agent

Surplus Money: If after the sale and satisfaction of the mortgage debt, including costs and expenses, there remains any surplus money, the money will be deposited into the Superior Court Trust Fund and any person claiming the surplus, or any part thereof, may file a motion pursuant to Court Rules 4:64-3 and 4:57-2 stating the nature and extent of that person's claim and asking for an order directing payment of the surplus money. The Sheriff or other person conducting the sale will have information regarding the surplus, if any.

Michelle German  
180 Lindbergh Blvd  
Teaneck, NJ 07666  
(917) 499-3359

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE FOR FIRST  
FRANKLIN MORTGAGE LOAN  
TRUST, 2006-FF11

PLAINTIFF  
VS  
MICHELLE GERMAN, ETAL  
DEFENDANT

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION BERGEN COUNTY

DOCKET NO: F-27172-08

TO: SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION, BERGEN COUNTY  
10 MAIN ST, HACKENSACK, NJ

In addition to the Reply Brief, I am also RESERVING a copy of my first **Objection** to OSC for ASC NOI under Docket # F-009564-12, originally served September 24, 2012, along with a copy of my: NOTICE OF AFFIDAVIT OF INFORMATION: FROM A THIRD PARTY OF INTEREST, WHO HAS BEEN EXCLUDED FROM YOUR LIST, OF THOSE WHO ARE DEEMED QUALIFIED TO RECEIVE A CORRECTED NOI/NOTICE OF INTENT TO FORECLOSE is being submitted for filing under docket number F-27172-08.

Dated: 1/21/13

Respectfully submitted,

  
MICHELLE GERMAN

**DOCKET # F009564-12**  
**DOCKET # F 27172-08**

**NOTICE OF AFFIDAVIT OF INFORMATION:  
FROM A THIRD PARTY OF INTEREST, WHO HAS BEEN EXCLUDED FROM  
YOUR LIST, OF THOSE WHO ARE DEEMED QUALIFIED TO RECEIVE A  
CORRECTED NOI/NOTICE OF INTENT TO FORECLOSE**

NOTICE: Of Affidavit of Information from a third party of interest, who has been excluded from your list, of those who are deemed qualified to receive a corrected NOI.

I, Michelle German, am the defendant by fraud, under Docket # F27172-08, did file an Objection to the NOI OSC, under Docket # F009564-12 of MOTION FOR CORRECTED NOTICES OF INTENT TO FORECLOSE. The attorneys for Foreclosure Plaintiffs have responded to my objection and have requested from the Court that it be stricken from the Record; I would like it on Record that I OBJECT to my Objection being stricken from the Record. In conjunction with my original Objection, I, hereby, submit this Notice of Affidavit of Information as a third party of interest.

The plaintiff in my case alleges to have filed his summons and complaint on 7/16/08. His Notice Motion, the motion used by the plaintiff to substantiate that he timely and duly filed his Notice of Intent to Foreclose. The NOI/Notice Motion is on the Docket Record dated 7/28/09. More than a year after the complaint was filed and not 30 days before complaint was filed as required by FFA §6 and 41 P.S. §403a,b, c & d. On 10/05/09 I filed in Court and served on Plaintiff, a Contesting Answer in Writing. Which is shown on the Docket Record as Answer, in that Answer I made the following statement: "As my Answer to the allegations made in the complaint (by plaintiff) I offer the following: I was never served with a Notice of Intent to Foreclose by the plaintiff in any lawful process. Or in any legal way, that would afford me the opportunity to respond or resolve the issue/dispute in a fair, lawful and timely manner."

On 10/08/09 one of my Contesting Answers is finally, **on and in** the Docket Record but is incorrectly entered on the Record as being received on 10/8 and not 10/05/09. In addition, my Contesting Answer was also mislabeled and titled on the Docket Record as an Answer and not as a Contesting Answer. The proof of mail, for this entry, is dated 10/21/09, with the **WRONG FILING PARTY** erroneously entered **on** the Docket Record. Through computer fraud within the system, the plaintiff is claiming on the Docket Record to have mailed my Contesting Answer. At that time, this was the only answer contesting or otherwise, that we were able to get entered on the Record. This deceptive unlawful act of changing the name of the filing party, committed by the plaintiff, effectively voided my Contested Answer and seriously injured any opportunity I had of settling this dispute.

The law states where there is no proof of mail by either filing party, that submission is **void on its face** and there is no proof of mail for me **on** the system for this Contesting ANSWER. The Court Record system provided us with a stamped Court photocopy of the supporting documents for this service and it is proof of service submitted **by me**. Indicating that the correct information is **in** the Docket Record System but is being suppressed from recording **on** the Docket Record and/or is possibly being fraudulently **overridden** with the **wrong filing party**. In our files we have a personally served Court stamped different Answer, dated 7/15/09. We also have a Court stamped photocopy of an Affidavit of Service dated 7/22/09 for another different Answer and return receipts for yet a third different Answer. None of these four contesting answers are **on** or **properly in** the Docket Record. The three unrecorded answers and the voided contested Answer

were all verifiably submitted to the Court **before** the plaintiff applied for or was approved for his unsigned (and never signed) Final Judgment Order entered on the Record on 7/27/09.

This Unlawful UNSIGNED Final Judgment Order according to the Foreclosure Plaintiff's Attorneys (attorneys for a long list of banks); their BRIEF, dated 10/25/2012, SUMMARIZING THE RESPONSES MADE BY WELLS FARGO TO THE INDIVIDUAL SUBMISSIONS AND OBJECTIONS, is the document that my NOI relied upon for its legitimacy. On 9/25/09 in what purported to be a lawful court proceeding, I was denied due process and all opportunity of ever curing the debt. During that proceeding, the presiding Judge, Judge Koblitz deceptively tricked me, by vacating the default against me, while telling me that she was not vacating the default against me, but that she was actually vacating the default against my non-existing husband. She explained her actions by stating that it was customary for the banks to place a husband's name in the caption, as a precaution, in the surname of the woman just in case the fictitious husband has an interest. She explained that banks do this to protect themselves whenever a mortgage is given to a single woman. However, when I received the Judge's Order only my name as the defendant was on the Order. When I questioned the judge's law clerk as to why my non-existing husband was not on the Order, she replied that ordinarily the Court did not put the husband's name on the Order, but instead removed it from the Record. On the same Order the Judge tricked us into submitting an Answer to the Plaintiff Complaint, by ordering us to do so, within 10 days. When we complied with the Court's Order, the Court regained the jurisdiction that they had lost, when the Judge granted the default. But they lost it again, since the case was now void because the legally required default was no longer in the system.

Several months passed before the 9/25/09 Order was placed **on** but not **in** the Record. At that time, the Superior Court's, Foreclosure Office was filled with hundreds of boxes that were purportedly full of legal documents; stacked almost ceiling high. Representing the Foreclosure's Office testimony of their allegation of being seriously backlogged in posting their information **on** and **into** the Docket Record. When I finally got the opportunity to view the 9/25/09 Order on the Docket Record. The information recorded on the Docket Record, was different than the information on the Order I received from the Court on the day of the proceeding. The Order on the Docket Record, dated 9/25/09 was titled ORD VC DF EX TM. When I inquired of court personnel requesting an interpretation of *what the abbreviation meant*, I was told the following: Order Vacating Default, and I don't know what EX TM stands for. Unless EX TM represents my non-existing husband's name, then I don't know what it stands for either. But what I do know is whatever it stands for, EX TM was not on the 9/25/09 Order given to me. We were not able to view or secure a copy of the supporting documents for a voluntary dismissal entry entered on the Docket Record of my case on 10/30/08, until sometime late in 2012. Once verified, our suspicions were confirmed, the non-existing husband was vacated on 10/30/08, for not being a proper party to the case and the default was actually vacated for the defendant, Michelle German, the only defendant listed in the case.

The Judge committed a serious crime, when she fraudulently misled me by telling me that she was not vacating the default against me, when she did. When she put in the Order vacating the default, she left my case open and active, and without a default in or on the Record, from 9/25/09 through 5/3/10. Without a default on the Record to turn into a default judgment, the system could not recognize a request to issue a **Final Judgment package**; therefore I could never cure the debt. The plaintiff and the court realizing their dilemma, of requiring a default to be **in** the Record before their **Final Judgment package** could be approved and/or granted; resolved their problem on 5/3/10 when they snuck a forged/fictitious default **into** the Docket Record system as a supporting document, while *taking care not to link this forged default (supporting document)* to any entry already on the Docket Record; which would connect them to the forged default. This forged document is hidden in the Docket Record, as the supporting document for an entry for an Affidavit of Service filed on 5/3/10, by the plaintiff, but fraudulently changed or switched in the system, and appears on the Docket Record showing the **wrong filing party**. Again the Plaintiff is displaying his own sadistic brand of justice by illegally and/or unlawfully claiming on the Record that the defendant served herself with the Plaintiff's forged default. The Judge, who signed the unlawful Final Judgment Order, dated and signed the Order on the wrong day. Since she attempted to execute her Order on 5/3/10, on the same day she ordered it, but possibly before the forged default was placed in the system. Because the Final Judgment Order signed on 5/3/10 was **not** placed on the Record until 5/6/10 it was therefore not timely or duly filed, making the Final Judgment Order dated 5/3/10; void on its face. I have two Final Judgment Orders entered on the Record in my case neither is valid; and both are void. Therefore, the plaintiff's attorneys cannot classify my case, as a post-judgment case. Since I never received a legal/lawful Order that was properly adjudicated, just as I never received a legal or lawful Notice of Intent to Foreclose, this puts my case (I believe, or certainly hope so) in a unique category.

An obvious automatic 'check and balance' system's check is either **missing** or being **suppressed** in the JEFIS (Docket Record) system. Since the Notice Of Intent to Foreclose/NOTICE MOTION is entered on the Record on 7/28/09, **the day after** he, the plaintiff, had applied for or was approved for, we don't know which one, but there is an entry made on the Record, **dated 7/27/09**, for a **Final Judgment package**. The Record reveals that the **final judgment** was already on the Record before I received my NOI. In as much as, there were several documents missing from my file; it would be normal to assume that the Court's JEFIS (system) (Docket Record system) should at the very least contain, an adequate system's check. Which confirms and/or verifies that all required documents are **on** and **in** the Docket Record system, in their proper sequence, before issuing a Final Judgment package.

Because all four of my contesting answers was either suppressed or kept off the Record; my case was categorized **in** and **on** the Court Records (Docket Record) utilized by the plaintiff's system, as an uncontested action. Because of that classification my case was erroneously identified by the plaintiff's system, as one qualifying for their newly created NOI Action; that I am again, now responding too.

The plaintiff never served me with an NOI, titled a NOTICE MOTION on the Docket Record, and entered on the Record 7/28/09 several months after plaintiff filed his Foreclosure Complaint. According to the voluminous amount of fraudulent backdated documents placed and filed **into** the Record (documents dated in 2008 and not placed **on** the Record until 2009 or 2010 to support plaintiff's Notice Motion/NOI). The Record discloses that plaintiff did not even attempt to file his first unlawful Notice of Intent to Foreclose dated 11/13/08 until more than four months after filing his complaint. The FFA§6 was not enclosed with plaintiff's NOI/NOTICE MOTION dated 6/25/09, which was not entered on the Record until 7/28/09.

There is no proof of mail, for this NOTICE MOTION/Notice of Intent to Foreclose for any year, **in** or **on** the Docket Record. However, we do have in our file, an original unstamped copy of a CERTIFICATION OF MAILING OF NOTICE PURSUANT TO SECTION (6) OF THE FAIR FORECLOSURE ACT, (enclosed as an exhibit), cert dated 12/23/08, which included the FFA§6 NOTICE, dated 11/13/08. The FFA§6 NOTICE, dated 11/13/08 contained the following statement: "You are hereby notified that DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN MORTGAGE LOAN TRUST 2006-FF11, the plaintiff in the above captioned matter, is now ready to submit its proof to the Superior Court Foreclosure Unit for entry of a Final Judgment of Foreclosure, relating to the **within** matter." My Notice of Intent to Foreclosure is stating that it is a Notice for entry of Final Judgment and not a 30-day Notice of intent to foreclose as required by the FFA§6. This belated NOI is now informing me of the NOTICE of FFA§6 years after the fact. On the Docket Record dated 5/3/10 the same certification with its attached NOTICE of FFA§6, is fraudulently used as the supporting document for an Affidavit of Service incorrectly shown **on** the Docket Record with **wrong filing party** as Michelle German, the defendant.

Upon analysis of Docket Record dated 9/14/10 we discovered that the plaintiff, at that time was shown as the filing party on all three entries for his unlawful Affidavits of Services filed on 5/3/10. However, sometime before 5/30/12 the plaintiff/court fraudulently switched or changed in the Docket Record system the names of the filing party, from the bank's name into the defendant's name. This sadistic act by the plaintiff/court effectively states on the Record that the defendant served plaintiff's fraudulent Notice of Intent to Foreclose on herself! The plaintiff is flaunting his ability and easy access to the court's system, of being granted the privilege to commit computer fraud, in my case whenever he so desires. I have deliberately laid-out a significant amount of fraud, focusing mainly on the many issues that involved me being properly and timely served with a Notice of Intent to Foreclose. The Plaintiff's Attorneys BRIEF, dated 10/25/2012, was mailed just before the destructive Hurricane Sandy and was not received by me until after November 6, 2012. After receiving and reviewing the Plaintiff's Attorneys BRIEF, SUMMARIZING THE RESPONSES MADE BY WELLS FARGO TO THE INDIVIDUAL SUBMISSIONS AND OBJECTIONS, I analyzed the categorization, of these submissions and objections received by the plaintiff's attorneys. After studying the plaintiff's attorneys Statistical Summarization it appeared to me that the attorneys viewed the defendants and/or people who have suffered considerable grief

from the threat or from the actual lose of their homes as if they were winged insects. Insects, forced to allow their wings to be removed, in order to be dissected, so that their wings can be repaired. Because the attorney's brief only addressed what some would consider, as two insignificant issues, which are - that there are only two valid bases for objection in this proceeding: First, Foreclosure Defendants could object to this OSC process, and Wells Fargo's request to issue corrected NOIs in order to cure the failure to include the name of the lender and lender's address in the previously served NOIs; and second, Foreclosure Defendants had the right to raise individual objections to the content of the Corrected NOIs served on them. It is stated within one of the bases that you can object, but when I objected to the OSC process, the plaintiff's attorneys responded with a request to the Court to strike my objection from the Record? Because the brief's does not focus on systematic problems, inherent within the JEFIS (Docket Record) system, it is not acknowledging that it is the system, which actually governs the case. It merely mentions systems errors, omissions, deletion, additions and any other 'minor' systems problems; the brief informs that these types of problems should be handled in your existing case. The brief does not recognize serious systems problems, like the ones in my case, expressed and disclosed in this Notice.

Even though in one of its footnotes (4) Plaintiff's attorneys stated the following: Some of the JEFIS dockets are not up to date and/or are not accurate and we therefore worked with foreclosure counsel to compare results and understand the actual status of the various cases. The attorneys for plaintiff have decided to duck the bullet and dissect the insect. Since they did not make a direct assault on any of their noted problems big or small, within the JEFIS system. By at least attempting to investigate to determine what resources are needed to address the system's problems. Instead the attorneys did, what attorney do, they turn to each other for the answers. This is a little shortsighted since there is no long-term solution in their answer. Of equal importance in their statement they appear to be requiring the defendants that they are choosing to work with, to have counsel or an attorney. I am pro se and my family members are my counsel apparently we have more faith in the Judicial system, than the attorneys do, since we actually expended the resources and the time, in an effort to Correct the Record. After two years of trying, we realize that under the present circumstances it is not possible to correct the Record. But during the process we demonstrated to ourselves that we had and still have the right to believe what the law states, that any filing party have the right to correct the Record. In good faith and with strong commitment, we made an honest effort of trying to correct the Record; while attempting to bring some honesty and truth into my personal Record. Though we were and still are being denied at every turn, and plagued by every deceptive, mean spirited trick, imaginable and unimaginable we will continue to submit our pleadings in good faith.

The attorneys for plaintiff footnote are somewhat vague, since it does not give enough specific information. For example, how many & what percentage of JEFIS dockets are not up to date and/or are not accurate?

There are many defendants who do not fit neatly into your categories, yet your system has raked us all in, and now that we are here, there is a recognition that there is an error, that is a fundamental flaw, of non-recognition of defendants who never received an NOI and can prove it. You cannot correct what you never received and according to law if you didn't receive an NOI, your case should be dismissed. Why is your process excluding people who never received an NOI? Why is your process not working harder to assist contesting defendants, or even to recognize them. I am not the only one with insurmountable fraud in my case; somebody got to stand up, why are you not willing to help them stand up? You indicate in your brief that you have been able to help some defendants to have their case dismissed. *Your brief failed to give any statistics concerning how many people are like me and never received an NOI we need to know.* I disclosed as much fraud as I thought could be stomached in the hope that the system would recognize people who never received an NOI, this violation of the law, should entitle me to be included with any group being considered for dismissals. How can what you are doing help to curb fraud in JEFIS?

The plaintiffs boast of a large sampling of 4,277 defendants as participates in his, Statistical Summarization. I was not one of the people who it was deemed necessary to receive the exhibits for this brief, I only received the summary, but I believe the exhibits would have been helpful to my understanding. As a result of having so many participants it became necessary for the plaintiff's attorney to hire a company to pull and print the 4,277 JEFIS Dockets on the Corrected NOI List; in preparation for the attorney to review and determine the status of these cases. Somewhere in that brief it stated that all 4,277 cases was pulled, printed and analyzed. I am happy to hear that, because it must mean that an analysis of my case must also be included. I would love to know if the results of your analysis are the same as mine. Did your analysis see that huge mountain of an insurmountable amount of fraud in my case like I have disclosed here in this Notice? If you see it, can you in good conscience continue to turn a blind eye to injustice? It is impossible for someone to look at my case without pointing out the fraud. I point it out in my pleadings, constantly, and we are ignored constantly. Your solution is to send us back, the defendants, to the same people who control and contribute to the problems we are seeking resolution from. We cannot ask the guilty parties, who use the courts as an engine of fraud to work against themselves.

For these stated reasons, the underlining action (brief) supporting the Plaintiff's OSC/MOTION may be considered too narrow, and too constricted to provide an actual solution to the much larger legal problems involved, in the NOI process

I made this Notice of Information because I believe it is important for the public to participate in our Judiciary system, have faith in it and continue to make it accountable to the people. In addition I would like a copy of the information you have gathered around my case.

IN GOD WE TRUST

Michelle German



ASC-7074  
PHELAN HALLINAN & SCHMIEG, PC  
400 Fellowship Road, Suite 100  
Mt. Laurel, NJ 08054  
(856) 813-5500  
Attorneys for the Plaintiff

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE FOR FIRST  
FRANKLIN MORTGAGE LOAN TRUST 2006-  
FF11

PLAINTIFF,

VS.

MICHELLE GERMAN, ET AL.

DEFENDANT(S)

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
BERGEN COUNTY

DOCKET NO: F-27172-08

CIVIL ACTION

NOTICE OF MOTION FOR ENTRY OF  
JUDGMENT

TO: Michelle German  
180 Lindbergh Boulevard  
Teaneck, NJ 07666

Michelle German  
c/o Clerk of the Superior Court of New Jersey  
CN-971 Hughes Justice Complex  
Trenton, NJ 08625

PLEASE TAKE NOTICE that, the undersigned, attorney for Plaintiff, will make application to the Superior Court of New Jersey, Chancery Division, at the Hughes Justice Complex-CN971, Trenton, New Jersey, for Entry of Final Judgment in the above foreclosure action. You are receiving this Motion and copy of Plaintiff's Proof of Amount Due: (a) in accordance with R.4:64-9; (b) because you have filed an Answer or appeared in the above action, or (c) because Plaintiff failed to enter Judgment within the required six (6) month period following the entry of default pursuant to the rules of the Superior Court of

New Jersey. Plaintiff is filing herewith its proof required by law, which proof will establish that there is due upon the plaintiff's mortgage on 180 LINDBERGH BOULEVARD, TEANECK, NEW JERSEY in the sum of \$561,479.97 plus costs and attorney's fees to be taxed. The Order/Judgment sought shall be at the discretion of the Court unless you proceed as directed below.

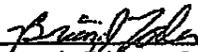
PLEASE TAKE FURTHER NOTICE THAT IF YOU WISH TO OBJECT TO THIS MOTION YOU MUST DO SO IN WRITING WITHIN 10 DAYS AFTER YOU RECEIVED THIS MOTION. YOU MUST FILE YOUR OBJECTION WITH THE OFFICE OF FORECLOSURE, P.O. BOX 971, 25 MARKET STREET, TRENTON, NJ 08625 AND SERVE A COPY ON THE MOVING PARTY.

THE OFFICE OF FORECLOSURE DOES NOT CONDUCT HEARINGS, YOUR PERSONAL APPEARANCE AT THE OFFICE WILL NOT QUALIFY AS AN OBJECTION. IF YOU FILE AN OBJECTION, THE CASE WILL BE SENT TO A JUDGE FOR RESOLUTION. YOU WILL BE INFORMED BY THE JUDGE OF THE TIME AND PLACE OF THE HEARING ON THE MOTION.

Annexed hereto, please find a copy of the Certification of Amount Due.

PLEASE TAKE FURTHER NOTICE that at said time and place if you are a lienholder/mortgagor that filed an answer are required to present proof of the amount due to you on the encumbrance set forth in your Answer along with your original documents to be marked as exhibits.

PHELAN HALLINAN & SCHMIEG, PC

  
\_\_\_\_\_  
Rosemarie Diamond, Esquire  
Vladimir Palma, Esquire  
Brian J. Yoder, Esquire  
Brian Blake, Esquire  
Thomas M. Brodowski, Esquire

Date: June 25, 2009

M GERMAN - Docket # F009564-12  
PHELAN HALLINAN & SCHMIEG, PC

400 Fellowship Road, Suite 100

Mt. Laurel, NJ 08054

(856) 813-5500

Fax: (856) 813-5501

Rosemarie Diamond, Esquire  
Managing Attorney for New Jersey

Representing Lenders in  
Pennsylvania and New Jersey

June 24, 2009

Michelle German  
180 Lindbergh Boulevard  
Teaneck, NJ 07666

Michelle German  
c/o Clerk of the Superior Court of New Jersey  
CN-971 Hughes Justice Complex  
Trenton, NJ 08625

RE: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST  
FRANKLIN MORTGAGE LOAN TRUST 2006-FF11 vs. MICHELLE GERMAN, et al.  
Docket No.: F-27172-08  
Our File No.: ASC-7074

Dear Sir/Madam:

Service is hereby made upon you with the enclosed Notice of Motion for Entry of Final  
Judgment, relative to the above referenced-matter.

Very Truly Yours

*Lisa Wilson*

lw

Regular and Certified Mail, Return Receipt Requested



And lawful interest thereafter on the total sum due plaintiff together with costs of this suit to be taxed including counsel fee of \$ \_\_\_\_\_ raised and paid in the first place out of the mortgaged premises,

And it is further ordered that the plaintiff, its assignee or purchaser at sale recover against the following defendants:

**MICHELLE GERMAN**

and all parties holding under said defendants the possession of the premises so mentioned and described in the said Complaint and Amendment with the appurtenances; and it is further

ORDERED and ADJUDGED that the mortgaged premises be sold to raise and satisfy the several sums of money due, in the first place to the plaintiff, DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR FIRST FRANKLIN MORTGAGE LOAN TRUST 2006-FF11, in the sum of \$561,479.97 together with contract and lawful interest thereon to be computed as aforesaid, the plaintiff's costs to be taxed, with interest thereon, and that an execution for the purpose by duly issued out of this Court directed to the Sheriff of BERGEN County, commanding said Sheriff to make sale according to law of the mortgaged premises described in the Complaint, and out of the money arising from said sale, that said Sheriff pay in the first place, to the plaintiff, said plaintiff's debt, with interest thereon as aforesaid and said plaintiff's costs with interest thereon as aforesaid, and in case more money shall be realized by the said sale than shall be sufficient to satisfy such several payments as aforesaid, that such surplus be brought into this Court to abide the further Order of this Court and that the Sheriff aforesaid make a report of the aforesaid sale without delay as required by the rules of this Court, and it is further

*Docket # F00956412*

ORDERED and ADJUDGED that the defendants in this cause, and each of them stand absolutely debarred and foreclosed of and from all equity of redemption of, in and to said mortgaged premises described in the Complaint, when sold as aforesaid by virtue of this judgment

This judgment shall not affect the right of any person protected by the provisions of the New Jersey Tenant Anti-Eviction Statute (N.J.S.A. 2A: 18-61.1 et seq.)

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Docket # F009564-12

ASC-7074

**PHELAN HALLINAN & SCHMIEG, PC**

By: Rosemarie Diamond, Esq.

400 Fellowship Road, Suite 100

Mt. Laurel, NJ 08054

(856) 813-5500

Attorneys for Plaintiff

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE FOR FIRST  
FRANKLIN MORTGAGE LOAN TRUST 2006-  
FF11  
PLAINTIFF

VS.

MICHELLE GERMAN, ET AL  
DEFENDANT (S)

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
BERGEN COUNTY

DOCKET NO: F-27172-08

CIVIL ACTION  
CERTIFICATION OF MAILING OF NOTICE  
PURSUANT TO SECTION (6) OF THE FAIR  
FORECLOSURE ACT

I, Michelle Laskowski, do hereby certify:

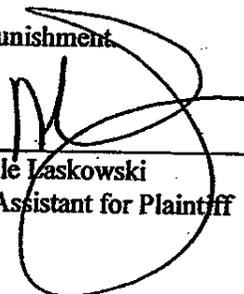
1. I am a legal assistant at the law firm of Phelan, Hallinan & Schmieg, P.C., attorneys for the plaintiff in the above-entitled action.
2. On 11/13/08 this office did mail a Notice Pursuant to Section 6 of the Fair Foreclosure Act to the mortgagor(s), MICHELLE GERMAN, , in the above entitled action, by regular and certified mail to the mortgaged premises located at 180 LINDBERGH BOULEVARD, TEANECK, NEW JERSEY 07666 AND ASLO TO, C/O CLERK OF THE SUPERIOR COURT, CN-971, HUGHES JUSTICE COMPLEX, TRENTON, NJ, 403 QUINCY STREET, BROOKLYN, NY, 90 VERMONT STREET, BROOKLYN, NY AND 4 RIDGEVIEW AVENUE, ATLANTIC HIGHLANDS, NJ advising them that the Plaintiff intends to proceed with the entry of judgment and that in the event they do not notify the Plaintiff within ten (10) days upon receipt of a reasonable likelihood of an ability to cure the default within 45 days of the notice, Judgment would be entered and that they will lose their right to cure the default on the Mortgage pursuant to Section 5 of

the Fair Foreclosure Act

3. More than ten (10) days have passed from the date of the receipt of the mailing of the Notice Pursuant to Section 6 and no response has been received; therefore, Plaintiff requests that Final Judgment be entered.

4. I hereby certify that the foregoing statements made by me are true and I am aware that if any of the foregoing statements made by me are false, I am subject to punishment.

By:

  
\_\_\_\_\_  
Michelle Laskowski  
Legal Assistant for Plaintiff

Dated: 12/23/08

**CERTIFICATE OF SERVICE**

I, Gloria Bolden being duly sworn, disposes and says that deponent is upward of the age of eighteen years and resides at 403 Quincy St., Brooklyn, NY 11221, do hereby Certify that on January 11, 2013 I am also RESERVING a copy of my first **Objection** to **OSC** for **ASC NOI** under Docket # F-009564-12, originally served September 24, 2012, along with a copy of my: **NOTICE OF AFFIDAVIT OF INFORMATION: FROM A THIRD PARTY OF INTEREST, WHO HAS BEEN EXCLUDED FROM YOUR LIST, OF THOSE WHO ARE DEEMED QUALIFIED TO RECEIVE A CORRECTED NOI/NOTICE OF INTENT TO FORECLOSE**, faxed to the Court and Plaintiff on 11/14/12, served on behalf of Michelle German, Docket # F-27172-08, to the following parties by:

regular mail    **certified mail**    personal

SUPERIOR COURT OF NEW JERSEY  
10 Main Street  
Hackensack, New Jersey,

Judge McVeigh, J.S.C., Superior Court  
Of New Jersey, Chambers 100, 71 Hamilton Street,  
Paterson, New Jersey 07505.08540

Randy Brockenstedt, Senior Vice President  
America's Servicing Co.  
3480 Stateview Boulevard  
MAC X 7802-03H  
Fort Mill, SC 29715

APPEALS DIVISION  
ATTN: JULIE GOLDING  
SUPERIOR COURT CLERK'S OFFICE  
FORECLOSURE PROCESSING SERVICES  
P.O. Box 971  
TRENTON, NEW JERSEY 08625

Mark S. Melodia, Esquire,  
Reed Smith LLP, Princeton Forrestal Village,  
136 Main Street, Princeton,  
NEW JERSEY 08540

SUPERIOR COURT CLERK'S OFFICE  
FORECLOSURE PROCESSING UNIT  
HUGHES JUSTICE COMPLEX  
25 MARKET STREET, CN 971  
TRENTON, NEW JERSEY 08625

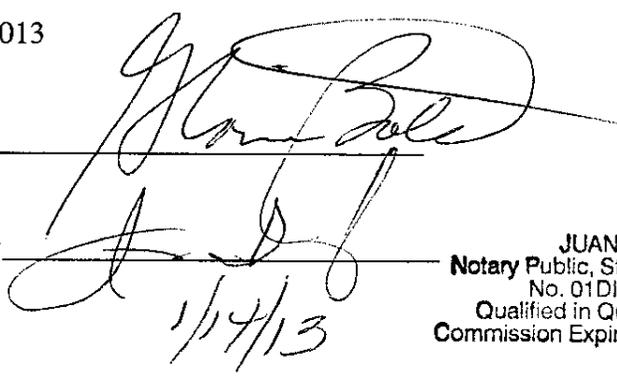
PHELAN HALLINAN & SCHMIEG, PC  
400 Fellowship Road, Suite 100  
Mt. Laurel, NJ 08054

SCHIMBERG & FRIEL PC  
20 Brace Road, suite 350  
Cherry Hill, New Jersey 08034

Dated January 11, 2013

By: Gloria Bolden

Sworn to before me:



1/14/13

JUAN DIAZ  
Notary Public, State of New York  
No. 01DI6129505  
Qualified in Queens County  
Commission Expires June 27, 2013