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**Attorneys for JPMorgan Chase Bank, N.A.**

**IN RE APPLICATION BY JPMORGAN  
CHASE BANK, N.A. TO ISSUE  
CORRECTED NOTICES OF INTENT TO  
FORECLOSE ON BEHALF OF  
IDENTIFIED FORECLOSURE  
PLAINTIFFS IN UNCONTESTED CASES**

**SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
PASSAIC COUNTY  
DOCKET NO: F-21218-12**

**Civil Action**

**CERTIFICATION OF  
CHRISTOPHER C. LOEBER**

Christopher C. Loeber, of full age, hereby certifies as follows:

1. I am a partner with the law firm of Morgan, Lewis & Bockius LLP, counsel for JPMorgan Chase Bank, N.A. ("JPMC") authorized to act on behalf of Foreclosure Plaintiffs in pending foreclosure cases in New Jersey. I submit this certification in support of our Notice of Motion to Withdraw Without Prejudice the September 26, 2012 Verified Complaint filed by JPMC in connection with the October 1, 2012 Order to Show Cause ("September 26, 2012") Verified Complaint (Exhibit A).

2. As we have previously advised the Court, JPMC experienced technical issues in populating the corrected Notices of Intention to Foreclose described in the October 1, 2012 Order to Show Cause. JPMC has resolved those issues and, on January 29, 2013 under Docket No 002979-13, JPMC filed the first of its new Orders to Show Cause.

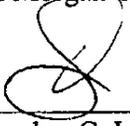


3. In consideration of the January 29, 2013 filing, the Court Clerk has requested that JPMC withdrawal, without prejudice, the September 26, 2012 Verified Complaint.

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

February 15, 2013

MORGAN, LEWIS & BOCKIUS LLP  
Attorneys for JPMorgan Chase Bank, N.A.

By:   
Christopher C. Loeber

# EXHIBIT A



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
- e. 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 Homesaes, 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 Homcsales, 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**

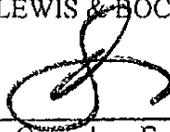
102. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of Wells Fargo and/or certain of its affiliated entities pursuant to an agreement between the parties

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



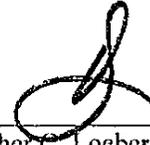
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Christopher C. Loeber, Esq.  
Brian A. Herman, Esq. (to be admitted pro hac vice)  
Michele A. Coffey, Esq. (to be admitted pro hac vice)

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.



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Christopher C. Loeber, Esq.

Dated: **9-26-12**



**MORGAN, LEWIS & BOCKIUS LLP**  
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**502 Carnegie Center**  
**Princeton, New Jersey 08540**  
**609.919.6600**  
**Attorneys for JPMorgan Chase Bank, N.A.**

**IN RE APPLICATION BY JPMORGAN  
CHASE BANK, N.A. TO ISSUE  
CORRECTED NOTICES OF INTENT TO  
FORECLOSE ON BEHALF OF  
IDENTIFIED FORECLOSURE  
PLAINTIFFS IN UNCONTESTED CASES**

**SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION  
PASSAIC COUNTY  
DOCKET NO: F-21218-12**

Civil Action

**ORDER**

THIS MATTER having been opened to the Court by Morgan, Lewis & Bockius LLP, attorneys for JPMorgan Chase Bank, N.A. ("JPMC"), and the Court having considered and good cause having been shown,

IT IS on this \_\_\_\_\_ day of \_\_\_\_\_, 2013,

ORDERED that the Notice of Motion to Withdraw Without Prejudice JPMC's Verified Complaint filed on September 26, 2012 in connection with the October 1, 2012 OSC is hereby GRANTED.

\_\_\_\_\_  
J.