

Roberto P. Planas, Jr.
(Your Name(s))

P.O. Box 4221, Wayne, NJ 07474
(Your Mailing Address)

(201) 657-6562
(Your Daytime Telephone Number)

Superior Court of New Jersey
Chancery Division
General Equity

Chase Home Finance
(Name of company or bank that filed the foreclosure
complaint)

Plaintiff(s),

Passaic County
County where the property is located or
"Mercer" for an objection to the Order to Show Cause
Docket No F- 21511-13

Vs.

Roberto P. Planas
(Name of first defendant listed on the complaint)

Defendant(s),

CIVIL ACTION

OBJECTION TO: (select one)

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

I/We Roberto P. Planas, Jr., the defendant(s) in the foreclosure matter
(filing party or parties)

F-18683-10 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.)

See 3 page Attachment to Objection...

On behalf of all the named persons on the mortgage note and F-18683-10 Docket, I Roberto P. Planas, Jr., object to OSC and Corrected NOI. I did not receive original NOI and through Chase's confusing information and processes have been trying to work with Chase for 4 years and 10 months attempting to save my home in obtaining the OBAM HAMP and/or a sensible and sustainable modification options...

RECEIVED

SEP 16 2013

SUPERIOR COURT
CLERK'S OFFICE

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.

09/13/2013
Date



Signature
Roberto P. Planas, Jr.

Print or Type Name

Certification of Service

I hereby certify that on 09/13/2013 I sent my objection to the following parties by: (Select which mailing method you chose. If you sent it by both regular and certified mail, check both.

regular mail

certified mail

other: Post office Federal Express-Express Delivery

List each party to the lawsuit; send your opposition to the attorney if the party is represented by counsel; if the party is pro se you may send the papers directly to that individual.

Name Morgan, Lewis & Bockius LLP

Name Judge Margaret M. McVeigh, P.J. Ch.

Address 502 Carnegie Center

Address The Superior Court of NJ, Passaic County

Princeton, NJ 08540-6241

71 Hamilton Street, Chambers 100

Attn: JPMorgan Chase Order to Show Cause

Patterson, New Jersey 07505

Attorney for JPMorgan Chase

Attorney for _____

09/13/2013

Date

Signature

Roberto P. Planas, Jr

Print or Type Name

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SUPERIOR COURT
CLERK'S OFFICE

...Attachment to Objection (s)

On behalf of all the named persons on the mortgage note and F-18683-10 Docket, I Roberto P. Planas, Jr., object to OSC and Corrected NOI. I did not receive original NOI and through Chase's confusing information and processes have been trying to work with Chase for 4 years and 10 months attempting to save my home in obtaining the OBAM HAMP and/or a sensible and sustainable modification options.

1. I have been trying to work with...

- Chase
- JPM Chase
- JPMorgan Chase
- Chase Home Finance
- Chase Home Loans
- Chase Customer Assistance Specialist
- Chase Fulfillment Center
- Chase Executive Specialists
- Or whatever the mortgager wants to call itself...

...for 4 years and 10 months, in multiple attempts at saving my home and avoiding foreclosure. I did not want to lose my home as it's my primary residence and it's the only investment I have left for my children.

2. I have applied to every option and process that Chase (all of the above named) advised. The results were disappointing, frustrating, negative and unsustainable and at times unsubstantiated and without sense. It's a direct reflection of the totally overwhelming, confusing, conflicting, redundant and time consuming process and sheds a very dark cloud of suspicion to an organization that could have helped me save my home but failed. I do not want to lose my home, but I am now at the end of my wits, will and options.

3. The delays, inconsistency, redundancy and confusing information, lack of full disclosure and lack of important specific knowledge of the "Specialists", harassment of multiple letters, calls and delays in the process have really failed with respect to my multiple attempts, in proactively trying to save my home. The Chase organization FAILED me consistently. An organization that with all its powers and authority and resources that was suppose to help me in a cause that would have prolonged benefits for both Chase as the Mortgager and me, the mortgagee/client with regards to my mortgage and HELOC.

4. To add to the confusion and overwhelm, I have been dealing with multiple Chase representatives as listed below:

- Geri Bittner (877-496-3138 @x 3464404)
- Sam/Shan (800-446-8939, 800-848-9380)
- Shaniqua Moore (877-496-9032 @x 3441245, 302-413-3001)

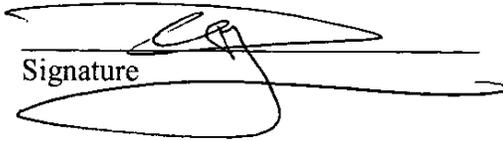
- Tiffany Saunders (88-310-7995 @x 3204143, 800-848-9136)
 - Felecia Haslett (877-496-9032)
 - And other representatives (Ira Nydick, Thomas Holdstein, etc) and miscellaneous phone calls with no voice mail return messages, hangs ups, weird unrecognizable or incomplete messages and unresponsive or dead air from Chase: via caller ID, (800-836-5656, 602-627-9559, 800-848-9380, 614-422-4215, 800-723-3004, 866-550-5705, 813-881-2000, 877-419-6497)
 - There are more names and numbers documented
→I can produce my notes if required.
5. 2008 – I attempted to be proactive in order to pre-empt foreclosure by contacting Chase for assistance, advice and guidance to workout a solution BEFORE my funds were totally exhausted. I was constantly denied.
 6. 2009- I attempted to pay partial mortgage payments with unemployment income and borrowed funds in an attempt to minimize impact to financial arrears amounts. I was instructed by Chase to stop partial payments.
 7. 2009-2012-Multiple attempts at saving my home via OBAMA HAMP with negative, disappointing, unsustainable results due to information and process conflicts, delays. and redundancies.
 8. 2012-2013 – Short Sale process which netted negative results as 6 months passed without an offer or buyer.
 9. Currently to date, as advised by Chase, my last resort and only hope to avoid foreclosure, the Deed in lieu process.
 10. The complexity, delays, redundancy and confusion was overwhelming. I have sent as Chase requested: Proof of income, proof of no income, 4506T forms, Hardship affidavits, bank statements, paystubs, tax information, signed Dodd-Frank Certificates, Notarized letters, divorce decrees, other specific documents requested, etc. I have sent these documents multiple times and have confirmation of sent items with copies of all documents sent.
 11. I also have notes of all my conversations with dates, times and representatives names. If required, these can be used to obtain the recorded conversations with Chase's representatives if required to subpoena the recorded conversations to validate the conflicting at times misleading information I was provided. It will also validate the redundant requests for documents previously sent and show how every representative and systems were not aligned, did not communicate or note previous conversations to effectuate expeditious processing of my requests to help save my home. It will validate where Chase FAILED.

12. I truly believe the total months and dollar amount accumulated in arrears calculated by Chase (as noted in the corrected NOI letter) should be forgiven and the responsibility of Chase as they delayed and halted the foreclose process due to
- Robo signers scandal
 - Federal and State regulators litigation processes
 - Federal and State Investigations of their unethical practices
 - i. Lack of distribution of government funds that are supposed to help homeowners underwater, troubled, and in financial hardship.
 - And this Civil action regarding corrected NOI and OSC
13. The accumulated amount (mortgage, interests, insurance, taxes, penalties, court fees, legal fees and any other charges regarding the foreclosure should be waived and should be Chase's responsibility.
14. I depended on their professional guidance, integrity, attention to detail and disclosure of specific information for which I relied on to help me save my home. They FAILED.

I can provide documents, notes and additional statements if required.

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.

Date 9/13/2013


Signature

Roberto P. Planas, Jr
Print or Type Name