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ZUCKER, GOLDBERG & ACKERMAN, LLC
200 Sheffield Street, Suite 101
P.O. Box 1024
Mountainside, New Jersey 07092-0024
(908) 233-8500
Attorneys for Plaintiffs

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY MIDFIRST BANK	SUPERIOR COURT OF NEW JERSEY PASSAIC COUNTY CHANCERY DIVISION Civil Action Docket No: F-12399-12 **ORDER TO SHOW CAUSE TO PROCEED SUMMARILY PURSUANT TO R. 4:67-2**

THIS MATTER being brought before the court by the law firm of Zucker, Goldberg & Ackerman, L.L.C., attorneys for plaintiff, MidFirst Bank, seeking relief by way of summary action as set forth in Chief Justice Stuart Rabner's April 4, 2012 Order and based upon the facts set forth in the Amended Verified Complaint filed herewith; and the Court having determined that this matter may be commenced by Order to Show Cause as a summary proceeding pursuant to R. 4:67-2 and for good cause shown;

IT IS on this _____ day of _____, 2012,

ORDERED that the parties in interest listed in Exhibits A, B, C and D of the Amended Verified Complaint appear and show cause on the _____ day of _____, 2012 before the Honorable Margaret Mary McVeigh, P.J.Ch., Superior Court, Passaic County, Chancery Division, at 71 Hamilton Street, Paterson, N.J. 07505 at _____ o'clock, why judgment should not be entered as follows:

A. Declaring Plaintiffs' Form Notice of Intention to Foreclose to be compliant with the requirements of the Fair Foreclosure Act; and

B. Allowing MidFirst to send new Notices of Intention to Foreclose, giving the borrower(s) at least thirty days from the date the letter is mailed to cure the default on the mortgage without having to pay legal fees or costs; and

C. Granting such other relief as the court deems equitable and just.

IT IS FURTHER ORDERED that:

1. Plaintiff shall serve a copy of this Order to Show Cause and Amended Verified Complaint (without exhibits) upon all individuals obligated on the Note secured by a Mortgage on residential property that is the borrower's, or their immediate family's, principle residence. Service shall be effectuated by certified mail return receipt requested and regular mail to the property address and the last known address (if different) in plaintiff's records.

2. A copy of this Order to Show Cause and Amended Verified Complaint shall be posted on the Judiciary Web Page at http://www.judiciary.state.nj.us.

3. A true copy of this Order to Show Cause, Amended Verified Complaint, and Amended Certification of Thad Burr, shall be served upon the parties in interest listed in Exhibits A, B, C and D to the Amended Verified Complaint, by certified mail, return receipt requested (or by registered mail, return receipt requested with respect to any party in interest who resides outside the United States) and regular mail.

4. Along with this Order to Show Cause, Plaintiff may serve the corrective Notice of Intention to Foreclose allowing the borrower at least thirty days to cure the default on the subject mortgage without having to pay attorneys fees or costs, in a form as set forth in Exhibit "1" of the Amended Certification of Thad Burr. Plaintiff shall also serve a Cover Letter in the form set forth in Exhibit "F" of the Amended Certification of Brian C. Nicholas, Esq.

   a. For any borrower in an active Bankruptcy case where the provisions of the automatic stay are still in place, Plaintiff may serve a copy of this Order to Show Cause and Amended Verified Complaint but may choose to delay serving a corrective Notice of Intention to Foreclose until such time that the stay

is vacated, if it believes that doing so will violate the automatic stay.

b. If the Court grants final relief on the return date of this Order to Show Cause and plaintiff has not already sent a corrective Notice of Intention to Foreclose, Plaintiff shall serve the corrective Notice of Intention to Foreclose once the provisions of the automatic stay in the bankruptcy case are no longer in place. In the alternative, Plaintiff may apply to the United States Bankruptcy Court for relief from the provisions of the automatic stay to effectuate service of the corrective Notice of Intention to Foreclosure pursuant to this Order.

c. In the event that plaintiff does not serve a corrective Notice of Intention to Foreclose with this Order to Show Cause, Plaintiff may not proceed with a foreclosure action until such Notice of Intention is served as authorized by this Court's Order.

d. If plaintiff believes that service of this application will be a violation of the provisions of the automatic stay, once the stay is vacated, plaintiff may file a motion with the Chancery Judge in the vicinage where there property lies requesting permission to send a new NOI. Plaintiff shall not

be required to file a new Order to Show Cause for cases currently in bankruptcy.

5. Plaintiff shall publish the legal notice of this action as set forth in Exhibit "E" to the Amended Certification of Brian C. Nicholas, Esq. on at least two days prior to _____ in the following newspapers:

a. Star Ledger
b. Bergen Record
c. The Press of Atlantic City
d. The Gloucester County Time

6. The Court will only entertain objections to the process outlined in the Supreme Court's April 4, 2012 Order. Any party in interest who wishes to object to the process shall file the objection under the docket number for this Order to Show Cause, **in writing**, with the:

Clerk of the Superior Court, Foreclosure Processing Services
Attn: Objection to Notice of Intention to Foreclose
25 Market Street
P.O. Box 971
Trenton, New Jersey 08625-0971

A copy of the objection to the Order to Show Cause must also be sent to:

Honorable Margaret Mary McVeigh, P.J.Ch.
Passaic County Courthouse
71 Hamilton St., Chambers 100
Paterson, NJ 07505

A copy of the objection to the Order to Show cause must also be served upon the attorney for the Plaintiff at:

Brian C. Nicholas, Esq.
Zucker, Goldberg & Ackerman, L.L.C.
200 Sheffield Ave, Suite 101

Mountainside, N.J. 07092

Objections to this Order to Show Cause must state with specificity the basis for the objection and must be filed no later than _____, 2012.

7. If a timely objection is not filed, the matter may proceed to judgment in accordance with the Rules of Court.

8. Any objection in regard to a specific corrected NOI in a specific foreclosure case must be filed in writing **under the docket number of the individual foreclosure action, NOT this Order to Show Cause.** Any objection must state the basis for the objection with specificity and be filed and served as set forth in Paragraph 6 above. Objections to a specific NOI will be referred to the Chancery Judge in the vicinage in which the property lies for resolution.

9. Parties in interest are hereby advised that a telephone call to the Plaintiff, to the Plaintiff's attorney, to the Superior Court Clerk's Office, or to the Court, will not protect your rights; you must file and serve your written objection as outlined in this Order

10. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. If you do not have an attorney or are not eligible for free legal assistance through the Legal Services office (or such office does not provide services for this particular type

of proceeding), you may obtain a referral to an attorney by calling one of the Lawyer Referral Services.

11. If no party in interest timely files and serves an objection to this Order to Show Cause as provided for above, the application may be decided by the Court on the date this matter is scheduled to be heard, provided that the Plaintiff has filed a proof of service and a proposed form of judgment as required by this Order to Show Cause.

12. If written objection to this Order to Show Cause is filed, the Plaintiff's written reply shall be filed and served by _____, 2012. A copy of the reply, if any, shall be served upon the Clerk of Superior Court, with a courtesy copy directly to the Honorable Margaret Mary McVeigh, P.J.Ch. Plaintiff is only required to serve its response upon any party or parties who have filed written objections to this Order to Show Cause.

13. Plaintiff shall submit to the Court an original and two copies of a proposed form of judgment addressing the relief sought on the date this matter is scheduled to be heard no later than _____ days before the date this matter is scheduled to be heard.

14. The Plaintiff shall file proof of service of the Amended Verified Complaint, this Order to Show Cause and all supporting documents with the Clerk of Superior Court no

later than nine (9) days before the return date of this matter.

15. The court will entertain argument, but not testimony, on the return date of the order to show cause, unless the court advised to the contrary no later than _____ days before the return date.

Hon. Margaret Mary McVeigh, P.J.Ch.

LEONARD B. ZUCKER
MICHAEL S. ACKERMAN
JOEL ACKERMAN*

FRANCES GAMBARDELLA
BRIAN C. NICHOLAS ♦♦
STEVEN D. KROL
CHRISTOPHER G. FORD
DENISE CARLON ♦
CHRISTINE E. POTTER
RYAN S. MALC
ASHLEIGH LEVY MARIN £
DOUGLAS J. McDONOUGH
TIMOTHY J. ZIEGLER
STEPHANIE WOLCHOK
ELIZABETH P. RIZZO
ROBERT D. BAILEY
JAIME R. ACKERMAN ♦
RACHEL G. PACKER ‡
KACIE W. BROWN

* ALSO MEMBER OF NY, PA AND CA BAR
♦ ALSO MEMBER OF NY, PA AND ME BAR
♦♦ ALSO MEMBER OF NY AND ME BAR
♦ ALSO MEMBER OF NY BAR
£ ALSO MEMBER OF PA BAR
‡ ALSO MEMBER OF NY AND DC BAR

ZUCKER, GOLDBERG & ACKERMAN, LLC
ATTORNEYS AT LAW

200 SHEFFIELD STREET- SUITE 101
P.O. BOX 1024
MOUNTAINSIDE, NJ 07092-0024

TELEPHONE: 908-233-8500
FACSIMILE: 908-233-1390
E-MAIL: bnicholas@zuckergoldberg.com

For payoff/reinstatement figures
Please send your request to: zuckergoldberg.com/fax

REPLY TO NEW JERSEY ADDRESS

FOUNDED IN 1923
AS ZUCKER & GOLDBERG

MAURICE J. ZUCKER (1918-1979)
LOUIS D. GOLDBERG (1923-1967)
LEONARD H. GOLDBERG (1929-1979)
BENJAMIN WEISS (1949-1981)

Pennsylvania Office:
P.O. Box 650
Hershey, PA 17033

OF COUNSEL:

SCOTT A. DIETTERICK, ESQ. ‡
KIMBERLY A. BONNER, ESQ. ‡
RALPH M. SALVIA, ESQ. ‡

‡ *MEMBER OF PA BAR ONLY*

July 16, 2012

(VIA JEFIS and Lawyers Service)
Honorable Margaret McVeigh,P.J.Ch.
Passaic County Superior Court
71 Hamilton Street, Chambers 100
Paterson, N.J. 07505

RE: In re Notices of Intention to Foreclose
Served by MidFirst Bank

Docket No.: F-12399-12

Dear Judge McVeigh,

Our firm represents MidFirst Bank in the above captioned matter. Enclosed for filing please find the original and two copies of the following documents:

1. Order to Show Cause

2. Amended Verified Complaint
3. Amended Certification of Thad Burr
4. Amended Certification of Brian C. Nicholas, Esq.
5. Certification of Service

Respectfully submitted,

Brian C. Nicholas, Esq.

ZUCKER, GOLDBERG & ACKERMAN, LLC
200 Sheffield Street, Suite 101
P.O. Box 1024
Mountainside, New Jersey 07092-0024
(908) 233-8500
Attorneys for Plaintiffs

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY MIDFIRST BANK

SUPERIOR COURT OF NEW JERSEY

CHANCERY DIVISION

Civil Action

Docket No: F-12399-12

AMENDED CERTIFICATION OF BRIAN C. NICHOLAS, ESQ.

BRIAN C. NICHOLAS, ESQ., of full age, hereby certifies as follows:

1. I am an attorney licensed to practice in the State of New Jersey and an associate with the law firm of Zucker, Goldberg & Ackerman, L.L.C. I am the attorney responsible for this matter and in this capacity I am familiar with the facts of Plaintiff's Order to Show Cause and Verified Complaint. I make this certification in support of Plaintiff's application for an Order to Show Cause.

2. The Amended Certification of Thad Burr and the Verification of the Amended Verified Complaint by Thad Burr contain a facsimile of the original signature of Mr. Burr. The signature is genuine and the original signature can be provided should the Court so request.

3. In addition to serving the Order to Show Cause by certified mail return receipt requested and regular mail to the property address subject to the foreclosure and, if different, the borrower's last known address in MidFirst's system of record, Plaintiff proposes providing notice of this action by publication.

4. Attached as Exhibit "E" is a copy of the notice plaintiff proposes be utilized for publication in the following newspapers:

a. Star Ledger
b. Bergen Record
c. The Press of Atlantic County
d. The Gloucester County Times

5. Attached as Exhibit "F" is a copy of the Cover Letter that was promulgated by the Conference of General Equity Judges to be served with the new NOI.

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

BRIAN C. NICHOLAS, ESQ.

DATED: July 16, 2012

Exhibit “E”

NOTICE

Docket No. :
Superior Court of New Jersey
Chancery Division

STATE OF NEW JERSEY TO:

Any defendant in an uncontested residential mortgage foreclosure action in which MidFirst Bank is the Plaintiff

YOU ARE HEREBY ORDERED TO SHOW CAUSE why the relief requested by MidFirst Bank in the Verified Complaint and Order to Show Cause in a civil action pending in the Superior Court of New Jersey, Chancery Division, bearing Docket <INSERT DOCKET NO> should not be granted by the Court. Copies of all of the pleadings in regard to this matter may be obtained from the Court's web page at http://www.judiciary.state.nj.us.

This action has been instituted for the purpose of whether or not the Court should allow MidFirst Bank to re-send Notice of Intentions to Foreclosure pursuant to the process established by the Supreme Court of New Jersey on April 4, 2012. Any opposition to this action must be **in writing** and filed with the Clerk of the Superior Court, Hughes Justice Complex - CN 971, Trenton, New Jersey 08625. A copy of any opposition must also be sent to <INSERT EITHER Honorable Margaret Mary McVeigh, P.J.Ch., Passaic County Courthouse, 71 Hamilton St., Chambers 100, Paterson, NJ 07505 OR Honorable Paul Innes, P.J.Ch., Mercer County Civil Courthouse, 175 South Broad Street, Trenton, NJ 08650> and Brian C. Nicholas, Esq., Zucker, Goldberg & Ackerman, L.L.C., 200 Sheffield Street, Suite 101, Mountainside, NJ 07092. Any opposition must be filed no later than <INSERT DATE>. If timely opposition is filed, the Court may conduct oral argument on <INSERT DATE>. If no timely opposition is filed, the Court may rule on the application on the papers on the return date.

If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association by calling **732-249-5000**. You may also contact the Lawyer Referral Service of the County of venue by calling **973-267-5882**. If you cannot afford an attorney, you may communicate with the Legal Services office of the County of venue by calling **973-383-7400**.

Jennifer M. Perez
JENNIFER M. PEREZ, CLERK
SUPERIOR COURT OF NEW JERSEY

This is an attempt to collect a debt, and any information obtained will be used for that purpose.

"The Fair Housing Act prohibits "any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status, or national origin, or intention to make such preference, limitation or discrimination" in connection with any aspect of a residential real estate transaction. Zucker, Goldberg and Ackerman, LLC, encourages and supports the equal housing practices of the Fair Housing Act in the conduct of its business."

Exhibit “F”

LEONARD B. ZUCKER
MICHAEL S. ACKERMAN
JOEL ACKERMAN*

FRANCES GAMBARDELLA
BRIAN C. NICHOLAS ♦♦
STEVEN D. KROL
CHRISTOPHER G. FORD
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ZUCKER, GOLDBERG & ACKERMAN, LLC
ATTORNEYS AT LAW

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TELEPHONE: 908-233-8500
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E-MAIL: bnicholas@zuckergoldberg.com

For payoff/reinstatement figures
Please send your request to: zuckergoldberg.com/pr

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Pennsylvania Office:
P.O. Box 650
Hershey, PA 17033

OF COUNSEL:

SCOTT A. DIETTERICK, ESQ. ‡
KIMBERLY A. BONNER, ESQ. ‡
RALPH M. SALVIA, ESQ ‡

‡ *MEMBER OF PA BAR ONLY*

[Date]

[Defendant Name(s)]
[Defendant Address]
[Defendant City, State ZIP]

Re: Order to Show Cause – In re Notices of Intention to Foreclose Served by MidFirst Bank
Docket No.: F-12399-12

Your Foreclosure Action – *[Caption and Docket Number of Defendant's Foreclosure Action]*

Dear [Defendant Name(s)]:

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 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 [*month*] [*day*], 2012, and in compliance with the Supreme Court's opinion in *U.S. Bank N.A. v. Guillaume*, Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, gave permission to MidFirst Bank 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 in which MidFirst Bank is the plaintiff and/or servicer.

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 (without exhibits). Exhibit <INSERT LETTER> to the verified complaint, which lists the foreclosure actions in which [*plaintiff name*] is the plaintiff that pertain to Count [____] of the verified complaint, identifies the foreclosure action in which you are a defendant. Copies of these documents will be made available on the New Jersey Courts web site at http://www.judiciary.state.nj.us/.

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 MidFirst Bank at 800-552-3000. 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 the plaintiff's attorney, Brian C. Nicholas, Esq. at 200 Sheffield Street, Suite 101, Mountainside, N.J. 07902, and mail a copy of the objection to Judge McVeigh at Passaic County Courthouse, 71 Hamilton Street, Chambers 100, Paterson, N.J. 07505.

Your personal appearance at the Superior Court Clerk's Office or your local courthouse will not qualify as an objection. A telephone call will not protect your rights; you must file your objection and serve it on the plaintiff's attorney if you want the court to hear your objection to the relief the plaintiff is seeking. If you file a specific written 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 your objection.

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.

Very truly yours,

Zucker, Goldberg & Ackerman, L.L.C.

ZUCKER, GOLDBERG & ACKERMAN, LLC
200 Sheffield Street, Suite 101
P.O. Box 1024
Mountainside, New Jersey 07092-0024
(908) 233-8500
Attorneys for Plaintiffs

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY MIDFIRST BANK	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION Civil Action Docket No: F-12399-12 **AMENDED CERTIFICATION OF THAD BURR**

THAD BURR, of full age, hereby certifies as follows:

1. I am a First Vice President of MidFirst Bank (hereinafter "MidFirst"). In this capacity, I am the person responsible for managing the overall operations of the Foreclosure Department. As such, I have the authority to make this Certification on behalf of MidFirst. I am the officer in the best position to provide this Certification and explain MidFirst's policies and procedures as they relate to foreclosures and Notices of Intention to Foreclose. I am fully familiar with the facts set forth in this Certification and make this Certification in support of MidFirst's Verified Complaint and Order to Show Cause pursuant to the Supreme Court's April 4, 2012 Order in furtherance of the Guillaume decision.

2. I have managed the overall operations of the Foreclosure Department for over twelve (12) years. Prior to assuming my current position, I worked as a manager in the

foreclosure department for three years. I have over fifteen (15) years of experience with our company. Given my experience in the Foreclosure Department, I have extensive knowledge of the policies, procedures and processes that MidFirst follows as a loan becomes delinquent, referred to foreclosure, and ultimately liquidated. As such, I submit this Certification based upon personal knowledge as well as knowledge gained through a personal review of the business records where necessary.

3. MidFirst is a federally chartered savings association headquartered in Oklahoma City, Oklahoma that services residential mortgage loans, primarily loans insured by the Department of Housing and Urban Development (HUD), throughout the country, including in the state of New Jersey.

4. Prior to July 15, 2011, MidFirst serviced loans through a wholly owned operating subsidiary of MidFirst called Midland Mortgage Co.

5. Once a loan goes into default, multiple attempts are made to contact the borrower to see if any arrangement short of foreclosure can be reached, including a repayment plan, loan modification, forbearance agreement, deed in lieu of foreclosure or short sale. If the borrower opts not to communicate with us or does not otherwise resolve the default through reinstatement or one of the aforementioned plans, MidFirst sends out a Notice of Intention to Foreclose (hereinafter "NOI") as required by the Fair Foreclosure Act, which includes identification of MidFirst

Bank, or other entity as applicable, as the lender and providing its address. The NOI gives the borrower at least thirty days to cure the default. If the default is not cured, or the other arrangements made to resolve the delinquency, the loan is referred to local foreclosure counsel to initiate the foreclosure after the NOI expires.

6. In light of the New Jersey Supreme Court's opinion in U.S. Bank National Association v. Guillaume, 209 N.J. 449 (2012), MidFirst revised its form NOI to ensure it strictly complies with the Fair Foreclosure Act.

7. Attached as Exhibit "1" is a true and accurate copy of the form Notice of Intention to Foreclose that MidFirst intends to utilize.

8. A new NOI has already been mailed by regular and certified mail to all borrowers in default.[1] More than thirty days have elapsed since the NOIs were mailed but the borrowers on the exhibits to the Amended Verified Complaint have failed to reinstate their loans.

[1] This includes the loans where Mortgage Electronic Registration Systems, Inc., GMAC Mortgage, L.L.C. and American Home Mortgage Servicing are the plaintiff.

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

Thad Burr

THAD BURR

DATED: 7-16-12

Exhibit “1”

Midland Mortgage *A Division of MidFirst Bank*

P.O. Box 268806 • Oklahoma City, OK 73126
Tel: 800.552.3000 • Fax: 405.767.5815 • MyMidlandMortgage.com

4/15/2012

REV 6.64
John Smith
1234 Main St
Unit 23
Anytown OK 73111

WRITTEN NOTICE OF INTENT TO FORECLOSE
(NJ STAT ANN SEC. 2A:50-56)

Dear John Smith:

Please read the following important information concerning your mortgage loan that is serviced by Midland Mortgage, a Division of MidFirst Bank (Midland Mortgage). The name and address of the lender is MidFirst Bank, 999 NW Grand Blvd., Oklahoma City, OK 73118.

1. This notice concerns your obligation under a Note and Mortgage/Deed of Trust on property address 45778 Deercreek Rd, Unit B, Anytown OK 73114 (Loan Number 7013).

2. You are presently **in default** due to the failure to make required monthly mortgage payments owed under your Note and Mortgage/Deed of Trust.

3. You have the right to cure the default and avoid foreclosure as provided in section 5, NJ Stat. Ann. Sec. 2A:50-57.

4. The Total Sum of Money Due to cure the default as of the date of this letter is $84589, which includes the following:

Missed monthly mortgage payments (including interest) from 1/1/2009 through 6/1/2012:	$84589
Total Sum of Money Due as of the date of this letter:	$84589

   Please note that payment of the Total Sum of Money Due to cure the default does not affect your continuing obligation to make future monthly mortgage payments that become due after the date of this letter.

5. You must cure the default by **5/15/2012** by tendering the Total Sum Due payable to Midland Mortgage and delivering that payment to Midland Mortgage, c/o Danny Sullivan or New Jersey Payment Processor, P.O. Box 268888, Oklahoma City, OK 73126-8888, 1-800-552-3000.

6. If the default is not cured by **5/15/2012,** the lender may take steps to terminate your ownership in the property by commencing or continuing a foreclosure suit in a court of competent jurisdiction.

*If you have received a bankruptcy discharge of the debt secured by the Mortgage/Deed of Trust or you are currently in bankruptcy under the protection of the automatic stay, this letter is not an attempt to collect the debt, but any default will need to be cured to avoid foreclosure. If your loan was in default at the time MidFirst Bank acquired the servicing of your loan and you have not filed bankruptcy or received a discharge of the debt secured by the Mortgage/Deed of Trust, we are required to advise you that this communication is from a debt collector, this is an attempt to collect a debt, and any information obtained will be used for that purpose.

Midland Mortgage *A Division of MidFirst Bank*
P.O. Box 268806 • Oklahoma City, OK 73126
Tel: 800.552.3000 • Fax: 405.767.5815 • MyMidlandMortgage.com

7. If the lender takes steps to terminate your ownership interest in the property by commencing or continuing a foreclosure suit in a court of competent jurisdiction, you shall still have the right to cure your default pursuant to section 5, NJ Stat. Ann. Sec. 2A:50-57, but you shall be responsible for the lender's court costs and attorney fees in an amount not to exceed that amount permitted pursuant to the Rules Governing the Courts of the State of New Jersey.

8. You may have the right to transfer the real estate to another person subject to the security interest and that transferee may have the right to cure the default as provided herein, subject to the mortgage documents.

9. You are advised to seek counsel from an attorney of your own choosing concerning your residential mortgage default situation. If you are unable to obtain an attorney, you may communicate with the New Jersey Bar Association or Lawyer Referral Service in the county in which the residential property securing the mortgage loan is located. If you are unable to afford an attorney, you may communicate with the Legal Services Office in the county in which the property is located.

10. Financial assistance for curing your default may be available 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 those organizations identified on the Commissioner of Banking and Insurance website is enclosed.

11. The name and address of the lender is: MidFirst Bank, 999 NW Grand Blvd., Oklahoma City, OK 73118. You may contact Twila Ballard or any other loan counselor at Midland Mortgage, representative of lender, toll free at 1-800-552-3000, if you disagree with the lender's assertion that a default has occurred or the correctness of the Lender's calculation of the amount required to cure the default.

Please be advised that you have the opportunity to receive home ownership counseling regarding the retention of your home from various local agencies approved by the Department of Housing and Urban Development (HUD). For a list of the agencies nearest you, contact HUD at their toll-free number 1-800-569-4287.

Please contact our Delinquency Assistance Center toll free at 1-800-552-3000, Monday through Friday, 8:00 a.m. to 9:00 p.m. (Central Time) to discuss how we can assist you in resolving your default and saving your home.

Sincerely,

Delinquency Assistance Center
Midland Mortgage, a Division of MidFirst Bank

Enclosure

*If you have received a bankruptcy discharge of the debt secured by the Mortgage/Deed of Trust or you are currently in bankruptcy under the protection of the automatic stay, this letter is not an attempt to collect the debt, but any default will need to be cured to avoid foreclosure. If your loan was in default at the time MidFirst Bank acquired the servicing of your loan and you have not filed bankruptcy or received a discharge of the debt secured by the Mortgage/Deed of Trust, we are required to advise you that this communication is from a debt collector, this is an attempt to collect a debt, and any information obtained will be used for that purpose.

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.

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

http://www.state.nj.us/dobi/division_consumers/finance/counselors.html#counsel

ZUCKER, GOLDBERG & ACKERMAN, LLC
200 Sheffield Street, Suite 101
P.O. Box 1024
Mountainside, New Jersey 07092-0024
(908) 233-8500
Attorneys for Plaintiffs

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY MIDFIRST BANK	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION Civil Action Docket No: F-12399-12 **AMENDED VERIFIED COMPLAINT**

Plaintiff MidFirst Bank, through their attorneys, Zucker, Goldberg & Ackerman, LLC, by way of Verified Complaint, hereby say as follows:

FACTS:

1. MidFirst Bank (hereinafter "MidFirst") is a federally chartered savings association headquartered in Oklahoma City, Oklahoma.

2. MidFirst services residential mortgage loans throughout the country, including loans in the State of New Jersey.[1]

3. When a loan is delinquent, foreclosure is always the last resort. Multiple attempts are made to contact the borrower to see if any arrangement short of foreclosure can be reached, including a repayment plan, loan modification, forbearance agreement, deed in lieu of foreclosure or short sale. If the borrower opts not to communicate with MidFirst or does not otherwise resolve the default, MidFirst sends out a Notice of Intention to Foreclose (hereinafter "NOI") as required by the Fair Foreclosure Act, giving the borrower at least thirty days to cure the default and reinstate the loan. If the default is not cured or other arrangements made to resolve the default, after the NOI expires, the loan is referred to local foreclosure counsel to initiate foreclosure.

4. On February 27, 2012, the New Jersey Supreme Court issued its opinion in U.S. Bank National Association v. Guillaume, 209 N.J. 449 (2012), requiring strict compliance with the requirements of the Fair Foreclosure Act, including identification of the name and address of the lender rather than the servicer contact information alone.

[1] Prior to July 2011, servicing was done through Midland Mortgage Co., a wholly owned operating subsidiary of MidFirst.

5. MidFirst has completed a revision to its form NOI to add the name and address of the lender in addition to the servicer. In all cases herein, MidFirst Bank is the lender.

6. Attached as Exhibit "1" to the Amended Certification of Thad Burr is a true and accurate copy of the revised form NOI that MidFirst intends to utilize and should the Court so order, the form that Plaintiff would re-send to all borrowers affected by the outcome of this Order to Show Cause.

7. A new NOI has already been mailed by regular and certified mail by Plaintiff to all borrowers in default. More than thirty days have elapsed since the NOIs were mailed but the borrowers on the attached exhibit have failed to reinstate their loans.

8. Subsequent to the Guillaume opinion, Chief Justice Stuart Rabner issued an Order on April 4, 2012, in furtherance of the Supreme Court's holding in U.S. Bank National Association v. Guillaume, authorizing the Honorable Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage and the Honorable Paul Innes, P.J.Ch., Mercer Vicinage to entertain summary actions by Order to Show Cause as to why plaintiffs in uncontested pre-judgment residential foreclosure matters should not be allowed to re-serve corrected NOIs.

COUNT I: MidFirst Bank

9. Plaintiff hereby incorporates by reference Paragraphs 1 through 8 as if set forth herein.

10. Attached as Exhibit "A" is a list of uncontested residential foreclosure actions where MidFirst Bank is the plaintiff and MidFirst requests relief from this Court to issue an Order to Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, MidFirst Bank respectfully request judgment:

(a) Deeming the form Notice of Intention to Foreclose attached as Exhibit "1" to the Certification of Thad Burr compliant with the requirements of the Fair Foreclosure Act;

(b) Permitting Plaintiff to serve new Notice of Intentions to Foreclose, in the form attached as Exhibit "1" to the Certification of Thad Burr, to defendant mortgagors and/or parties obligated on the underlying debt, for pre-judgment foreclosure actions listed on Exhibit "A" of this Verified Complaint where MidFirst Bank is the plaintiff; and

(c) Any further relief the Court deems equitable and just.

COUNT II: Mortgage Electronic Registration Systems, Inc.

11. Plaintiff hereby incorporates by reference Paragraphs 1 through 10 as if set forth herein.

12. MidFirst Bank is the lender for three (3) loans where the foreclosure action was filed in the name of Mortgage Electronic Registration Systems, Inc. MidFirst is making an

application to the Court to substitute itself as the plaintiff prior to applying for entry of final judgment in these cases.

13. Attached as Exhibit "B" is a list of uncontested residential foreclosure actions including the foreclosures in which Mortgage Electronic Registration Systems, Inc. is the plaintiff.

14. MidFirst respectfully requests this Court issue an Order to Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, MidFirst Bank respectfully request judgment:

(a) Deeming the form Notice of Intention to Foreclose attached as Exhibit "1" to the Certification of Thad Burr compliant with the requirements of the Fair Foreclosure Act;

(b) Permitting Plaintiff to serve new Notice of Intentions to Foreclose, in the form attached as Exhibit "1" to the Certification of Thad Burr, to defendant mortgagors and/or parties obligated on the underlying debt, for pre-judgment foreclosure actions listed on Exhibit "B" of this Verified Complaint where Mortgage Electronic Registration Systems, Inc. is the plaintiff; and

(c) Any further relief the Court deems equitable and just.

COUNT III: GMAC Mortgage, L.L.C.

15. Plaintiff hereby incorporates by reference Paragraphs 1 through 14 as if set forth herein.

16. MidFirst Bank is servicing two (2) loans where the foreclosure action was filed in the name of the prior servicer,

GMAC Mortgage, L.L.C. MidFirst became the lender after the foreclosure was filed and continues to be the lender today.

17. Attached as Exhibit "C" is a list of uncontested residential foreclosure actions including the two foreclosures in which GMAC Mortgage, L.L.C. is the plaintiff.

18. MidFirst respectfully requests this Court issue an Order to Show Cause consistent with the Supreme Court's April 4, 2012 Order.

WHEREFORE, MidFirst Bank respectfully request judgment:

(a) Deeming the form Notice of Intention to Foreclose attached as Exhibit "1" to the Certification of Thad Burr compliant with the requirements of the Fair Foreclosure Act;

(b) Permitting Plaintiff to serve new Notice of Intentions to Foreclose, in the form attached as Exhibit "1" to the Certification of Thad Burr, to defendant mortgagors and/or parties obligated on the underlying debt, for pre-judgment foreclosure actions listed on Exhibit "C" of this Verified Complaint where GMAC Mortgage, L.L.C. is the plaintiff but MidFirst Bank is the servicer; and

(c) Any further relief the Court deems equitable and just.

COUNT IV: American Home Mortgage Servicing

19. Plaintiff hereby incorporates by reference Paragraphs 1 through 18 as if set forth herein.

20. MidFirst Bank is servicing one (1) loan where the foreclosure action was filed in the name of the prior servicer, American Home Mortgage Servicing. MidFirst became the lender

after the foreclosure was filed and continues to be the lender today.

21. Attached as Exhibit "D" is a list of uncontested residential foreclosure actions including the foreclosure in which American Home Mortgage Servicing is the plaintiff.

22. MidFirst respectfully requests this Court issue an Order to Show Cause consistent with the Supreme Court's April 4, 2012 Order.

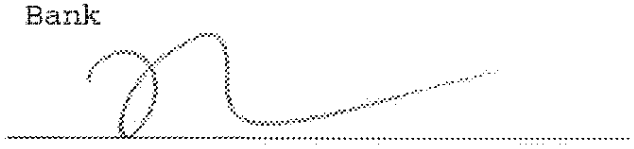
WHEREFORE, MidFirst Bank respectfully request judgment:

(a) Deeming the form Notice of Intention to Foreclose attached as Exhibit "1" to the Certification of Thad Burr compliant with the requirements of the Fair Foreclosure Act;

(b) Permitting Plaintiff to serve new Notice of Intentions to Foreclose, in the form attached as Exhibit "1" to the Certification of Thad Burr, to defendant mortgagors and/or parties obligated on the underlying debt, for pre-judgment foreclosure actions listed on Exhibit "D" of this Verified Complaint where American Home Mortgage Servicing is the plaintiff but MidFirst Bank is the servicer; and

(c) Any further relief the Court deems equitable and just.

Zucker, Goldberg & Ackerman, LLC
Attorneys for Plaintiff MidFirst Bank

By: 

Brian C. Nicholas, Esq.

DATED: July 16, 2012

CERTIFICATION

I certify pursuant to Rule 4:5-1 that, to the best of my knowledge, this matter is not the subject of any other action pending in any court or of a pending arbitration proceeding, nor is any other action or arbitration proceeded contemplated, other than the pending foreclosure actions on Exhibits A, B, C and D to the Amended Verified Complaint, separate actions initiated outside of the uncontested foreclosure proceedings in which Foreclosure Defendants may have raised claims concerning, inter alia, their NOIs but which are not at issue in this application. I further certify that I am unaware of any non-party who should be joined in this action pursuant to Rule 4:28 or who is subject to joinder pursuant to Rule 4:29-1(b) because of potential liability to any party based on the same transactional facts.

Brian C. Nicholas, Esq.

Dated: July 16, 2012

VERIFICATION

I, Thad Burr, of full age certify as follows:

1. I am a First Vice President of MidFirst Bank.

2. I have read the contents of the Amended Verified Complaint and verify the statements contained therein are true to the best of my knowledge and personal information.

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

Thad Burr

THAD BURR

DATED: 7-16-12

Exhibit “A”

EXHIBIT A

Gloucester	F-002827-11	MIDFIRST BANK	Mel D. Duka
Gloucester	F-045495-10	MIDFIRST BANK	Donald C. Gibbs, Jr.
Gloucester	F-001576-11	MIDFIRST BANK	Sandra Cowgill
Gloucester	F-10554-09	Midfirst Bank	James J. Clifford Jr.
Gloucester	F-15925-09	Midfirst Bank	MARY LOUISE WILLIAMS
Gloucester	F-25394-09	Midfirst Bank	HILDRED M ROBINETTE
Gloucester	F-035955-10	MIDFIRST BANK	Judy Ellen Moyer
Gloucester	F-038942-10	MIDFIRST BANK	ANTHONY A. MACK
Gloucester	F-003667-11	Midfirst Bank	Kathleen Clifford
Gloucester	F-16837-09	Midfirst Bank	PAUL D CONVERY
Gloucester	F-26072-09	Midfirst Bank	Timothy S. Hayes
GLOUCESTER	F-489-11	Midfirst Bank	Danny M. Locantora
GLOUCESTER	F-2521-11	Midfirst Bank	Allen Greco
GLOUCESTER	F-6405-12	Midfirst Bank	Alexander Rosario
Hudson	F-002775-11	MIDFIRST BANK	Simone Julien
Hudson	F-003763-11	MIDFIRST BANK	Fawzi Kaldas
Hudson	F-006042-11	MIDFIRST BANK	ALBERTO MOSSO
Hudson	F-003823-11	Midfirst Bank	Juan L. Rivas
Hudson	F-43951-09	MidFirst Bank	Remmill J. Valenzuela
Hudson	F-43466-09	MidFirst Bank	Lisa A. Gourdine/Ronald G. Gourdine
Hunterdon	F-002076-11	Midfirst Bank	ADAN B. MENENDEZ
Mercer	F-20625-10	MIDFIRST BANK	SHAWN R. FOOSE
Mercer	F-33914-08	Midfirst Bank, a Federally Chartered Savings Association	STACI M. HARDY-THORPE
Mercer	F-23455-08	MidFirst Bank	Romy Almonte
Mercer	F-30756-08	Midfirst Bank	Paul M. Mullins
Mercer	F-28026-09	MidFirst Bank	Renee Wagner
Mercer	F-40825-08	Midfirst Bank	Sandra J. Mitchell
Mercer	F-004772-11	MIDFIRST BANK	Frico Augustin
Mercer	F-007337-11	MIDFIRST BANK	JOSE G. MUNOZ
Mercer	F-001036-11	MIDFIRST BANK	Isabel Cruz
Mercer	F-002079-11	Midfirst Bank	Fred C. Anderson
Mercer	F-001568-11	MidFirst Bank	Angelo Sanchez/Doris Martinez
Mercer	F-044648-10	MidFirst Bank	Manuel D. Reyes/Mrs. Manuel D. Reyes
Mercer	F-42838-09	Midfist Bank	Girau

EXHIBIT A

Middlesex	F-25979-10	Midfirst Bank	Judith Isaac, deceased
Middlesex	F-14594-09	MidFirst Bank	LUIS ARANGUREN
Middlesex	F-29912-09	Midfirst Bank	SHEBA DATT
Middlesex	F-17681-10	Midfirst Bank	GLORIA BERRY
Middlesex	F-004335-11	Midfirst Bank	DENIS LEBOUTHILLIER
Middlesex	F-49665-08	Midfirst Bank	ANIBAL MORALES
Middlesex	F-060943-10	MidFirst Bank	Gary Arthur Nebus
Middlesex	F-000897-11	MidFirst Bank	Magdalena Redroban
MIDDLESEX	F-2813-11	Midfirst Bank	Mahmoud El Dekki
Monmouth	F-16897-09	Midfirst Bank	ANTHONY R. SUNNERVILLE
Monmouth	F-15406-10	MIDFIRST BANK	Christopher Langan
Monmouth	F-21097-09	Midfirst Bank	JOHN ZAREMBA
Monmouth	F-41457-09	Midfirst Bank	DAVID SUTTLES
Monmouth	F-001082-11	MIDFIRST BANK	Stanley Davis Jr.
MONMOUTH	F-2815-11	Midfirst Bank	Gary D. Gerns
Morris	F-52950-09	Midfirst Bank	Anthony L. Norris
MORRIS	F-59113-09	Midfirst Bank	Courtney Wohlgemuth
Ocean	F-27463-10	Midfirst Bank	GARY P. LEVIN, JR.
Ocean	F-5006-10	MidFirst Bank	BARBARA DENERO
Ocean	F-060323-10	MIDFIRST BANK	Jennifer Cantrell
Ocean	F-004339-11	Midfirst Bank	RICHARD A. SCHAMBACH
Ocean	F-049939-10	MIDFIRST BANK	Lorraine Bill
Ocean	F-29995-09	Midfirst Bank	Anthony Zadzielski
Ocean	F-035056-10	Midfirst Bank	VITO J. GELOSI
Ocean	F-003764-11	MidFirst Bank	Robert McElroy
Ocean	F-003765-11	MIDFIRST BANK	Scott P. Collins
Ocean	F-002806-11	Midfirst Bank	Nelson Calderon
Ocean	F-25190-08	Midfirst Bank	Cheryl V. O'Connor
Ocean	F-001062-11	MidFirst Bank	Christopher Snowden/Gail Snowden
Ocean	F-052733-10	MidFirst Bank	Arthur Belfiore/Maura Belfiore
Ocean	F-17192-10	MidFirst Bank	Justin Byrnes/Liubinca Draghici/Stefanie Leahy
Ocean	F-28015-10	Midfirst Bank	Dameon Prescott
Passaic	F-18947-07	Midfirst Bank	ALVIN J TELLER
Passaic	F-9297-99	MidFirst Bank	PEDRO MEDINA, deceased
Passaic	F-39208-09	Midfirst Bank	LYNETTE QUINONES

EXHIBIT A

Passaic	F-18681-10	Midfirst Bank	BARBARA SPENCER
Passaic	F-27091-09	Midfirst Bank	NATASHA SHANTELLA BAILEY, INDIVIDUALLY AND AS EXECUTRIX OF THE E
Passaic	F-001034-11	MIDFIRST BANK	SENIOR E. JOHNSON
Passaic	F-16636-09	Midfirst Bank	IVORY DAVIS
Salem	F-33455-08	Midfirst Bank	Anthony Solano
Salem	F-005950-11	MIDFIRST BANK	William Vanderslice
Somerset	F-62750-09	Midfirst Bank	VIVIANA PEREZ
Somerset	F-038324-10	Midfirst Bank	Eugene Romeo
Somerset	F-003845-11	MIDFIRST BANK	Janice A. Parris
Somerset	F-15319-10	Midfirst Bank	Jeffrey Cecchine
Sussex	F-55566-09	Midfirst Bank	SAMIR GIRGIS GHOBRIAL
Sussex	F-039897-10	MIDFIRST BANK	TERRENCE MARTONE
Sussex	F-003830-11	MIDFIRST BANK	Angie Heath
Sussex	F-004596-11	Midfirst Bank	Wayne H. Waldron
Union	F-037197-10	MIDFIRST BANK	Francisco L. Rocha
Union	F-40250-08	Midfirst Bank	MARIE ETIENNE
Union	F-20797-09	Midfirst Bank	ARTURO CABRERA
Union	F-62452-09	Midfirst Bank	Elvis A. Revan
Union	F-47767-09	Midfirst Bank	ORLANDO DELA ROSA
Union	F-15366-10	Midfirst Bank	ROSA SANTIAGO
Union	F-36498-08	MidFirst Bank	OSCAR RIVERA
Union	F-64133-09	Midfirst Bank	FRANKLIN CRUZ
Union	F-10957-09	Midfirst Bank	Thomasene McKoy
Warren	F-54441-09	Midfirst Bank	Mary Diehl, Individually and as Administratrix to the Estate of
Warren	F-36996-09	Midfirst Bank	THOMAS MARQUART
Warren	F-2040-11	Midfirst Bank	Richard A. Kern

Exhibit “B”

EXHIBIT B

Vicinage	Docket Number	Plaintiff	Defendant Name
Atlantic	F-11795-05	Mortgage Electronic Registration Systems Inc.	DEBORAH A. ROBINSON
Camden	F-6556-04	Mortgage Electronic Registration Systems Inc.	Amy L. Williams
Morris	F-16033-03	MERS	Albeiro Escobar/Alix Escobar

Exhibit “C”

EXHIBIT C

Vicinage	Docket Number	Plaintiff	Defendant Name
Camden	F-31839-08	GMAC Mortgage, LLC	Leonard B. Bandoch, Jr.
Union	F-45523-08	GMAC Mortgage, LLC	Genevieve Y. Cox

Exhibit “D”

EXHIBIT D

Vicinage	Docket Number	Plaintiff	Defendant Name
Gloucester	F-848-07	American Home Mortgage Servicing	Patrick Stanish

ZUCKER, GOLDBERG & ACKERMAN, LLC
200 Sheffield Street, Suite 101
P.O. Box 1024
Mountainside, New Jersey 07092-0024
(908) 233-8500
Attorneys for Plaintiffs

IN RE NOTICES OF INTENTION TO FORECLOSE SERVED BY MIDFIRST BANK	SUPERIOR COURT OF NEW JERSEY PASSAIC COUNTY CHANCERY DIVISION Civil Action Docket No: **CERTIFICATION OF SERVICE**

I, Brian C. Nicholas, Esq., hereby certify as follows:

1. I am an associate with the law firm of Zucker, Goldberg & Ackerman, L.L.C. I am the attorney responsible for the above captioned matter.

2. On July 16, 2012, our firm caused to be served the within Order to Show Cause, Amended Verified Complaint, Amended Certification of Thad Burr and Amended Certification of Brian C. Nicholas, Esq. to the following persons:

   a. VIA Lawyers Service & JEFIS
      Honorable Margaret McVeigh, P.J.Ch.
      Passaic County Superior Court
      Hamilton Street, Chambers 100
      Paterson, N.J. 07505

   b. VIA JEFIS
      Jennifer Perez,
      Clerk of Superior Court
      Superior Court of New Jersey
      ATTN: Ryan Gerbino

West Market Street
6th Floor North Wing
Trenton, N.J. 08625

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

Brian C. Nicholas, Esq.

Dated: July 12, 2012