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	)	SUPERIOR COURT OF NEW JERSEY
	)	CHANCERY DIVISION
<b>IN RE APPLICATION BY JPMORGAN</b>	)	PASSAIC COUNTY
<b>CHASE BANK, N.A. TO ISSUE</b>	)	
<b>CORRECTED NOTICES OF INTENT</b>	)	<b>DOCKET NO.: F -021218-12</b>
<b>TO FORECLOSE ON BEHALF OF</b>	)	
<b>IDENTIFIED FORECLOSURE</b>	)	<u><b>CIVIL ACTION</b></u>
<b>PLAINTIFFS IN UNCONTESTED</b>	)	
<b>CASES</b>	)	
	)	<b>VERIFIED COMPLAINT IN SUPPORT</b>
	)	<b>OF SUMMARY ACTION</b>
	)	

JPMorgan Chase Bank, N.A., ("JPMC"), on behalf of itself and authorized to act on behalf of the plaintiffs in pending, uncontested, pre-judgment foreclosure actions ("Foreclosure Plaintiffs"), brings this action pursuant to the April 4, 2012, Order of the New Jersey Supreme Court (the "April 4<sup>th</sup> Order"), that was entered following the Court's decision in U.S. Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), ("Guillaume"). JPMC respectfully states as follows:

1. JPMC is a national banking association and a wholly-owned subsidiary of JPMorgan Chase & Co., a bank holding company.

2. JPMC services mortgage loans for residential properties in New Jersey.<sup>1</sup>

3. When JPMC is the servicer of a loan, it undertakes payment collection, loss mitigation (modifications, short sales, deeds in lieu) and collection efforts, including foreclosure, with respect to a mortgage loan. If a loan is owned by another entity, JPMC undertakes these efforts in accordance with the contracts that govern its relationship with the owner of the loan as well as the loan documents, rules of Court and any applicable laws. As the entity collecting and processing payments, JPMC has the information relevant to the payments, escrows paid, amounts due and whether a loan is in default and by how much. This information is maintained on JPMC's systems of record. In cases in which JPMC is only the servicer (and not also the lender), the lender is not likely to have possession of the relevant servicing information, as was recognized by the Supreme Court when it revised the Court Rules governing foreclosures at R. 4:64-1 and R. 4:64-2 in June, 2011. JPMC makes this application to the Court on its behalf and pursuant to the authority granted to JPMC as the servicing agent of Foreclosure Plaintiffs in pending foreclosure cases.

4. The identities of the Foreclosure Plaintiffs in the foreclosure cases for which JPMC is seeking to issue corrected Notices of Intent are identified alphabetically in the Counts 1 through 45. Attached as Exhibits 1 through 45 to each of those Counts are the current lists of the pending foreclosure cases that require corrected NOIs (collectively referred to hereafter as the "Corrected NOI List").

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<sup>1</sup> JPMC is successor by merger to Chase Home Finance LLC. JPMC also acquired servicing rights from EMC Mortgage LLC f/k/a EMC Mortgage Corporation and Washington Mutual Bank. JPMC also appears as a plaintiff in foreclosure proceedings in its capacity as a trustee for the owners of securitized loans. This current application to the Court does not include those cases in which JPMC acts only as a trustee, and not the servicer.

5. One of the duties of a servicer on a defaulted mortgage loan in New Jersey is to prepare and serve the Notice of Intent to Foreclose ("NOI"), in accordance with the applicable contracts and as required by N.J.S.A. 2A:50-56 of the Fair Foreclosure Act. The NOI is prepared based on current loan information held by JPMC and includes, among other data elements, information about the amount that is required to reinstate the loan and the date by which reinstatement must occur.

6. On February 27, 2012, the Supreme Court decided Guillaume and held that the Fair Foreclosure Act requires strict adherence to the notice requirements set forth in N.J.S.A. 2A:50-56(c) for all NOIs. The Court further held that a court adjudicating a foreclosure action in which the strict requirements of N.J.S.A. 2A:50-56 were not followed has the discretion to choose the appropriate remedy, permitting a cure of the deficient NOI, or imposing such other remedy as may be appropriate to the specific case.

7. Following its decision in Guillaume, the Court entered the April 4<sup>th</sup> Order which authorizes the Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage, and the Hon. Paul Innes, P.J.Ch., Mercer Vicinage, to entertain summary actions by Orders to Show Cause as to why Plaintiffs in any uncontested residential mortgage foreclosure actions filed on or before February 27, 2012, in which final judgment has not been entered, who caused NOIs to be served that are deficient under the Fair Foreclosure Act, N.J.S.A. 2A:50-56, should not be allowed to serve corrected NOIs on defendant/mortgagors and/or parties obligated on the debt (the "Foreclosure Defendants").

8. The April 4<sup>th</sup> Order further states that any corrected NOI must be accompanied by a letter to the Foreclosure Defendants setting forth the reasons why the corrected NOI is being served, the procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI,

the name of a person to contact with any questions, and that the receipt of the corrected NOI allows Foreclosure Defendants 30 days<sup>2</sup> in which to object or to cure the default.

9. JPMC has identified a population of foreclosure cases in which the previously served NOIs failed to include the name and address of the lender, as required by N.J.S.A. 2A:50-56(c)(11). JPMC has also determined that it may lack sufficient information to verify the facts surrounding the mailing of the original NOI (*e.g.*, JPMC may lack proof of mailing for an NOI mailed by a vendor; or JPMC may lack a certified mail receipt for an NOI). These foreclosure matters are listed on the Corrected NOI List. The Corrected NOI List was reviewed for accuracy to verify the status of the foreclosures, the effect of loss mitigation on pending foreclosures, whether there are relevant bankruptcy proceedings and whether, since the original NOIs were sent, there were intervening deaths of Foreclosure Defendants.

10. The Corrected NOI List attached as Exhibits 1 through 45 includes the portfolio of loans that are pre-judgment, uncontested foreclosures that JPMC is servicing and in which deficient NOIs were served by JPMC and/or JPMC may lack sufficient information to verify mailing. Specifically, as directed by the Supreme Court in Guillaume and the April 4<sup>th</sup> Order, the Corrected NOI List includes a listing of: uncontested foreclosures that were filed on or before February 27, 2012 and which JPMC is servicing the loans in which final judgment has not been entered, and in which JPMC is seeking leave to file a corrected NOI.

11. The Corrected NOI List identifies (1) the name of the Plaintiff in the foreclosure action, (2) the name of the Foreclosure Defendant, (3) the foreclosure docket number, (4) the vicinage, (5) whether the foreclosure was contested; (6) the name of the foreclosure attorney, and

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<sup>2</sup> JPMC will provide borrowers 35 days from the date of the corrected NOI, as reflected in the correspondence that will be sent to the borrowers.

(7) whether the foreclosure is currently on hold (e.g., bankruptcy; loss mitigation).<sup>3</sup> While JPMC is not the Plaintiff in each of the foreclosure actions, it is the servicer of each such loan, maintains the records for each such loan, and is responsible for mailing the corrected NOI pursuant to the relevant contracts with the Foreclosure Plaintiffs.

12. To comply with the April 4<sup>th</sup> Order, attached as Exhibit "A" to the Verified Complaint is the proposed form of letter ("Explanatory Letter") that JPMC intends to send to each Foreclosure Defendant. In accordance with the Supreme Court in the April 4<sup>th</sup> Order, the proposed form of Explanatory Letter:

- a. explains the reason why the corrected NOI is being served,
- b. explains the procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI,
- c. borrower name, loan number, plaintiff and a docket number for the underlying foreclosure action,
- d. identifies the individual(s) a Foreclosure Defendant should contact with any questions, and
- c. advises the Foreclosure Defendant of the right to object to the corrected NOI as well as the right to cure the default within 35 days of the date of the corrected NOI.

The corrected NOIs will exclude attorneys' fees and costs incurred in the pending foreclosure cases.

13. Attached as Exhibit "B" to the Verified Complaint is the proposed form of corrected NOI which JPMC will send to each of the Foreclosure Defendants identified on the Corrected NOI List. Each Foreclosure Defendant will be served with a corrected NOI that

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<sup>3</sup> Because considerable time has passed since NOIs were originally sent in the foreclosure actions, the Foreclosure Plaintiff initially identified in the caption may not be the current correct entity that will be listed in the corrected NOI. For sake of clarity, the corrected NOI will list the current lender and lender's address and JPMC will require that foreclosure counsel take appropriate steps to change the plaintiff in affected foreclosure actions where required.

includes, *inter alia*, the information specific to their mortgage loan, their default, the lender/holder's name and address and the amount to reinstate, as provided for in the Order to Show Cause.

**COUNT 1 - ADVANTA MORTGAGE CORP.**

14. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Advanta Mortgage Corp. and/or certain of its affiliated entities pursuant to an agreement between the parties.

15. Attached as Exhibit 1 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Advanta Mortgage Corp. (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 2 - AHMANSON OBLIGATION CO.**

16. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Ahmanson Obligation Co. and/or certain of its affiliated entities pursuant to an agreement between the parties.

17. Attached as Exhibit 2 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Ahmanson Obligation Co. (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 3 - BAC HOME LOANS**

18. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of BAC Home Loans and/or certain of its affiliated entities pursuant to an agreement between the parties.

19. Attached as Exhibit 3 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure action was brought in the name of BAC Home Loans (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 4 - BANK OF AMERICA**

20. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Bank of America and/or certain of its affiliated entities pursuant to an agreement between the parties.

21. Attached as Exhibit 4 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure action was brought in the name of Bank of America (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 5 - CAPITAL ONE**

22. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Capital One and/or certain of its affiliated entities pursuant to an agreement between the parties.

23. Attached as Exhibit 5 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Capital

One (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 6 - CAPITAL FINANCIAL MORTGAGE CORP.**

24. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Capital Financial Mortgage Corp and/or certain of its affiliated entities pursuant to an agreement between the parties.

25. Attached as Exhibit 6 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Capital Financial Mortgage Corp (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 7 - CITIBANK**

26. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Citibank and/or certain of its affiliated entities pursuant to an agreement between the parties.

27. Attached as Exhibit 7 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Citibank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 8 - COLUMBIA BANK**

28. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Columbia Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

29. Attached as Exhibit 8 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Columbia Bank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 9 - COMMERCE BANCORP**

30. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Commerce Bancorp and/or certain of its affiliated entities pursuant to an agreement between the parties.

31. Attached as Exhibit 9 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Commerce Bancorp (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 10 - COUNTRYWIDE**

32. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Countrywide and/or certain of its affiliated entities pursuant to an agreement between the parties.

33. Attached as Exhibit 10 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of

Countrywide (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

#### **COUNT 11 - CTX**

34. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of CTX and/or certain of its affiliated entities pursuant to an agreement between the parties.

35. Attached as Exhibit 11 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure action was brought in the name of CTX (or its affiliates) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

#### **COUNT 12 - DEUTSCHE BANK**

36. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Deutsche Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

37. Attached as Exhibit 12 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure action was brought in the name of Deutsche Bank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 13 - DOLLAR BANK**

38. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Dollar Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

39. Attached as Exhibit 13 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Dollar Bank (or its affiliates) in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 14 - DYNAMIC FINANCIAL**

40. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Dynamic Financial and/or certain of its affiliated entities pursuant to an agreement between the parties.

41. Attached as Exhibit 14 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Dynamic Financial (or its affiliates) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 15 - EASTERN AMERICAN**

42. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Eastern American and/or certain of its affiliated entities pursuant to an agreement between the parties.

43. Attached as Exhibit 15 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Eastern American (or its affiliated entities) and in which JPMC previously served a NOI that did

not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 16 - EMC**

44. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of EMC and/or certain of its affiliated entities pursuant to an agreement between the parties.

45. Attached as Exhibit 16 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of EMC (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 17 - FHLMC**

46. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of FHLMC and/or certain of affiliated entities pursuant to an agreement between the parties.

47. Attached as Exhibit 17 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of FHLMC (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 18 - FIRST HORIZON**

48. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of First Horizon and/or certain of its affiliated entities pursuant to an agreement between the parties.

49. Attached as Exhibit 18 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of First Horizon (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 19 - FNMA**

50. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of FNMA and/or certain of its affiliated entities pursuant to an agreement between the parties.

51. Attached as Exhibit 19 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of FNMA (or its entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 20 - GNMA**

52. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of GNMA and/or certain of its affiliated entities pursuant to an agreement between the parties.

53. Attached as Exhibit 20 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of GNMA (or its affiliated entities) and in which JPMC previously served a NOI that did not

include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 21 - HOMESALES, INC.**

54. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Homesales, Inc. and/or certain of its affiliated entities pursuant to an agreement between the parties.

55. Attached as Exhibit 21 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Homesales, Inc. (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 22 - HSBC**

56. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of HSBC and/or certain of its affiliated entities pursuant to an agreement between the parties.

57. Attached as Exhibit 22 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of HSBC (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 23 - HUDSON CITY**

58. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Hudson City and/or certain of its affiliated entities pursuant to an agreement between the parties.

59. Attached as Exhibit 23 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Hudson City (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 24 - INVESTOR SAVINGS BANK**

60. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Investor Savings Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

61. Attached as Exhibit 24 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Investor Savings Bank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 25 - JPMORGAN CHASE BANK, N.A.**

62. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of JP Morgan Chase Bank, N.A. (and/or certain of its predecessors, subsidiaries or affiliated entities) pursuant to an agreement between the parties.

63. Attached as Exhibit 25 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of JP

Morgan Chase Bank, N.A. and/or its predecessors, subsidiaries or its affiliated entities and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 26 - LASALLE BANK**

64. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of LaSalle Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

65. Attached as Exhibit 26 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of LaSalle Bank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 27 - LEHMAN BROTHERS**

66. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Lehman Brothers and/or certain of its affiliated entities pursuant to an agreement between the parties.

67. Attached as Exhibit 27 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Lehman Brothers (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 28 - LEX SPECIAL ASSETS**

68. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Lex Special Assets and/or certain of its affiliated entities pursuant to an agreement between the parties.

69. Attached as Exhibit 28 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Lex Special Assets (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 29 - MERS<sup>4</sup>**

70. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of MERS and/or certain of its affiliated entities pursuant to an agreement between the parties.

71. Attached as Exhibit 29 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of MERS (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 30 - METMOR FINANCIAL**

72. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Metmor Financial and/or certain of its affiliated entities pursuant to an agreement between the parties.

73. Attached as Exhibit 30 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of

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<sup>4</sup> JPMC no longer causes foreclosure actions to be brought in the name of MERS.

Metmor Financial (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

#### **COUNT 31 - NORTH FORK BANK**

74. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of North Fork Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

75. Attached as Exhibit 31 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of North Fork Bank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

#### **COUNT 32 - PNC BANK**

76. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of PNC Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

77. Attached as Exhibit 32 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of PNC Bank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 33 - RAYMOND JAMES BANK**

78. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Raymond James Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

79. Attached as Exhibit 33 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Raymond James Bank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 34 - SOVEREIGN BANK**

80. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Sovereign Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

81. Attached as Exhibit 34 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Sovereign Bank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 35 - STERLING HOME MORTGAGE**

82. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Sterling Home Mortgage and/or certain of its affiliated entities pursuant to an agreement between the parties.

83. Attached as Exhibit 35 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of

Sterling Home Mortgage (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

#### **COUNT 36 - SUNSET MORTGAGE**

84. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Sunset Mortgage and/or certain of its affiliated entities pursuant to an agreement between the parties.

85. Attached as Exhibit 36 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Sunset Mortgage (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

#### **COUNT 37 - TD BANK**

86. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of TD Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

87. Attached as Exhibit 37 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of TD Bank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 38 - THE BANK OF NEW YORK**

88. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of The Bank of New York and/or certain of its affiliated entities pursuant to an agreement between the parties.

89. Attached as Exhibit 38 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of The Bank of New York (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 39 - U.S. BANK**

90. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of U.S. Bank and/or certain of its affiliated entities pursuant to an agreement between the parties.

91. Attached as Exhibit 39 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of U.S. Bank (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 40 - UNION FEDERAL MORTGAGE CORP.**

92. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Union Federal Mortgage Corp. and/or certain of its affiliated entities pursuant to an agreement between the parties.

93. Attached as Exhibit 40 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Union

Federal Mortgage Corp. (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 41 - UNITED MORTGAGE CORP.**

94. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of United Mortgage Corp. and/or certain of its affiliated entities pursuant to an agreement between the parties.

95. Attached as Exhibit 41 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of United Mortgage Corp. (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**COUNT 42 - WACHOVIA**

96. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Wachovia and/or certain of its affiliated entities pursuant to an agreement between the parties.

97. Attached as Exhibit 42 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Wachovia (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 43 - WASHINGTON MUTUAL**

98. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Washington Mutual and/or certain of its affiliated entities pursuant to an agreement between the parties.

99. Attached as Exhibit 43 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Washington Mutual (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 44 - WASHINGTON MUTUAL SPECIALTY**

100. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Washington Mutual Specialty and/or certain of its affiliated entities pursuant to an agreement between the parties.

101. Attached as Exhibit 44 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Washington Mutual Specialty (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

### **COUNT 45 - WELLS FARGO**

102. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Wells Fargo and/or certain of its affiliated entities pursuant to an agreement between the parties.

103. Attached as Exhibit 45 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Wells

Fargo (or its affiliated entities) and in which JPMC previously served a NOI that did not include the name and address of the lender and/or for which JPMC may lack sufficient evidence of mailing.

**WHEREFORE**, Plaintiff respectfully requests that this Court enter an Order permitting JPMC to issue corrected NOIs in an omnibus manner as permitted in the April 4, 2012 Order to include the name and address of the lender in the pending, uncontested foreclosure cases listed on the Corrected NOI List and for such other and further relief as this Court deems just and equitable.

MORGAN, LEWIS & BOCKIUS LLP



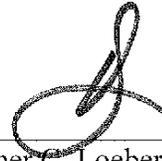
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Christopher C. Loeber, Esq.  
Brian A. Herman, Esq. (to be admitted pro hac vice)  
Michele A. Coffey, Esq. (to be admitted pro hac vice)

Dated: 9-26-12

**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 proceeding contemplated, other than the pending foreclosure actions on the Corrected NOI List attached hereto and any pending, 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.



---

Christopher C. Loeber, Esq.

Dated: **9-26-12**

VERIFICATION

STATE OF **Ohio** :  
:  
COUNTY OF **Franklin** :

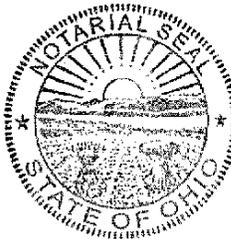
I, Joseph F. Krupa, Jr., being duly sworn states:

1. I am Vice President of JPMorgan Chase Bank, N.A. for JPMC, the applicant named in the foregoing Verified Complaint.
2. The factual allegations in the Verified Complaint are true to the best of my knowledge and belief.
3. The Exhibits attached to the Verified Complaint are true and correct copies.

Name:  Date: 9/26/2012  
Joseph F. Krupa, Jr.  
Vice President

Sworn and subscribed before me  
This 26 day of September, 2012

  
Jennifer E Blattler



JENNIFER E BLATTLER  
Notary Public, State of Ohio  
My Commission Expires 03-23-2016

# EXHIBIT A

Chase (FL5-7734)  
P.O. Box 44090  
Jacksonville, FL 32231-4090



{Current Date}

CERTIFIED MAIL: Return Receipt Requested and First Class Mail

{Mortgagor1}  
{Mortgagor2}  
{Mortgagor3}  
{Mailing Address 1}  
{Mailing Address 2}  
{Mailing City, State ZIP}

Re: Order to Show Cause - [Caption]  
Borrower Name: {Mortgagor1}  
{Mortgagor2}  
{Mortgagor3}  
Loan Number: {Loan Number}  
Plaintiff Name in Foreclosure action: {Plaintiff Name}  
Docket Number in Foreclosure action: {Docket :}

Dear {Mortgagor 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 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 and/or JPMorgan Chase Bank, N.A. ("Chase"), the servicer of your loan, may lack sufficient information to adequately confirm mailing of the original Notice of Intention to Foreclose.

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. Paul Innes, P.J.Ch., Mercer Vicinage or Hon. Margaret Mary McVeigh, P.J.Ch., Passaic Vicinage], gave permission to Chase to serve, along with the Order to Show Cause, corrected Notices of Intention to Foreclose on all defendant mortgagors/parties obligated on the debt in pending foreclosure actions filed before February 28, 2012.

The docket number for your foreclosure action may be found in the subject line of this letter.

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

Enclosed with this letter is a copy of the Order to Show Cause and a copy of the verified complaint filed with the Order to Show Cause. The verified complaint lists the following lenders in the following counts of the verified complaint:

1. Advanta Mortgage Corp.
2. Ahmanson Obligation Co.
3. BAC Home Loans
4. Bank of America
5. Capital One
6. Capital Financial Mortgage Corp.
7. Citibank
8. Columbia Bank
9. Commerce Bancorp
10. Countrywide
11. CTX
12. Deutsche Bank
13. Dollar Bank
14. Dynamic Financial
15. Eastern American
16. EMC
17. FHLMC
18. First Horizon
19. FNMA
20. GNMA
21. Homesales, Inc.
22. HSBC
23. Hudson City
24. Investor Savings Bank
25. JP Morgan Chase Bank, N.A.
26. LaSalle Bank
27. Lehman Brothers
28. Lex Special Assets
29. MERS
30. Metmor Financial
31. North Fork Bank
32. PNC Bank
33. Raymond James Bank
34. Sovereign Bank
35. Sterling Home Mortgage
36. Sunset Mortgage
37. TD Bank
38. The Bank of New York
39. U.S. Bank
40. Union Federal Mortgage Corp.
41. United Mortgage Corp.
42. Wachovia
43. Washington Mutual
44. Washington Mutual Specialty

## 45. Wells Fargo

The verified complaint sent to you does not include the attachments. The verified complaint with attachments, which list the foreclosure actions in which the above-named lenders are the plaintiffs, will be made available on the New Jersey Courts web site at <http://www.judiciary.state.nj.us/>.

### **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 35 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:

Overnight/Regular Mail:      Bruno Mejia  
Chase  
Attention: Collections Department  
Mail Code: OH4-7356  
3415 Vision Drive  
Columbus, OH 43219-6009

Phone:                              800-848-9380

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. The docket number for your foreclosure action may be found in the subject line of this letter.

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, Christopher C. Loeber, Esq., at Morgan, Lewis & Bockius LLP, 502 Carnegie Center, Princeton, NJ 08540-6241, and mail a copy of the objection to [Judge Innes or Judge McVeigh] at [address].

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](mailto:SCCOForeclosure.Mailbox@judiciary.state.nj.us).

If you are represented by an attorney in your foreclosure case, you should notify him or her that you received these papers. These papers are not being sent directly to your attorney if you have one.

If you cannot afford an attorney, you may apply for free legal assistance online at [www.lsnjlaw.org](http://www.lsnjlaw.org) or call the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529) or call the Legal Services office in the county where you live. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is attached.

Enclosures

- Copy of the Order to Show Cause
- Copy of the Verified Complaint
- Corrected Notice of Intention to Foreclose
- Directory for Local Services Offices and Lawyer Referral Services

# EXHIBIT B

Chase (FL5-7734)  
P.O. Box 44090  
Jacksonville, FL 32231-4090



{Current Date}

{Mortgagor1}  
{Mortgagor2}  
{Mortgagor3}  
{Mailing Address 1}  
{Mailing Address 2}  
{Mailing City, State ZIP}

### Notice of Intent to Foreclose

Account: {Loan Number} (the "Loan")  
Property Address: {Property Address}  
[If Unit]{Unit {UNIT ID}}  
{Property City, State ZIP} (the "Property")

Dear {Mortgagor Name(s)}:

Our records show that your Loan is in default and you have breached the terms of the Mortgage or Deed of Trust ("Security Instrument") securing your Loan.

Under the terms of the Security Instrument, JPMorgan Chase Bank, N.A. ("Chase") hereby notifies you of the following:

1. You are in default because you have failed to pay the required monthly installments commencing with the payment due {First Due Date}.
2. As of {Current Date}, Total Monthly Payments (including principal, interest, and escrow if applicable) due under the terms of your loan documents in the total amount of \${Total Mthly Payments} are past due.

Amount Held in Suspense \${Susp Amt}

You are also responsible for paying any amounts that become due from the date of this letter through the expiration date set forth in Paragraph 3 below. These amounts may include, but are not limited to, taxes and insurance as permitted by applicable law. If you have any questions about the total amount due, please call us as soon as possible at 800-848-9380.

3. You have the right to cure the default on or before {Current Date + 35} to prevent Chase from resuming the foreclosure proceedings.
4. Action required to cure the default: You must pay the Total Monthly Payments listed in

Paragraph 2, minus the Amount Held in Suspense, if any, on or before {Current Date + 35}, in order to cure this default. If you have any questions about the total amount due, please call us as soon as possible at 800-848-9380.

5. If you fail to cure the default on or before {Current Date + 35}, Chase may take steps to terminate your ownership in the Property by resuming the foreclosure suit concerning the loan, in a court of competent jurisdiction, all without further notice to you. If this happens, Chase will be entitled to collect its expenses incurred in pursuing the remedies provided in the Security Instrument, which may include, but not be limited to, allowable foreclosure/attorney fees, and other expenses permitted by applicable law, in an amount not to exceed that amount permitted by the Rules Governing the Courts of the State of New Jersey.
6. If permitted by your loan documents or applicable law, you have the right to reinstate after acceleration of the Loan and the right to assert in the foreclosure proceeding the nonexistence of a default, or any other defense to acceleration, foreclosure, and sale. In the event we resume the foreclosure proceeding against you, you will still have a right to cure the default prior to entry of the foreclosure judgment pursuant to Section 5 of the Fair Foreclosure Act; however, you will be responsible for our 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.
7. In the event that you transfer the Property to another person, the transfer is subject to our rights under the Security Instrument. The new owner of the Property may have the right to cure the default as provided in the Fair Foreclosure Act.
8. You are advised to seek counsel from an attorney of your own choosing concerning this 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 Property 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.
9. You are advised of the possible availability of financial assistance for curing a default from programs operated by the State or Federal government or nonprofit organizations, if any, as identified by the Commissioner of Banking and Insurance. A list of such programs issued by the Commissioner is attached.
10. Please note that JPMorgan Chase Bank, N.A. is [GSE/Bank-Owned Variable]{both} the mortgage servicer [GSE/Bank-Owned Variable]{and lender} for your Loan. The address for your servicer {and lender} is listed below. If you disagree with our assertion that a default has occurred or the correctness of our calculation of the amount required to cure the default, or you have any questions regarding the remittance instructions below, you can contact Bruno Mejia at:

Overnight/Regular Mail: Chase  
 Attention: Collections Department  
 Mail Code: OI14-7356  
 3415 Vision Drive  
 Columbus, OH 43219-6009

Phone: 800-848-9380

[NON-GSE/NON-/Bank-Owned Variable]{We service your Loan on behalf of the lender, {Mortgagee Name}. The address for your lender is:

Overnight/Regular Mail: {Mortgagee Address 1}  
 {Mortgagee Address 2}  
 {Mortgagee City, State ZIP}}

11. Kindly remit the total amount due, shown in Paragraph 2 above, to the remittance address listed below. Please note that Chase policy requires certified funds if two insufficient funds (NSF) payments have been received in the last six months. In this event, Chase will not accept a Direct Check, FastPay or SpeedPay. Payments cannot be made at Chase retail bank branches. Please refer to the address below for payment information or call us if you have any questions.

Regular Mail:                      Attention: Mortgage Cash Operations Department (OH4-7216)  
P.O. Box 182626  
Columbus, OH 43219

Overnight Mail:                    Attention: Mortgage Cash Operations Department (OH4-7216)  
3415 Vision Drive  
Columbus, OH 43219

Except as required by law, we are under no obligation to accept less than the full amount owed. If you send us less than the full amount owed, we may in our sole discretion apply such partial payment to your Loan without waiving any default or waiving our right to accelerate the Loan and continue with foreclosure proceedings in accordance with Paragraph 5 above.

12. If you are unable to pay the amount past due, Chase has a variety of homeowner assistance programs that might help you resolve your default and keep your home; however, we need to talk with you to discuss these options and determine which of them might be appropriate for your circumstances. Please call us as soon as possible at 800-848-9380.
13. While the Loan remains in default, we will perform certain tasks to protect our interest in the Property, including visits to your Property at regular intervals during the default. This will be done to determine, as of the date of the inspection, the property condition, occupancy status, and possibly your plans for curing the default and paying this Loan on time. You should anticipate that any costs incurred by Chase will be added to the amount you now owe if permitted by your loan documents or applicable law.

Sincerely,

Chase  
800-848-9380  
800-582-0542 TDD / Text Telephone  
[www.chase.com](http://www.chase.com)

Enclosures

- Federal Trade Commission Pamphlet
- List of Entities Providing Assistance: New Jersey

CERTIFIED MAIL: Return Receipt Requested and First Class Mail

### **IMPORTANT NOTICE TO SERVICEMEMBERS AND THEIR DEPENDENTS**

If you are or recently were on active duty or active service, you may be eligible for benefits and protections under the federal Servicemembers Civil Relief Act (SCRA). This includes protection from foreclosure or eviction. You may also be eligible for benefits and protections under state law. SCRA and state Military benefits and protections also may be available if you are the dependent of an eligible Servicemember.

Eligible service may include:

- Active duty with the Army, Navy, Air Force, Marine Corps, or Coast Guard, or
- Active service as a commissioned officer of the National Oceanic and Atmospheric Administration, or
- Active service as a commissioned officer of the Public Health Service, or
- Service with the forces of a nation with which the United States is allied in a war or Military action, or
- Service with the National Guard of a state militia under a state call of duty, or
- Any period when you are absent from duty because of sickness, wounds, leave, or other lawful cause.

For more information, please call Chase Military Services at 877-469-0110.

### **AN IMPORTANT REMINDER FOR ALL OUR CUSTOMERS**

As stated in the "Questions and Answers for Borrowers about the Homeowner Affordability and Stability Plan" distributed by the Obama Administration, "Borrowers should beware of any organization that attempts to charge a fee for housing counseling or modification of a delinquent loan, especially if they require a fee in advance." Loan modification scams should be reported to [PreventLoanScams.org](http://PreventLoanScams.org) or by calling 888-995-HOPE; 888-995-4673. We offer loan modification assistance free of charge (i.e., no modification fee required). Please call us immediately at 866-550-5705 to discuss your options. The longer you delay, the fewer options you may have.

**We are attempting to collect a debt, and any information obtained will be used for that purpose.**

**If you are represented by an attorney, please refer this letter to your attorney and provide us with the attorney's name, address, and telephone number.**

**To the extent your original obligation was discharged, or is subject to an automatic stay of bankruptcy under Title 11 of the United States Code, this notice is for compliance and/or informational purposes only and does not constitute an attempt to collect a debt or to impose personal liability for such obligation. However, a secured party retains rights under its Security Instrument, including the right to foreclose its lien.**

## List of Entities Providing Assistance–New Jersey

AGENCY NAME	PHONE	ADDRESS	CITY	ZIP
American Credit Alliance, Inc	609-393-5400	26 S. Warren Street	Trenton	08608
Atlantic Human Resources, Inc	609-348-4131	1 S. New York Avenue	Atlantic City	08401
CCCS of Central New Jersey	609-586-2574	1931 Nottingham Way	Hamilton	08619
CCCS of New Jersey	973-267-4324	185 Ridgedale Avenue	Cedar Knolls	07927
Fair Housing Council of Northern New Jersey	201-489-3552	131 Main Street	Hackensack	07601
Garden State Consumer Credit Counseling, Inc	800-992-4557	225 Willowbrook Road	Freehold	07728
Jersey Counseling & Housing Development, Inc	856-227-3683	29 S Black Horse Pike	Blackwood	08012
Jersey Counseling & Housing Development, Inc	856-541-1000	1840 S Broadway	Camden	08104
Mercer County Hispanic Association	609-392-2446	200 E. State Street, 2 <sup>nd</sup> Floor	Trenton	08607
Middlesex County Economic Opportunities Corp	732-790-3344	1215 Livingston Avenue	North Brunswick	08902
Monmouth County Human Services	732-431-7998	Housing Services Unit P.O. Box 3000	Freehold	07728
New Jersey Citizen Action (Main Office)	973-643-8800	744 Broad Street, Suite 2080	Newark	07102
New Jersey Citizen Action (Central Jersey)	732-246-4772	85 Raritan Avenue, Suite 100	Highland Park	08904
New Jersey Citizen Action (South Jersey)	856-966-3091	2 Riverside Drive, Suite 362	Camden	08103
Ocean Community Economic Action Now, Inc	732-244-2351Ext. 2	22 Hyers Street	Toms River	08753
Paterson Coalition for Housing, Inc	973-684-5998	262 Main Street, 5 <sup>th</sup> Floor	Paterson	07505
Paterson Task Force for Community Action, Inc	973-279-2333	155 Ellison Street	Paterson	07505
Puerto Rican Action Board (Housing Coalition Unit)	732-249-9700	90 Jersey Avenue	New Brunswick	08901
Tri-County Community Action Agency	856-451-6330	110 Cohansey Street	Bridgeton	08302
Urban League for Bergen County	201-568-4988	106 W. Palisade Avenue	Englewood	07631
Urban League for Essex County	973-624-9535	508 Central Avenue	Newark	07101
Urban League of Union County	908-351-7200	288 N Broad Street	Elizabeth	07208
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.