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January 9, 2013

Honorable Paul Innes
Superior Court of New Jersey
Chancery Division
175 South Broad Street
Trenton, NJ 08650

William M.E. Powers, Jr
William M.E. Powers, III
Sarah E. Powers
Edward W. Kirn, 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:

Kindly accept this letter brief in lieu of a more formal brief in reply to Defendant Eric Mattocks' Objection to the Application by Aurora Financial Group, Inc. to Issue Corrected Notices of Intent to Foreclose on Behalf of Identified Foreclosure Plaintiffs in Uncontested Cases, which is returnable on Thursday, January 17, 2013.

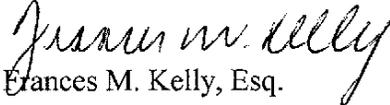
Plaintiff submits that the Defendant's letter is not an objection pursuant to Your Honor's October 25, 2012 Order ("Order"). Plaintiff, however, will briefly address the Defendant's letter.

Firstly, the Defendant's letter fails to object to the Order to Show Cause process as set forth in the Order. Defendant merely requests additional time to obtain assistance from Legal Services. Defendant fails to specifically state the basis for his objection as required by the Order. Defendant neither objects to the procedure established by the Supreme Court regarding the corrected Notice of Intention to Foreclose nor to the corrected Notice of Intention to Foreclose.

Additionally, Defendant failed to follow the proper procedure outlined in the Order for serving objections. Defendant is required to serve a copy of his objection to the Order to Show Cause upon Edward W. Kirn, III, Esquire at the address set forth in the Order. The Order further states that the objection must be filed no later than December 26, 2012. Defendant submitted a letter, dated January 2, 2013, to Your Honor's Chambers, which was stamped received on January 7, 2013. A copy of this letter was not served upon Mr. Kirn as required by the Order. In fact, our office did not have knowledge of the defendant's letter until January 8, 2013 when Your Honor's Law Clerk faxed our office a copy of same.

Based on the foregoing, Plaintiff respectfully requests that this Court overrule the Defendant's objection, and enter a Final Order in this matter finding that the Notices of Intention to Foreclose sent to the named foreclosure defendants are deemed corrected and permitting the named foreclosure actions to proceed in the ordinary course.

Respectfully Submitted,


Frances M. Kelly, Esq.

#2012-3040

FMK:slb

cc: Eric D. Mattocks

#2012-3040

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Moorestown, NJ 08057
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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**
:
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1. I, the undersigned, am a legal assistant with POWERS KIRN, LLC, attorneys for Plaintiff in the above entitled matter.

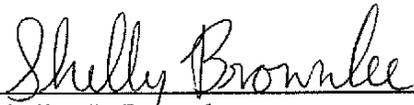
2. On January 9, 2013, I mailed in the United States Post Office in Moorestown, New Jersey, a sealed envelope with postage prepaid thereon, by certified and regular mail, return receipt requested, addressed to:

Eric D. Mattocks
1354 Chesapeake Road
Camden, NJ 08104

CMRRR# 7012 2210 0000 6644 7507

containing a copy of Reply Brief.

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 9, 2013