

POWERS KIRN, LLC
 728 Marne Highway, Suite 200
 Moorestown, NJ 08057
 (856) 802-1000
 Attorneys for Plaintiff, Aurora Financial Group, Inc.

IN RE APPLICATION BY AURORA FINANCIAL GROUP, INC., TO ISSUE CORRECTED NOTICES OF INTENT TO FORECLOSE ON BEHALF OF IDENTIFIED FORECLOSURE PLAINTIFFS IN UNCONTESTED CASES	: SUPERIOR COURT OF NEW JERSEY : CHANCERY DIVISION : : COUNTY : : DOCKET NO.: F- : : CIVIL ACTION : : ORDER TO SHOW CAUSE : TO PROCEED SUMMARILY : PURSUANT TO R. 4:67-2
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THIS MATTER being opened to the court by Powers Kim, LLC, Attorneys for Plaintiff, Aurora Financial Group, Inc., seeking relief by way of Order to Show Cause pursuant to the Supreme Court's Order dated April 4, 2012 Order and based upon the facts set forth in the 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 borrowers/defendants listed in Exhibits 1, 2, 3 & 4 of the Verified Complaint appear and show cause on the _____ day of _____, 2012 before the Honorable Paul Innes, P.J.Ch., Superior Court of New Jersey, Mercer

County, Chancery Division, at 175 S. Broad Street, Trenton, New Jersey 08650 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 Aurora 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 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, principal residence. Service shall be effectuated by certified mail, return receipt requested, simultaneously with regular mail, addressed to the property address and the last known address (if different) in Plaintiffs' records.
2. A copy of this Order to Show Cause and 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, Verified Complaint (without exhibit, and Certification of Richard Favretto (without exhibits), shall be served upon borrowers listed in Exhibits 1, 2, 3 and 4 to the Verified Complaint, by certified mail, return receipt requested (or by registered mail, with respect to any borrower listed in Exhibits 1, 2, 3 and 4 to the Verified Complaint who resides outside the

United States) simultaneously with regular mail. All other interested parties shall be served by publication as outlined in this Order.

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 5 of the Certification of Richard Favretto. Plaintiff shall also serve a Cover Letter in the form set forth in Exhibit 6 of the Certification of Richard Favretto.
 - 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 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 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 the corrective 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 7 to the Certification of Richard Favretto on at least two days prior to _____

in the following newspapers:

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

6. The Court will only entertain objections to the process outlined in the Supreme Court's April 4, 2012 Order. Any party 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 Paul Innes, P.J.Ch.

Civil Courthouse
175 S. Broad Street
Trenton, NJ 08650

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

Edward W. Kim, III, Esquire
Powers Kim, L.L.C.
728 Marne Highway, Suite 200
Moorestown, NJ 08057

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. In the event 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. In the event no party in interest files and serves a timely objection to this Order to Show Cause, as provided for above, then 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. In the event a written objection to this order to Show Cause is filed, Plaintiff's written reply brief 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 Paul Innes, 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 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.

Honorable Paul Innes, P.J.Ch.

POWERS KIRN
COUNSELORS AT LAW

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AUG 20 2012

**SUPERIOR COURT
CLERK'S OFFICE**

POWERS KIRN, LLC
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Suite 200
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Tel: 856.802.1000
Fax: 856.802.4300
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August 14, 2012

Honorable Paul Innes, P.J.Ch.
Superior Court of New Jersey
Chancery Division, Civil Courthouse
175 S. Broad Street, P.O. Box 8068
Trenton, New Jersey 08650-0068

William M.E. Powers, Jr
William M.E. Powers, III
Sarah E. Powers
Edward W. Kim, III
Jeanette J. O'Donnell
Frances M. Kelly
Angela C. Pattison
Christopher M. Howard
Megan E. Shafranski

Re: Application of Aurora Financial Group, Inc. To Issue Corrected Notices of Intent to Foreclose on Behalf of Identified Foreclosure Plaintiff's in Uncontested Cases.
Docket No. F-

Dear Judge Innes:

Please accept this letter brief in lieu of a more formal brief in support of Aurora Financial Group's Order to Show Cause to Issue Corrected Notices of Intent to Foreclose on behalf of identified foreclosure Plaintiffs in uncontested cases.

Our firm represents Aurora Financial Group, Inc. (hereinafter, "Aurora"). Aurora is a licensed mortgage banker and mortgage servicer operating in the States of New Jersey and Pennsylvania. Aurora maintains a portfolio of approximately 10,500 loans consisting of loans which were originated and held by Aurora, as well as loans owned by New Jersey Housing and Mortgage Finance Agency, Police and Firemen's Retirement System Board of Trustees by its Administrative Agent, New Jersey Housing and Mortgage Finance Agency, and Roma Bank, for which Aurora serves as the servicing agent.

Aurora utilizes a fully automated software system entitled Financial Industry Computer Systems, (hereinafter, "FICS"). FICS is a "real-time" computerized system used in maintaining loan level servicing functions for escrow administration, collections, investor reporting, payments processing and year end reporting. FICS is a "real-time" system, meaning that all payments made to a particular loan are reflected in Aurora's system as soon as the payment is received. Aurora's business records are all made at or near the time of the occurrence of the event recorded, such as a payment being made or an escrow advance being disbursed, and are made by individuals with personal knowledge of the information being placed in the business record or from information transmitted by individuals with personal knowledge. The records are kept in the course of Aurora's regularly conducted business activities and it is the regular practice of Aurora to make and rely upon such business records. As a result, the foreclosing plaintiff is not likely to have possession or knowledge of the relevant servicing information in cases for which Aurora is servicing the mortgage loan.

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As servicing agent, when a residential mortgage loan falls into default, Aurora is responsible for preparing and serving the Notice of Intent to Foreclose, or "NOI", as required by New Jersey's Fair Foreclosure Act, N.J.S.A. 2A:50-56.

Recently, the New Jersey Supreme Court addressed the issue of whether the Fair Foreclosure Act requires strict compliance with the NOI requirement. Specifically, in U.S. Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), the Court held that the Fair Foreclosure Act does require that a lender strictly comply with the notice requirements set forth in N.J.S.A. 2A:50-56. The Court further held the NOI must contain the identity of the lender and provide the lender's address. The Court in Guillaume also overturned the Appellate Division's decision in Bank of N. Y. v. Laks, 422 N.J. Super. 201 (App.Div.2011) which held that when the failure to identify the lender in the NOI is raised prior to entry of final judgment, the only remedy available to the trial court is to dismiss the foreclosure action. In overruling Laks, the Supreme Court held that the Chancery court adjudicating the foreclosure action is imbued with the discretion to fashion an equitable remedy to address the issue, which may include allowing the lender to cure the deficient NOI or dismissing the case.

In furtherance of the Court's ruling in Guillaume, on April 4, 2012, the Court entered an Order authorizing the Court to entertain Orders to Show Cause, to be filed by lenders and their servicing agents, which seek to allow the lenders to cure deficient NOIs previously served in pending, pre-judgment, uncontested foreclosure actions which were filed prior to February 27, 2012.

Aurora has identified a small pool of foreclosure cases filed prior to February 27, 2012, in which it served NOIs that failed to properly identify the lender and/or provide the lender's address as required by N.J.S.A. 2A:50-56. As a result, Aurora seeks an Order to Show Cause pursuant to the procedure outlined in the Court's April 4, 2012 Order, permitting it to serve corrective NOIs which will properly identify the lender and provide the lender's address. This will permit Aurora to proceed with these uncontested cases and enable its counsel to complete the required Certification of Diligent Inquiry in each case.

Aurora has attached hereto, as Exhibit 1, a list of 51 uncontested, pre-judgment foreclosure actions in which the NOI failed to properly identify the lender or provide the lender's address. The exhibit also contains the name of the defendant, the name of the Plaintiff/lender which will be identified in the corrected NOI, the docket number and the address where the corrected NOI will be mailed.

Aurora has also attached hereto, as Exhibit 2, a list of 7 files where the initial NOI contained a cure date that was less than 30 days from the date the letter was forwarded to the borrower. While the borrowers in each of these 7 cases were afforded a full 30 days to reinstate prior to the commencement of the foreclosure, Aurora nonetheless seeks the Court's permission to

Honorable Paul Innes, P.J.Ch.
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Page Three

forward corrected NOIs in these cases.

Aurora has also attached, as Exhibit 3, a list of 2 cases in which the initial NOI notice failed to provide the borrower with a telephone number to contact the loan servicer in the event they had questions regarding the notice. While the initial NOI was forwarded on the servicing agent's letterhead, which contained the servicing agent's telephone number, the paragraph which advised the borrower that they could call the servicing agent in the event that they had any questions, failed to contain the servicing agent's telephone number. Aurora seeks the Court's permission to serve corrected NOIs in these two cases, which contain the servicing agent's telephone number.

Finally, Aurora has attached, as Exhibit 4, a list of 18 cases, for which the initial NOI sent to the borrower is perceived to be deficient, but the borrowers are currently under the protection of a bankruptcy petition. In 17 of the listed cases, the NOI failed to properly identify the lender and provide the lender's address. In the remaining case, the NOI provided a cure date which was only 29 days from the date that the NOI was sent. Aurora seeks an Order from the Court granting it permission to serve corrected NOIs in each of these cases when the bankruptcy case is dismissed or when relief from the automatic stay is obtained.

In further support of its application, Aurora attaches as Exhibit 5 to the Verified Complaint, a proposed form of corrected NOI which it proposes to send to each defendant identified in Exhibits 1, 2, 3 & 4. Each corrective NOI sent will be specific to each defendant and will contain the specific information unique to that particular defendant's case, which will provide the borrower with the information necessary to reinstate their loan. The corrective NOI which Aurora proposes to send will exclude all attorney's fees and costs which have been incurred in connection with the foreclosure action.

Aurora asserts that allowing it to cure the deficient NOIs as requested, by serving corrected NOIs upon each defendant, which exclude attorney's fees and costs, is the appropriate equitable remedy in each of these cases.

In Guillaume, the Supreme Court held that when considering a case involving a deficient NOI, and in determining the appropriate remedy, the Chancery Court should take into consideration the express purpose of the NOI provision of the FFA, "to provide notice that makes "the debtor aware of the situation" and to enable the homeowner to attempt to cure the default." 209 N.J. at 479. In fashioning the appropriate equitable remedy, the Chancery Court should also "consider the impact of the defect in the notice of intention upon the homeowner's information about the status of the loan, and on his or her opportunity to cure the default." Id.

In the case at bar, Aurora asserts that allowing it to send corrected NOIs is the appropriate remedy. First, in each of the cases listed in Exhibits 1, 2, 3 & 4, the defendants were sent an NOI prior to the commencement of the foreclosure action. While the NOIs admittedly failed to provide the name and address of the lender, the NOI did inform the defendant of the situation,

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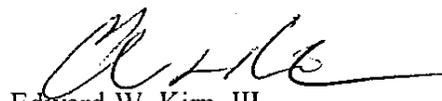
provided them with the correct amount needed to reinstate the loan, and also provided them with the necessary information to contact Aurora, the loan servicer, in the event they wished to discuss the matter. Therefore, the impact of the defect in the original NOIs appears to be minimal.

Further, allowing Aurora to send corrected NOIs to each defendant will afford the defendants an additional opportunity to cure the default without having to pay the attorney's fees and costs incurred. This remedy would be equitable to all parties involved. First, it affords the defendant's all the rights they would have been entitled to prior to the commencement of the case. Aurora will not be prejudiced by having to bear the cost and time of commencing a new foreclosure action and the valuable resources of the Court will not be wasted through this repetitive action. G.E. Capital Mortgage Services, v. Weisman, 339 N.J.Super. 590 (Ch.Div.2000).

Finally, in the event that the Court permits Aurora to send corrected NOIs, and the defendant fails to avail themselves of the opportunity to cure the default, Aurora will need to proceed to final judgment. Pursuant to the Court's April 4, 2012 Order, in such an instance, Aurora's counsel will have to submit a Certification of Diligent Inquiry which outlines therein with specificity, the steps taken to cure to deficient notice of intention. To that end, Aurora has attached hereto as Exhibit 6, a proposed form of CODI which it proposes to utilize. Aurora respectfully requests that the Court approve this form of CODI

Therefore, based upon the foregoing, Plaintiff respectfully requests that the Court enter the Order to Show Cause allowing the Plaintiff to send corrected NOIs in the uncontested, pre-judgment residential foreclosure matters listed in Exhibits 1,2,3 & 4 pursuant to the Supreme Court's Order of April 4, 2012.

Respectfully submitted,



Edward W. Kim, III

EWK.sb

POWERS KIRN, LLC
728 Marne Highway, Suite 200
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(856) 802-1000
Attorneys for Plaintiff

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SUPERIOR COURT
CLERK'S OFFICE
: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
:
: COUNTY
:
: Docket No. F-
:
: CIVIL ACTION
:
: **CERTIFICATION**
: **IN SUPPORT OF PLAINTIFFS'**
: **ORDER TO SHOW CAUSE**

**IN RE APPLICATION BY AURORA
FINANCIAL GROUP, INC., TO ISSUE
CORRECTED NOTICES OF INTENT
TO FORECLOSE ON BEHALF OF
IDENTIFIED FORECLOSURE
PLAINTIFFS IN UNCONTESTED
CASES**

Richard S. Favretto, Esquire, of full age, hereby certifies and says:

1. I am employed by Aurora Financial Group, Inc. ("Aurora"), servicer for New Jersey Housing and Mortgage Finance Agency at its Marlton, New Jersey office as a Default Manager, and as such, I have the authority to make and submit this certification, on behalf of Aurora.

2. I have personal knowledge of the facts contained in this certification by virtue of my position at Aurora and my familiarity with Aurora's practices and procedures, and based upon my review and analysis of the relevant business records and other documents of Aurora referenced and attached herein. More particularly, I am familiar with the systems of record that Aurora uses to create and record information related to the residential mortgage loans that it services, including the process by which Aurora's employees enter information in those systems. The records contained in those systems were made at or near the time of the occurrence of the matters set forth in the records. These records are maintained in the regular course of Aurora's

business as a lender and a loan servicer, it is the regular practice of Aurora to make such records, and Aurora relies on those records in the ordinary course of that business.

3. Aurora utilizes a fully automated software system entitled Financial Industry Computer Systems, (hereinafter, "FICS"). FICS is a "real-time" computerized system used in maintaining loan level servicing functions for escrow administration, collections, investor reporting, payments processing and year end reporting. FICS is a "real-time" system, meaning that all payments made to a particular loan are reflected in Aurora's system as soon as the payment is received. Aurora's business records are all made at or near the time of the occurrence of the event recorded, such as a payment being made or an escrow advance being disbursed, and are made by individuals with personal knowledge of the information being placed in the business record or from information transmitted by individuals with personal knowledge. The records are kept in the course of Aurora's regularly conducted business activities and it is the regular practice of Aurora to make and rely upon such business records. As a result, the foreclosing plaintiff is not likely to have possession or knowledge of the relevant servicing information in cases for which Aurora is servicing the mortgage loan.

4. I am making this certification in support of Plaintiffs' Order to Show Cause for matters which are serviced by Aurora Financial Group, Inc.

5. Aurora has identified a small pool of residential mortgage foreclosure matters filed prior to February 27, 2012 in which borrowers were sent NOIs which did not fully comply with the requirements of the Fair Foreclosure Act, N.J.S.A. 2A:50-56.

6. Attached as Exhibit 1 is a spreadsheet detailing 52 (fifty-two) residential mortgage foreclosure matters in which a Notice of Intent to Foreclose ("NOI") was sent to the borrower(s) that did not properly identify the lender and/or did not properly identify the lender's

address.

7. Attached as Exhibit 2 is a spreadsheet detailing 7 residential mortgage foreclosure matters in which a NOI was sent to the borrower(s) that contained a date by which to cure the default less than 30 (thirty) days from the date of the letter.

8. Attached as Exhibit 3 is a spreadsheet detailing 2 residential mortgage foreclosure matters in which a NOI was sent to the borrower(s) that failed to contain a telephone number to contact the loan servicer within the paragraph that advised the borrowers of their rights to contact the servicer with questions.

9. Attached as Exhibit 4 is a spreadsheet detailing 18 (eighteen) residential mortgage foreclosure matters in which a NOI was sent to borrower(s) who are currently under bankruptcy protection. Seventeen of these NOIs fail to properly identify the lender and provide the lender's address. One of these NOIs provides a cure date that is less than 30 (thirty) days from the date of the letter.

10. Attached as Exhibit 5 is Aurora's proposed form of NOI to be sent to the borrowers identified in Exhibits 1, 2, 3 & 4. Aurora asserts that this form of NOI is fully compliant with the requirements of the Fair Foreclosure Act.

I certify that the above facts are true. I am aware that if any of the above facts are willfully false I am subject to punishment.



Richard S. Favretto
Default Manager

DATED: 8-16-2012

Exhibit 1

Borrower(s)	Docket No.	Plaintiff	Property Address	Mailing Address
Baker, Khadija	F 012025 12	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent New Jersey Housing and Mortgage Finance Agency	13 Tremont Terrace Irvington, NJ 07111	11202 Crystal Ridge Road Watchung, NJ 07069
Patterson, Martin A.	F-42750-09	New Jersey Housing and Mortgage Finance Agency	311 Georgetown Road Carney's Point, NJ 08069	
Oglesby, Geraldine	F-6451-08	New Jersey Housing and Mortgage Finance Agency	505 South 13th St. Newark, NJ 07103	
Oglesby, Keyyonah	F-8915-09	New Jersey Housing and Mortgage Finance Agency	237 Arlington Avenue Jersey City, NJ 07305	
Carter, Michael	F-36390-09	New Jersey Housing and Mortgage Finance Agency	334 Hunterdon Street Newark, NJ 07103	
Carter, Juanita				
Asenuga, Kehinde				
Ricks, Anthony	F-40101-09	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent, New Jersey Housing and Mortgage Finance Agency	98 Kensington Drive Piscataway, NJ 08854	
Wiley, Katrina	F-42151-09	New Jersey Housing and Mortgage Finance Agency	234-236 Smith Street Newark, NJ 07106	
Josil, Lyonel	F-64979-09	New Jersey Housing and Mortgage Finance Agency	16 Towne Lane Trenton, NJ 08618	
White, James	F-48015-09	New Jersey Housing and Mortgage Finance Agency	23 Orange Street Trenton, NJ 08618	
Vitorino, Ricardo	F-12565-10	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent New Jersey Housing & Mortgage Finance Agency	546 Wood Avenue North Brunswick, NJ 08902	
Di Martino, Jr., Paul	F-02367-10	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent New Jersey Housing & Mortgage Finance Agency	107 Fulton Court North Brunswick, NJ 89020	

Brown, Terrance		New Jersey Housing and Mortgage Finance Agency	577 N 2nd Street Vineland, NJ 08360
Brown, Zaira	F-12230-10		
Jimenez, Jessica M.		New Jersey Housing and Mortgage Finance Agency	2282 Hill Crest Avenue Pennsauken, NJ 08110
Jimenez, Carlos A.	F-15131-10		
Bashaw, John P.		Police and Firemen's Retirement System Board of Trustees by its Administrative Agent New Jersey Housing & Mortgage Finance Agency	217 Swanstorm Place East Union, NJ 07083
Bashaw, Farnia	F-050155-10		
Labor, Joseph		New Jersey Housing and Mortgage Finance Agency	123 Canna Street Pemberton Township, NJ 08015
League, Jessica M.	F-17494-10		25 W. Whites Bog Rd. Browns Mills, NJ 08015 (Joseph) 1 Starling Lane Browns Mills, NJ 08015 (Jessica)
Harmon, Enoch	F-21770-10		
Green, Patrick	F-19790-10		
Cross, Steve	F-19787-10		
Arias, Mario		New Jersey Housing and Mortgage Finance Agency	213 Phillips Avenue Trenton, NJ 08638
Alvarado, Suguey A.	F-22514-10		
Zorgdrager, Beau J.	F-22729-10		
Frier, Coby		New Jersey Housing and Mortgage Finance Agency	555 15th Avenue Newark, NJ 07103
Frier, Deborah L.	F-27788-10		
Mattocks, Eric	F-24505-10		
Cutano, Keith		New Jersey Housing and Mortgage Finance Agency	108 Walnut Street Piscataway, NJ 08854
Horn, Vanessa R.	F-24337-10		
		New Jersey Housing and Mortgage Finance Agency	23 Long Valley Road Lodi, NJ 07644
		Roma Bank	14 Donald Place Berkeley Township, NJ 08721
		New Jersey Housing and Mortgage Finance Agency	11 Madison Court Southampton, NJ 08088
		New Jersey Housing and Mortgage Finance Agency	1354 Chesapeake Road Camden, NJ 08104
		New Jersey Housing and Mortgage Finance Agency	377 Reasoner Road Unit C Honolulu, HI 96819
		New Jersey Housing and Mortgage Finance Agency	165 Sextant Road Manahawkin, NJ 08050 (Keith) 11 Revere Court Barnegat, NJ 08005 (Vanessa)

Khan, Amar	F-24635-10	New Jersey Housing and Mortgage Finance Agency	720 S. New Rd., Apt. 5H Absecon, NJ 08201	4901 Harbor Beach Blvd., Apt R6 Brigantine, NJ 08203
Goodman, Jason W.		Police and Firemen's System Board of Trustees by its Administrative Agent	3 Lowrey Lane Raritan, NJ 08822	
Goodman, Sheri A.	F-26318-10	New Jersey Housing and Mortgage Finance Agency	131 New Rose St Trenton, NJ 08608	
Bailey, Sylvester T.	F-30958-10	New Jersey Housing and Mortgage Finance Agency	12 Faulkner Court Burlington Twp., NJ 08016	
Register, Thinisha	F-31801-10	New Jersey Housing and Mortgage Finance Agency	555 South Barnegat Ave Egg Harbor City, NJ 08215	
Hunter, Vicki	F-036058-10	New Jersey Housing and Mortgage Finance Agency	115 N. Harding Hwy. Landisville, NJ 08326	
Carter, Stephen		New Jersey Housing and Mortgage Finance Agency	3444 Buckingham Lane Pennsauken, NJ 08109	
Santiago, Cynthia	F-036859-10	New Jersey Housing and Mortgage Finance Agency		
Johnson, Tiffany T.	F-039789-10	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent	206 Hickorey Avenue Garwood, NJ 07027	
Woelpper, Robert		New Jersey Housing & Mortgage Finance Agency		
Woelpper, Kimberly A.	F-041593-10	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent	17 Cottonwood Trail Sparta, NJ 07871	
Casasanta, Nicola		New Jersey Housing and Mortgage Finance Agency	117 New Rose Street Trenton, NJ 08618	
Casasanta, Lisa M.	F-042446-10	New Jersey Housing and Mortgage Finance Agency		
Davis, Dina	F-049694-10	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent	2 Evana Road East Brunswick, NJ 08816	35 Mill Rd., Apt. 10A Edison, NJ 08817
Korff, Ian		New Jersey Housing & Mortgage Finance Agency		
Korff, Maricar	F-050163-10	New Jersey Housing & Mortgage Finance Agency		

Olivera, Aydil	F 008301 11	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent New Jersey Housing and Mortgage Finance Agency	57 New Street South River, NJ 08882
Giglio, Salvatore C.	F 009751 11	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent New Jersey Housing and Mortgage Finance Agency	9-C Court E Brick, NJ 08724
Halley, Jay Halley, Angela	F 010994 12	Police and Firemen's System Board of Trustees by its Administrative Agent New Jersey Housing and Mortgage Finance Agency	616 Kenmore Road Brick, NJ 08723
Hess, Donald Hess, Kathleen	F 005963 11	Police and Firemen's System Board of Trustees by its Administrative Agent New Jersey Housing & Mortgage Finance Agency	17 Jubilee Circle Aberdeen, NJ 07747
Prendeville, Michael Guglielmucci, Margaret	F 004459 11	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent New Jersey Housing and Mortgage Finance Agency	20 Greenhill Road Hardyston, NJ 07419
Rivera, Jesus Ruiz, Beatriz	F 004423 11	New Jersey Housing and Mortgage Finance Agency New Jersey Housing and Mortgage Finance Agency	12 Lansberry Drive Burlington Township, NJ 08016
Tangiisrael, Esther	F-035288-10	New Jersey Housing and Mortgage Finance Agency	2 Tuscany Terrace Lakewood, NJ 08701

Exhibit 2

Borrower(s)	Docket No.	Plaintiff	Property Address	Mailing Address
Wright, Christine	F-060811-10	New Jersey Housing and Mortgage Finance Agency	3717 Federal Street Pennsauken, NJ 08110	
Maccaroni, Anthony W. Gardee, Yasmyn S.	F 004467 11	New Jersey Housing and Mortgage Finance Agency	453-455 South Broad Street Trenton, NJ 08611	36 Wilfred Avenue Titusville, NJ 08530
Sanchez, Ophir	F 003836 12	New Jersey Housing and Mortgage Finance Agency	526 Royal Avenue Camden, NJ 08105	
Washington, Oni T. McCullough, Frank	F 004816 11	New Jersey Housing and Mortgage Finance Agency	403 Elmer Street Trenton, NJ 08611	
McCullough, Deborah Papahanges, Peter K. Papahanges, Patricia A.	F 005080 12 F 005565 12	Aurora Financial Group, Inc. Aurora Financial Group, Inc.	435 East Melrose Avenue Haddon Township, NJ 08108 645 Grant Avenue West Deptford, NJ 08086	
Zelinski, Kathleen M.	F 004876 12	Aurora Financial Group, Inc.	209 Nicholson Road Gloucester, NJ 08030	

Exhibit 3

Borrower(s)	Docket No.	Plaintiff Name	Property Address	Mailing Address
Zimmer, Christopher J.	F-000792-11	Aurora Financial Group, Inc.	65 Columbus Avenue Pemberton Township, NJ 08015	415 Spring Street Belvidere, NJ 07823
Papasidero, Michelle	F 008956 11	Aurora Financial Group, Inc.	10 Bayside Terrace North Ortley Beach, NJ 08751	

Exhibit 4

Borrower(s)	Docket No.	Plaintiff Name	Property Address	Mailing Address
Burgos, Maria	F-16938-07	New Jersey Housing and Mortgage Finance Agency	3096 South Congress Road Camden, NJ 08104	
Ellis, Rickita	F-047070-08	New Jersey Housing and Mortgage Finance Agency	25 Montgomery Place Trenton, NJ 08618	
Cintron, Enid	F-46198-09	New Jersey Housing and Mortgage Finance Agency	445 Reviam Ct. Vineland, NJ 08360	
McCargo, William E.	F-15126-10	New Jersey Housing and Mortgage Finance Agency	3726 Drexel Avenue Pennsauken, NJ 08105	
Scipio-Johnson, Doloris Johnson, Sidney	F-036231-10	New Jersey Housing and Mortgage Finance Agency	140 Fountain Ave Trenton, NJ 08618	
Platero, Carlos	F-036228-10	New Jersey Housing and Mortgage Finance Agency	162 Lower Main Street Aberdeen, NJ 07747	
Robinson, Armetha Robinson, Desaree	F-21634-06	New Jersey Housing and Mortgage Finance Agency	18 Monroe Street Trenton, NJ 08618	
Anderson, Jacqueline D.	F-8964-08	New Jersey Housing and Mortgage Finance Agency	1223 Whitman Ave Camden, NJ 08104	
Phox, Edwina P.	F-48348-08	New Jersey Housing and Mortgage Finance Agency	48 Carroll St. Trenton, NJ 08609	
Rubiera, Nelson E.	F-11905-09	New Jersey Housing and Mortgage Finance Agency	35 Ewing St., 2nd Floor Trenton, NJ 08609	
Uveges, Michael W.	F-35633-09	New Jersey Housing and Mortgage Finance Agency	27 Huntington Lane Willingboro, NJ 08046	
Alford, Donella	F-54351-09	New Jersey Housing and Mortgage Finance Agency	406 Reservoir Street Trenton, NJ 08618	
Holland, Natalie	F-6132-10	New Jersey Housing and Mortgage Finance Agency	123 North Third Street Millville, NJ 08332	
Jacobs, Giovanna T.	F 004439 11	New Jersey Housing and Mortgage Finance Agency	189 Keer Avenue Newark, NJ 07112	

Ingrum, Gregory	F-43279-08	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent, New Jersey Housing and Mortgage Finance Agency	13 Golf Drive Hamilton Twp., NJ 08330
Stasil, Thomas R.	F-555-09	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent, New Jersey Housing and Mortgage Finance Agency	831 Newmans Lane Martinsville, NJ 08836
McClellan, Mark McClellan, Jill	F-06764-10	Police and Firemen's Retirement System Board of Trustees by its Administrative Agent New Jersey Housing & Mortgage Finance Agency	12 Cranmer Court Little Egg Harbor, NJ 08087
Benton, Barbara Lynette	F-060786-10	New Jersey Housing and Mortgage Finance Agency	1040 Genesee St Trenton, NJ 08610

Exhibit 5



AURORA

Financial Group, Inc.

RE: AFG#

NOTICE OF INTENTION TO ACCELERATE AND FORECLOSURE

Dear : Mortgagor(s)

Please be advised that you are in default of your obligations pursuant to the above referenced obligation for failure to pay regularly monthly mortgage payments. You are due for the months through Aurora Financial Group, Inc. intends to foreclose the mortgage with the current principal balance of \$ with regard to the property located at:

You have the right to cure the default as provided in Section 5 of the Fair Foreclosure Act, Title 2A, Chapter 50 of the New Jersey Statutes. In order to cure your default, you must pay to Aurora Financial Group, Inc. the sum of \$ on or before the end of this month. If the quoted amount is paid on or before the above date, your account will be current. In the event payments are not received by the end of this month, you must pay the next month's installment in the amount of \$ in addition to the arrearage to cure your account by

All payments must be tendered in the form of certified check, money order or cashier's check.

All payments should be made to: Aurora Financial Group, Inc
9 Eves Drive, Suite 190
P.O. Box 288
Marlton, NJ 08053

Attention: Lou Spiritoso
Collection Manager
(800) 648-0345 x118

If you do not cure the default set forth above by , Aurora Financial Group, Inc. will take steps to terminate your ownership interest in the above referenced property by commencing a foreclosure suit in the Superior Court of New Jersey. If you fail to cure the default by the above specified date and Aurora Financial Group, Inc. refers this matter to our attorney for institution of a foreclosure suit in the Superior Court of New Jersey, you still retain the right to cure the default pursuant to Section 5 of the Fair Foreclosure Act up to the time of the entry of a final foreclosure judgment or an order of the redemption, but you shall be responsible for Aurora's court cost and attorney's fees in an amount not to exceed that amount permitted pursuant to the rules governing the courts of New Jersey.



AURORA

Financial Group, Inc.

PAGE 2
ACCELERATION

You may have the right to transfer the real estate to another person subject to the mortgage and the transferee has the right to cure the default as provided in the Fair Foreclosure Act, subject to the terms and conditions of the mortgage.

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 your property is located. See the attached.

Financial Assistance for curing a 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. You may contact the Commissioner of Banking at 20 W. State Street, CN-40, Trenton, New Jersey 08625 or by calling (609) 292-7272. A list of possible sources for assistance is enclosed herewith.

The current holder of your Note and Mortgage is

You may contact Lou Spiritoso at Aurora Financial Group, Inc. at 1-800-362-8948 ext 118 if you disagree with Aurora's assertion that a default has occurred or the correctness of Aurora's calculation of the amount required to cure the default.

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

Sincerely,

Rich Favretto
Default Manager
Loan Servicing Division
Aurora Financial Group, Inc.

enc.

Certified Mail #

foreclos2

Exhibit 6

POWERS KIRN, LLC
728 Marne Highway, Suite 200
Moorestown, NJ 08057
(856) 802-1000
Attorneys for Plaintiff

Plaintiff

vs.

Defendant(s)

: SUPERIOR COURT OF NEW JERSEY
: CHANCERY DIVISION
: _____ COUNTY
:
: Docket No. F- _____
:
: CIVIL ACTION
:
**RULE 4:64-2(d) CERTIFICATION OF
DILIGENT INQUIRY AND ACCURACY OF
FORECLOSURE DOCUMENTS AND
FACTUAL ASSERTIONS**

_____, Esquire, of full age, hereby certifies and says:

1. I am an attorney at law duly licensed to practice in the state of New Jersey and am affiliated with the Law Firm of Powers Kirn, LLC, the attorneys of record for Plaintiff in the above-captioned residential mortgage foreclosure action. I am responsible for this mortgage foreclosure action and am fully familiar with the pleadings and documents filed in this action and the facts set forth in this certification.

2. On [*insert date(s)*], I communicated by [*insert mode of communication*] with the following named employee(s) of [*insert the name of the plaintiff or the name of the plaintiff's mortgage loan servicer*], who informed me that he/she personally reviewed the certification of amount due and the original or true copy of the note, mortgage and recorded assignments, if any, about to be submitted to the Court; and that he/she confirmed the accuracy of those documents:

Name of employee(s):

Title of employee(s):

Responsibilities of employee(s):

3. In accordance with the Supreme Court's decision in US Bank, N.A. v. Guillaume and the April 4, 2012 Order of the Supreme Court, a corrected Notice of Intent to Foreclose was served in this case on the Defendant(s) pursuant to the Order of the Court in In re Application by Aurora Financial Group to Issue Corrected Notices of Intent to Foreclose on Behalf of Identified Foreclosure Plaintiffs, Docket Number F-_____ -12. Based on my communication with the above-named employee(s) of the Plaintiff or the Plaintiff's mortgage loan servicer, the Defendant(s) did not reinstate or cure the default within the permitted time period.

4. Based on my communication with the above-named employee of Plaintiff or the Plaintiff's mortgage loan servicer, as well as my own inspection of the documents about to be filed with the Court and other diligent inquiry, I execute this certification to comply with the requirements of Rule 4:64-2(d) and Rule 1:4-8(a).

5. I am aware that I have an continuing obligation under Rule 1:4-8 to amend this certification if a reasonable opportunity for further investigation or discovery indicates insufficient evidentiary support for any factual assertions proffered by plaintiff in any court filings or documents in this case.

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.

/s/ Attorney

Dated:

NOTICE **RECEIVED**

AUG 20 2012

Docket No. : F-
Superior Court of New Jersey
Chancery Division

SUPERIOR COURT
CLERK'S OFFICE

STATE OF NEW JERSEY TO:

**Any defendant in an uncontested
residential mortgage foreclosure action in
which Aurora Financial Group, Inc. is the
Plaintiff or Servicer**

YOU ARE HEREBY ORDERED TO SHOW CAUSE why the relief requested by Aurora Financial Group, Inc. 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 F-_____ 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 Aurora Financial Group, Inc. to re-send Notices of Intention to Foreclose pursuant to the process established by the Supreme Court of New Jersey on April 4, 2012. Any objection 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 objection must also be sent to Honorable Paul Innes, P.J.Ch., Mercer County Courthouse, 175 S. Broad Street, P.O. Box 8068, Trenton, NJ 08650 and Edward Kim, Esq., 728 Marne Highway, Suite 200, P.O. Box 848, Moorestown, NJ 08057. Any objection must be filed no later than <INSERT DATE>. If timely objection is filed, the Court may conduct oral argument on <INSERT DATE>. If no timely objection 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. Powers Kim, LLC encourages and supports the equal housing practices of the Fair Housing Act in the conduct of its business."



AURORA

Financial Group, Inc.

RECEIVED

AUG 20 2012

SUPERIOR COURT
CLERK'S OFFICE

Please read this letter and the enclosed documents carefully, as they contain important information concerning your rights.

Dear Borrower:

Aurora Financial Group, Inc. ("Aurora") is the servicer of your mortgage loan. Our records show that your loan is in default and you have breached the terms of the note and mortgage, deed of trust, or other security agreement securing your loan.

You were previously sent a Notice of Intent to Foreclose pursuant to the New Jersey Fair Foreclosure Act ("the Act"), and judicial foreclosure proceedings are pending against you.

On February 27, 2012, the Supreme Court of New Jersey issued an opinion in the matter of U.S. Bank, N.A. v. Guillaume, interpreting the requirements of the Notice of Intent to Foreclose under the Act. For you, this means that the Notice of Intent to Foreclose previously sent to you may not have complied with all applicable provisions of the Act. Specifically, the Notice of Intent to Foreclose may not have included the name and address of the lender, may not have included the telephone number of a representative of the lender, and/or may not have listed a date thirty days from the date of the letter by which to cure the default.

Aurora has obtained an order from a Judge of the Superior Court (the "Order") authorizing Aurora to send you a corrected Notice of Intent to Foreclose. A copy of the Order and the corrected Notice of Intent to Foreclose are enclosed. Please read these documents carefully.

The corrected Notice of Intent to Foreclose 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 Aurora, and information about retaining counsel and borrower assistance. 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 NOI will list the name and address of the current lender on your loan. As set forth in the corrected Notice of Intent to Foreclose, the default may be cured on or before the date indicated therein. If you fail to cure the default by the date set forth in the corrected Notice of Intent to Foreclose, the foreclosure action against you will proceed.

If you wish to object to the issuance of the corrected Notice of Intent to Foreclose or if you wish to object to the content of the corrected Notice of Intent to Foreclose, you will have until _____ in which to object. Any objections to the Order to Show Cause shall be made in writing and the original documents must be filed with the Clerk of the Superior Court in Mercer County, New Jersey at 175 S. Broad Street, Trenton, New Jersey. You must also send a copy of your opposition papers directly to Judge Paul Innes, whose address is 175 S. Broad Street, P.O. Box 8068, Trenton, NJ 08650 and to Aurora's attorney, Edward Kim, Esq., Powers Kim, LLC, 728 Marne Hwy., Suite 200, Moorestown, NJ 08057. A telephone call will not protect your rights; you must file your opposition and serve your opposition on Aurora's attorneys, if you want the Court to hear your opposition to the relief that Aurora is seeking.

If you have questions concerning your loan, please call [**individual listed on NOI**] at xxx-xxx-xxxx. Additional contact information is provided in the corrected Notice of Intent to Foreclose.

Sincerely,

Aurora Financial Group, Inc.
Phone numbers

Enclosures

-corrected Notice of Intent to Foreclose

-Order of the Superior Court