

#2012-3040

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

**RECEIVED**  
DEC 5 2012  
**PAUL INNES, J.J.C.**

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	: SUPERIOR COURT OF NEW JERSEY
	: CHANCERY DIVISION
<b>IN RE APPLICATION BY AURORA</b>	:
<b>FINANCIAL GROUP, INC., TO ISSUE</b>	: MERCER COUNTY
<b>CORRECTED NOTICES OF INTENT</b>	:
<b>TO FORECLOSE ON BEHALF OF</b>	: DOCKET NO.: F-16932-12
<b>IDENTIFIED FORECLOSURE</b>	:
<b>PLAINTIFFS IN UNCONTESTED</b>	: CIVIL ACTION
<b>CASES</b>	:
	: NOTICE OF MOTION ON SHORT NOTICE
	: TO PUBLISH OUT OF TIME THE LEGAL
	: NOTICE OF PLAINTIFF'S ORDER TO
	: SHOW CAUSE

PLEASE TAKE NOTICE that as soon as counsel can be heard, the undersigned attorneys for the Plaintiff will apply to the Honorable Paul Innes, Judge of the Superior Court, or such other Chancery Division Judge as shall be hearing motions on that day, at the Mercer County Courthouse at Trenton, New Jersey, for the following relief:

1. For permission to publish out of time the legal notice required by this Court's Order of October 25, 2012, as it pertains to the notice to be published in the Press of Atlantic City.
2. For permission that Plaintiff may cause the requisite notice to be published on December 7, 2012 and December 14, 2012 in the Press of Atlantic City.

TAKE FURTHER NOTICE that plaintiff waives oral argument and submits this matter on the papers per Rule 1:6-2.

POWERS KIRN, LLC

Attorneys for Plaintiff

By: Megan E. Shafranski  
Megan E. Shafranski

Dated: December 4, 2012

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

**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  
:  
: MERCER COUNTY  
:  
: Docket No. F-16932-12  
:  
: CIVIL ACTION  
:  
: SUPPLEMENTAL ATTORNEY  
: CERTIFICATION  
: IN SUPPORT OF PLAINTIFFS'  
· ORDER TO SHOW CAUSE  
:  
: APPLICATION ON SHORT NOTICE

Megan E Shafranski, Esquire, of full age, hereby certifies and says:

1. I am an attorney at law in the State of New Jersey and the attorney responsible for the management of the within action and as such, I have the authority to make and submit this certification on behalf of Plaintiff Aurora Financial Group, Inc. ("Aurora").

2. Aurora filed the within action on or about August 20, 2012, in which Aurora seeks to send remediated Notices of Intent to Foreclose ("NOIs") in an identified population of residential mortgage foreclosure matters in which Aurora is the servicer.

3. Pursuant to the Court's directive, our office caused the requisite notices to be placed in several newspapers to run on November 22 and November 29, 2012, concurrent with regular and certified mailings to the Defendants. One such newspaper was the Press of Atlantic City.

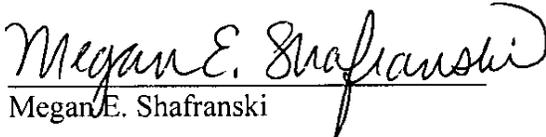
4. Inadvertently, and by its own admitted mistake, the Press of Atlantic City did not

cause the notices to run on the dates selected. *See attached email correspondence between Amber Hatten, legal assistant with Powers Kirn, LLC, and representative Tyshawn of the Press of Atlantic City's Legal Advertising department.*

5. Plaintiff now seeks the Court's permission to allow the notices which were to run in the Press of Atlantic City on November 22 and November 29, 2012 to be instead run on December 7 and December 14, 2012, without disruption to the return date of the instant Order to Show Cause (currently scheduled for January 17, 2013). Defendants are permitted to object to the Order to Show Cause by December 26, 2012.

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.

DATED: 12/4/12

  
Megan E. Shafranski

## Amber Hatten

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**From:** classlegal [classlegal@pressofac.com]  
**Sent:** Tuesday, December 04, 2012 9:47 AM  
**To:** Amber Hatten  
**Subject:** RE: legal ad- please confirm

Hello Amber,

The notice that was sent on November 13, 2012 was sent to the classified advertising email address. The notice was never forwarded to the legal department. Due to this oversight the notice did not run as requested.

Thank You,

Tyshawn

Press of Atlantic City Legal Advertising

Phone - 1-866-568-7224 ext. 6627

Fax - 609-272-7085

Email - classlegal@pressofac.com

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**From:** classad  
**Sent:** Mon 12/3/2012 4:40 PM  
**To:** classlegal  
**Subject:** FW: legal ad- please confirm

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**From:** Amber Hatten [mailto:amber.hatten@powerskirk.com]  
**Sent:** Mon 12/3/2012 4:36 PM  
**To:** classad  
**Subject:** FW: legal ad- please confirm

Please advise if the proof of publications have been sent to our office.

Thank you

*Amber M. Hatten*

**Powers Kirn, LLC**

**New Jersey Foreclosures**

**Service Department (H-N)**

728 Marne Highway, Suite 200

Moorestown, NJ 08057

Tel: 856-802-1000 x1239

Fax: 856-802-4300

Email: amber.hatten@powerskirk.com

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This communication may be an attempt to collect a debt and therefore, any information obtained may be used for that purpose

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you have received this message in error, you are hereby notified that we do not consent to any reading, dissemination, distribution or copying of this message. If you have received this communication in error, please notify the sender immediately and destroy the transmitted information.

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**From:** Amber Hatten  
**Sent:** Tuesday, November 13, 2012 4:00 PM  
**To:** 'classad@pressofac.com'  
**Subject:** legal ad- please confirm  
**Importance:** High

**Hello- as per my telephone conversation- Please run the following ad in the Press of Atlantic City on BOTH November 22<sup>nd</sup> AND November 29<sup>th</sup>.**

**Please send a copy of each publication to back to our office.**

**Please confirm. Thank you**

**NOTICE**

Docket No. : F-16932-12  
Superior Court of New Jersey  
Chancery Division

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-16932-12 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 December 26, 2012. If timely objection is filed, the Court may conduct oral argument on January 17, 2013. 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, 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 Kirn, LLC encourages and supports the equal housing practices of the Fair Housing Act in the conduct of its business "

*Amber M. Hatten*

**Powers Kirn, LLC**

**New Jersey Foreclosures**

**Assistant Team Lead**

**Service Department**

**728 Marne Highway, Suite 200**

**Moorestown, NJ 08057**

**Tel: 856-802-1000 x1239**

**Fax:856-802-4300**

**Email: [amber.hatten@powerskirn.com](mailto:amber.hatten@powerskirn.com)**

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**This communication may be an attempt to collect a debt and therefore, any information obtained may be used for that purpose.**

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If you have received this message in error, you are hereby notified that we do not consent to any reading, dissemination, distribution or copying of this message. If you have received this communication in error, please notify the sender immediately and destroy the transmitted information.

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This message is only intended for the recipient(s). Employees are expressly required not to make defamatory statements and not to infringe or authorize any infringement of copyright or any other legal right by email communications. Any such communication is contrary to company policy and outside the scope of the employment of the individual concerned. Press of Atlantic City Media Group will not accept any liability in respect of such communication, and the employee responsible will be personally liable for any damages or other liability arising. Employees who receive such an email must notify their supervisor immediately.

2012-3040

**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  
:  
:  
: Docket No. F- 16932-12  
:  
: CIVIL ACTION  
:  
: **PROOF OF MAILING**  
:

1. I, the undersigned, am a legal assistant with POWERS KIRN, LLC, attorneys for Plaintiff in the above entitled matter.

2. On November 21, 2012, I mailed in the United States Post Office in Moorestown, New Jersey, a sealed envelope with postage prepaid thereon, by certified and regular mail, return receipt requested to the defendants listed on Schedule A attached hereto.

containing a copy of filed Order to Show Cause, Verified Complaint, Certification, Supplemental Certification, Cover Letter, and Corrected NOI.

3. On December 19, 2012, I mailed in the United States Post Office in Moorestown, New Jersey, a sealed envelope with postage prepaid thereon, by certified and regular mail, return receipt requested to the defendants listed on Schedule B attached hereto.

containing a copy of Cover Letter and Corrected NOI.

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 wilfully false, I am subject to punishment.

  
Shelby L. Brownlee

Dated: January 8, 2013

December 4, 2012

VIA FAX TO 609-571-4808  
Hon. Paul Innes  
Superior Court of New Jersey  
Chancery Division  
175 South Broad Street  
Trenton, NJ 08650

RECEIVED

DEC 5 2012

PAUL INNES, J.&C.

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

Re 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  
Docket No. F-16932-12

Dear Judge Innes:

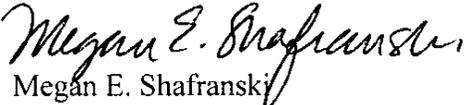
Please accept this letter and supporting attorney certification in support of Plaintiff's application on short notice to permit publication. As you know, this Order to Show Cause is returnable on January 17, 2013.

Pursuant with the Court's directive, we requested that notices regarding same be published in newspapers around the state. Today, our firm was informed by staff at the Press of Atlantic City that our requested notices did not in fact run as requested due to internal oversight by the staff of that newspaper *See attached certification and email correspondence.*

Kindly advise the Court's decision as quickly as possible.

Thank you for your kind attention to this matter.

Very truly yours,

  
Megan E. Shafranski

MES:mges  
#2012-3040