

CAMELLA HAWSE Paul ANDERSON  
(Your Name(s))

34 N. Willow St Montclair NJ 07042  
(Your Mailing Address)

973509-8375  
(Your Daytime Telephone Number)

Superior Court of New Jersey  
Chancery Division  
General Equity

JP Morgan Chase Bank, NA  
(Name of company or bank that filed the foreclosure complaint)

Essex County  
County where the property is located or "Mercer" for an objection to the Order to Show Cause

Plaintiff(s),

Docket No F- 21511-13

Vs.

CIVIL ACTION

OBJECTION TO: (select one)

Paul Anderson  
(Name of first defendant listed on the complaint)  
Defendant(s),

- Order to Show Cause
- Corrected Notice of Intention to Foreclose

I/We CAMELLA HAWSE & Paul Anderson, the defendant(s) in the foreclosure matter  
(filing party or parties)

21511-13 hereby object  
(caption and docket number if different from above)

to the Plaintiff's filing of the (select one)

- Order to Show Cause
  - Corrected Notice of Intention to Foreclose
- for the following specific reasons:  
(Describe specific objections in numbered paragraphs. Please attach additional pages if necessary.)

objection: Chase did not compl properly serve the unidentified homeowners.

objection: Bank List on Intent to Foreclose does not match MERS. See attached MERS servicer ID Dated 9 September 2013 7:31pm Exhibit A

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

9-11-2013  
Date

Paul Anderson  
Signature  
Paul ANDERSON  
Print or Type Name

RECEIVED

SEP 16 2013

SUPERIOR COURT  
CLERK'S OFFICE

Exhibit A.

<http://www.mers-servicerid.org>



[www.mers-servicerid.org](http://www.mers-servicerid.org)

Process Loans, Not Paperwork™

**1 record matched your search:**

MIN: 1000138-0088812714-5 Note Date: 01/11/2006

MIN Status: Active

Servicer: Ocwen Loan Servicing LLC  
West Palm Beach, FL

Phone: (800) 766-4622

If you are a borrower on this loan, you can [click here](#) to enter additional information and display the Investor name.

[Return to Search](#)

For more information about Mortgage Electronic Registration Systems, Inc. (MERS) please go to [www.mersinc.org](http://www.mersinc.org)

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Chase (FL5-5110)  
P.O. Box 44120  
Jacksonville, FL 32231-4120



July 25, 2013



00001770 HDLO JD 20613 -6W377  
CAMILLA HAWSE  
60 PLEASANT AVE  
MONTCLAIR, NJ 07042



RECEIVED

SEP 16 2013

SUPERIOR COURT  
CLERK'S OFFICE

**Notice!**  
Do not discard!

Chase  
PO BOX 469030  
GLENDALE, CO 80246-9030

When returning your  
mail documents be sure  
this address shows through  
the return envelope.

\*\*\*\*\* **NOTICE! DO NOT DISCARD!** \*\*\*\*\*

Chase (FL5-5110)  
P.O. Box 44120  
Jacksonville, FL 32231-4120



July 25, 2013

CERTIFIED MAIL: Return Receipt Requested and First Class Mail



00001770 HDL0 JD 20613 -BW377

CAMILLA HAWSE  
60 PLEASANT AVE  
MONTCLAIR, NJ 07042



Re: Order to Show Cause: In re Application by JPMorgan Chase Bank, N.A., to Issue Corrected Notices of Intent to Foreclose on Behalf of Identified Foreclosure Plaintiffs in Certain Uncontested Cases (Superior Court of New Jersey, Chancery Division, Passaic County, Docket No.: F-21511-13)

Borrower Name: CAMILLA HAWSE  
Loan Number: 5303513765  
Plaintiff Name in Foreclosure action: JPMorgan Chase Bank, National Association  
Docket Number in Foreclosure action: F-13956-09

Dear CAMILLA HAWSE:

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 June 28, 2013, and in compliance with the Supreme Court's opinion in *U.S. Bank N.A. v. Guillaume*, 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:

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 on or before September 16, 2013 at the following address:

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, at Morgan, Lewis & Bockius LLP, 502 Carnegie Center, Princeton, NJ 08540-6241 (Attention: JPMorgan Chase Order to Show Cause), and mail a copy of the objection to Judge McVeigh at:

The Superior Court of New Jersey, Passaic County Courthouse  
71 Hamilton Street  
Chambers 100  
Paterson, New Jersey 07505

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 1-609-421-6100, 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
- Directory for Local Services Offices and Lawyer Referral Services



F I L E D

MORGAN, LEWIS & BOCKIUS LLP  
(A Pennsylvania Limited Liability Partnership)  
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1701 Market Street  
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Brian A. Herman, Esq. (to be admitted pro hac vice)  
101 Park Avenue  
New York, NY 10178  
Tel. (212) 309-6000

Attorneys for JPMorgan Chase Bank, N.A.

	)	SUPERIOR COURT OF NEW JERSEY
	)	CHANCERY DIVISION
IN RE APPLICATION BY JPMORGAN	)	PASSAIC COUNTY
CHASE BANK, N.A. TO ISSUE	)	
CORRECTED NOTICES OF	)	DOCKET NO.: F- 21511-13
INTENTION TO FORECLOSE ON	)	
BEHALF OF IDENTIFIED	)	<u>CIVIL ACTION</u>
FORECLOSURE PLAINTIFFS IN	)	
CERTAIN UNCONTESTED CASES	)	ORDER TO SHOW CAUSE
	)	
	)	

THIS MATTER being brought before the Court by Morgan Lewis & Bockius LLP, attorneys for JPMorgan Chase Bank, N.A. ("JPMC"), authorized to act on behalf of Foreclosure Plaintiffs in pending foreclosure cases in New Jersey, seeking relief by way of summary action for an Order permitting JPMC to issue corrected Notices of Intention to Foreclose ("NOI") to the defendant mortgagor and/or parties obligated on the debt ("Foreclosure Defendants") in the pending, pre-judgment, uncontested foreclosure cases listed on the Exhibits 1 through 25 to the Verified Complaint ("Corrected NOI List - Group 2"), and based upon the New Jersey Supreme Court's decision in US Bank, N.A. v. Guillaume, 209 N.J. 449 (2012), the implementing Order of the New Jersey Supreme Court dated April 4, 2012, and for good cause shown;



Package”), via certified mail, return receipt requested and regular mail at the last known address of the Foreclosure Defendant. The OSC Package shall be mailed within 45 days from the date of this Order. For purposes of this Order to Show Cause, JPMC may serve each marital couple residing at the same address with one OSC Package via certified mail and regular mail.<sup>1</sup>

4. A copy of JPMC’s complete application to this Court shall be loaded onto the New Jersey Courts website within 5 days of the date of this Order where it will be available for review by the general public at the website link -- <http://www.judiciary.state.nj.us/>.

5. In addition to providing service of the OSC Package by certified and regular mail, JPMC will, within 2 days prior to August 28, 2013, provide publication notice two (2) times in each of the following four (4) daily newspapers in a manner consistent with similar legal notices: the Star-Ledger, Bergen County Record, Press of Atlantic City and the Courier Post. Attached hereto as Exhibit A is a sample legal notice.

6. JPMC shall file with the Court its proof of service of the OSC Package on Foreclosure Defendants on the Corrected NOI List – Group 2 in the manner consistent with this Order no later than nine (9) days before the return date.

7. You [Foreclosure Defendants] have the right to object in this proceeding to this Order to Show Cause (the process by which this Court gave JPMC permission to serve the corrected NOI). You must file an original copy of the written objection under the docket number listed on the first page of this Order for this case with Superior Court Clerk’s office, Foreclosure Processing Services in Trenton, New Jersey and you must serve copies of the objection to both the Honorable Margaret Mary McVeigh and counsel for JPMC. To do so, you must set forth

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<sup>1</sup> In the event JPMC has been provided an address for the estate of a deceased Foreclosure Defendant, the OSC Package shall be mailed to the address of the estate and/or the executor or administrator, if known and available.





9. JPMC may file and serve any written reply to any opposition papers received by September 26, 2013. The reply papers must be filed with the Clerk of the Superior Court in Mercer County, with a copy to Judge McVeigh and to each Foreclosure Defendant who filed an opposition.

10. If you cannot afford an attorney, you may call the Legal Services office in the county in which you live. A list of these offices is provided with the corrected NOI.

11. A proposed form of order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court by JPMC no later than nine (9) days before the return date.

12. The Court will entertain argument, but not testimony, on the return date of the Order to Show Cause.

13. In the event a foreclosure action has been suspended or stayed as a result of a bankruptcy filing or loss mitigation activity, the OSC Package shall not be sent unless and until the suspension or stay is lifted. In such circumstances, the following procedure shall be used. JPMC shall mail the OSC Package within 45 days of the lifting of the stay or suspension of the foreclosure action. You [Foreclosure Defendants] will have 35 days from the date of the corrected NOI in which to object to the corrected NOI or cure your default. Any objections to the relief set forth in this Order to Show Cause shall be made in writing to the Court in the County in which your foreclosure action is pending. You must also send a copy of your written papers to JPMC's attorneys at Morgan, Lewis & Bockius LLP, 502 Carnegie Center, Princeton, NJ 08540-6241 (Attention JPMorgan Chase Order to Show Cause) or the Court handling your foreclosure action will not be able to consider your objection.

  
J.S.C.

**MORGAN, LEWIS & BOCKIUS LLP**  
(A Pennsylvania Limited Liability Partnership)  
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101 Park Avenue  
New York, NY 10178  
Tel. (212) 309-6000

Attorneys for JPMorgan Chase Bank, N.A.

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

) SUPERIOR COURT OF NEW JERSEY  
) CHANCERY DIVISION  
) PASSAIC COUNTY

) DOCKET NO.: F-021511-13

) CIVIL ACTION

) VERIFIED COMPLAINT IN SUPPORT  
) OF SUMMARY ACTION

JPMorgan Chase Bank, N.A., ("JPMC"), on behalf of itself and authorized to act on behalf of the plaintiffs in certain 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.



5. One of the duties of a servicer on a defaulted mortgage loan in New Jersey is to prepare and serve the Notice of Intention 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,



11. The Corrected NOI List -- Group 2 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; and (6) the name of the foreclosure attorney.<sup>4</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 on the corrected NOI List submitted with this application. 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.

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<sup>4</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.



### **COUNT 3 - CITIBANK**

18. 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.

19. Attached as Exhibit 3 is a list of certain 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 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 4 - COLUMBIA BANK**

20. 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.

21. Attached as Exhibit 4 is a list of certain 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 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 5 - COMMERCE BANK**

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

23. Attached as Exhibit 5 is a list of certain of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Commerce Bank (or its affiliates) in which JPMC previously served a NOI that did not



### **COUNT 8 - EMC**

28. 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.

29. Attached as Exhibit 8 is a list of certain 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 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 9 - FEDERAL HOME LOAN MORTGAGE CORPORATION**

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

31. Attached as Exhibit 9 is a list of certain of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Federal Home Loan Mortgage Corporation (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 10 - FIRST HORIZON**

32. 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.

33. Attached as Exhibit 10 is a list of certain 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 affiliates) in which JPMC previously served a NOI that did not include



39. Attached as Exhibit 13 is a list of certain 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 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 - JPMORGAN CHASE BANK, N.A.**

40. JPMC services residential mortgage loans in New Jersey where the foreclosure action was brought in the name of JPMorgan Chase Bank, N.A. and/or certain of its affiliated entities pursuant to an agreement between the parties.

41. Attached as Exhibit 14 is a list of certain of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of JPMorgan Chase Bank, N.A. (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 15 - LASALLE BANK**

42. 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.

43. Attached as Exhibit 15 is a list of certain 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 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.



of PNC 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 19 - RAYMOND JAMES BANK**

50. 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.

51. Attached as Exhibit 19 is a list of certain 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 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 20 - SOVEREIGN BANK**

52. 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.

53. Attached as Exhibit 20 is a list of certain 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 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 21 - TD BANK**

54. 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.



## COUNT 24 - WASHINGTON MUTUAL

60. 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.

61. Attached as Exhibit 24 is a list of certain 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 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 25 - WELLS FARGO

62. 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.

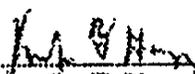
63. Attached as Exhibit 25 is a list of certain of the pending, uncontested foreclosures in New Jersey that are being serviced by JPMC where the foreclosure was brought in the name of Wells Fargo (or its affiliates) in which JPMC previously served a NOI that did not include the name and address of the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

**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 certain pending, uncontested foreclosure cases listed on the Corrected NOI List – Group 2 and for such other and further relief as this Court deems just and equitable.



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 – Group 2 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.

(S16)  
  
.....  
Kristofor T. Henning, Esq.

Dated: 6/11/2015



## CONTACT FOR LEGAL SERVICES ORGANIZATIONS

### LEGAL SERVICES OF NEW JERSEY - Statewide program serving all counties

You may apply for free legal services on line at: [WWW.LSNJLAW.ORG](http://WWW.LSNJLAW.ORG)  
or call the toll free hotline number at: 1-888-LSNJ-LAW or 1-888-576-5529  
or you may contact the regional Legal Services program in the county where you live.

### REGIONAL LEGAL SERVICES PROGRAMS - Programs serving particular counties

#### 1. LEGAL SERVICES OF NORTHWEST JERSEY - Serving Morris, Somerset, Hunterdon,

##### Sussex and Warren counties

**Hunterdon County**  
82 Park Avenue  
Flemington, NJ 08822  
908-782-7979

**Morris County**  
30 Schuylar Place, 2nd Floor  
Morristown, NJ 07963  
973-285-6911

**Somerset County**  
34 West Main Street, Suite 301  
Somerville, NJ 08876  
908-231-0840

**Sussex County**  
18 Church Street, Suite 120  
Newton, NJ 07860  
973-383-7400

**Warren County**  
91 Front Street  
Belvidere, NJ 07823  
908-475-2010

#### 2. NORTHEAST LEGAL SERVICES - Serving Bergen, Hudson and Passaic counties

**Bergen County Office**  
190 Moore Street  
Hackensack, NJ 07601  
201-487-2166

**Hudson County Office**  
574 Summit Avenue  
Jersey City, NJ 07306  
201-792-6363

**Passaic County Office**  
152 Market Street  
Paterson, NJ 07505  
973-523-2900

#### 3. ESSEX-NEWARK LEGAL SERVICES - Serving Essex County

5 Commerce Street  
Newark, NJ 07102  
973-624-4500

#### 4. CENTRAL JERSEY LEGAL SERVICES - Serving Union, Middlesex and Mercer counties

**Trenton**  
198 West State Street  
Trenton, NJ 08608  
609-695-6249

**New Brunswick**  
317 George Street, Suite 201  
New Brunswick, NJ 08901  
732-249-7600

**Perth Amboy**  
313 State Street, Suite 308  
Perth Amboy, NJ 08861  
732-324-1613

**Elizabeth**  
60 Prince Street  
Elizabeth, NJ 07208  
908-354-4340  
Telephone for the Hearing Impaired:  
908-558-1642

#### 5. OCEAN MONMOUTH LEGAL SERVICES - Serving Ocean and Monmouth counties

Monmouth County: 732-866-0020

Ocean County: 732-341-2727

#### 6. SOUTH JERSEY LEGAL SERVICES - Serving Burlington, Camden, Gloucester, Atlantic, Cape May, Cumberland, and Salem counties

800-496-4570 between 9:00 a.m. and 1:00 p.m.



5. If you fail to cure the default on or before August 29, 2013, 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 both the mortgage servicer 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: OH4-7356  
3415 Vision Drive  
Columbus, OH 43219-6009

Phone: 1-800-848-9380

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  
P.O. Box 182626  
Columbus, OH 43219

Overnight Mail: Attention: Mortgage Cash Operations Department



- 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 1-877-469-0110.

**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." Do not sign over the deed to your property to any organization or individual unless you are working directly with your mortgage company to forgive your debt. Never make a mortgage payment to anyone other than your mortgage company without their approval. Loan modification scams should be reported to [PreventLoanScams.org](http://PreventLoanScams.org) or by calling 1-888-995-HOPE; 1-888-995-4673. We offer loan modification assistance free of charge (i.e., no modification fee required). Please call us immediately at 1-866-550-5705 to discuss your options. The longer you delay, the fewer options you may have.

BW377



Call

**1-888-995-HOPE**

for free personalized guidance from housing counseling agencies certified by the U.S. Department of Housing and Urban Development. The Homeowner's HOPE™ Hotline – open 24/7 – is operated by the Homeownership Preservation Foundation, a nonprofit member of the HOPE NOW Alliance of mortgage industry members and HUD-certified counseling agencies. Or visit

[www.hopenow.com](http://www.hopenow.com)

For free information on the President's plan to help homeowners, visit

[www.makinghomeaffordable.gov](http://www.makinghomeaffordable.gov)



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**MAKING HOME AFFORDABLE.gov**