

**REED SMITH LLP**

*Formed in the State of Delaware*

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Attorneys for Franklin Credit Management Corporation

	)	SUPERIOR COURT OF NEW JERSEY
	)	CHANCERY DIVISION
IN RE APPLICATION BY FRANKLIN CREDIT MANAGEMENT CORPORATION TO ISSUE CORRECTED NOTICES OF INTENT TO FORECLOSE ON BEHALF OF IDENTIFIED FORECLOSURE PLAINTIFFS IN UNCONTESTED CASES	)	_____ COUNTY
	)	DOCKET NO.: F- F -022940-12
	)	<u>CIVIL ACTION</u>
	)	VERIFIED COMPLAINT IN SUPPORT OF SUMMARY ACTION
	)	

Franklin Credit Management Corporation ("Franklin Credit"), authorized to act on behalf of the Foreclosure Plaintiffs in pending, pre-judgment uncontested foreclosure actions, 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"). Franklin Credit respectfully states as follows:

1. Franklin Credit is a corporation of the State of Delaware.
2. Franklin Credit services mortgage loans for residential properties in New Jersey.
3. When Franklin Credit 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, Franklin Credit 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, Franklin Credit 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 Franklin Credit's systems of record. In cases in which Franklin Credit 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. Franklin Credit makes this application to the Court pursuant to the authority granted to Franklin Credit as the servicing agent of Foreclosure Plaintiffs in pending foreclosure cases.

4. The identities of the Foreclosure Plaintiffs in the foreclosure cases for which Franklin Credit is seeking to issue corrected Notices of Intent are identified alphabetically in the Counts 1 through 3. Attached as Exhibits 1 through 3 to each of those Counts are the current lists of the pending, uncontested foreclosure cases that require corrected NOIs (collectively referred to hereafter as the "Corrected NOI List").

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 Franklin Credit 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 in which to object or to cure the default.

9. Franklin Credit reviewed its pending foreclosure cases with its counsel to identify those foreclosure cases which will require a corrected NOI because the lender and the lender's address were not included in the previously served NOIs. 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 3 includes the portfolio of

loans that are pre-judgment, uncontested foreclosures that Franklin Credit is servicing and in which deficient NOIs were served by Franklin Credit. Specifically, as directed by the Supreme Court in Guillaume and the April 4, 2012 Order, the Corrected NOI List includes a listing of:

- a. foreclosures that were filed on or before February 27, 2012 and which Franklin Credit is servicing the loans and acting as agent for a Foreclosure Plaintiff,
- b. in which final judgment has not been entered, and
- c. in which Franklin Credit is seeking leave to file a corrected NOI to include the identity of the lender and the lender's address.

11. The Corrected NOI List also identifies (1) the name of the lender on each loan which is listed as the Plaintiff in the foreclosure action, (2) the name of the first named Foreclosure Defendant, (3) the foreclosure docket number and, (4) the vicinage.<sup>1</sup> While Franklin Credit 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 Franklin Credit intends to send to each Foreclosure Defendant. As instructed by 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. the procedure to follow in the event a Foreclosure Defendant wishes to object to the NOI,
- c. identifies the individual(s) a Foreclosure Defendant should contact with any

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<sup>1</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 Franklin Credit will require that foreclosure counsel take appropriate steps to change the plaintiff in affected foreclosure actions where required.

questions, and

- d. advises the Foreclosure Defendant of the right to object to the corrected NOI as well as the right to cure the default within 30 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 Franklin Credit 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 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 – HUNTINGTON NATIONAL BANK**

14. Franklin Credit services residential mortgage loans in New Jersey for Huntington National Bank and some of its affiliates 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 Franklin Credit for Huntington National Bank and in which Franklin Credit previously served a NOI that did not include the name and address of the lender.

#### **COUNT 2 – TRIBECA LENDING CORPORATION**

16. Franklin Credit services residential mortgage loans in New Jersey for Tribeca Lending Corporation and some of its affiliates 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 Franklin Credit for Tribeca Lending Corporation and in which Franklin Credit previously served a NOI that did not include the name and address of the lender.

**COUNT 3 – WELLS FARGO BANK, N.A.**

18. Franklin Credit services residential mortgage loans in New Jersey for Huntingdon National Bank and some of its affiliates pursuant to an agreement between the parties.

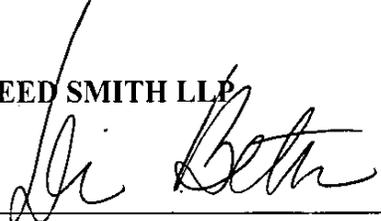
19. Attached as Exhibit 3 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by Franklin Credit for Wells Fargo Bank, N.A. and in which Franklin Credit previously served a NOI that did not include the name and address of the lender.

**COUNT 4 – PENDING BANKRUPTCY MATTERS**

20. Attached as Exhibit 4 is a list of the pending, uncontested foreclosures in New Jersey that are being serviced by Franklin Credit for the lenders identified in Counts 1 through 3 that are currently subject to the Automatic Bankruptcy Stay. It is the intention of Franklin Credit to send corrected NOIs in these matters when permitted by the Bankruptcy Court and in accordance with the instructions of this Court.

**WHEREFORE**, Plaintiff respectfully requests that this Court enter an Order permitting Franklin Credit 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.

REED SMITH LLP

  
\_\_\_\_\_  
Diane A. Bettino, Esquire

Dated:

*10/9/12*

**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.

  
\_\_\_\_\_  
Diane A. Bettino, Esquire

Dated:

*10/9/12*

**VERIFICATION**

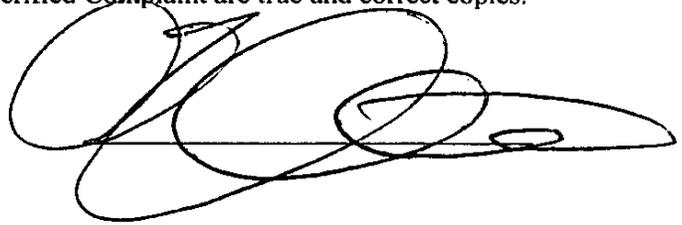
STATE OF New Jersey :  
:  
COUNTY OF Hudson :

I, Melissa Olivera, being duly sworn states:

1. I am Melissa Olivera, Foreclosure Manager for Franklin Credit Management Corporation, the applicant named in the foregoing Verified Complaint.

2. The 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.



Sworn and subscribed before me  
this 28 day of Sept. 2012



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**KAREN LAW**  
**Notary Public, State of New Jersey**  
**No. 2422493**  
**Qualified in Hudson County**  
**My Commission Expires July 6, 2017**

ExA

Form Letter to be Attached to Corrected NOIs Pursuant to an Order to Show Cause

[Letterhead of Franklin Credit Management Corporation]

[Date]

[Defendant Name(s)]

[Defendant Address]

[Defendant City, State ZIP]

Re: Order to Show Cause - [*Caption and Docket Number of Order to Show Cause*]

Dear [Defendant 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.

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 Franklin Credit to serve, along with the Order to Show Cause and verified complaint, corrected Notices of Intention to Foreclose on all defendant mortgagors/parties obligated on the debt in pending foreclosure actions filed before February 28, 2012.

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

Enclosed with this letter is a copy of the Order to Show Cause and the verified complaint (without exhibits). The verified complaint lists the following lenders in the following counts of the verified complaint:

- Count 1 - Huntingdon National Bank
- Count 2 - Tribeca Lending Corporation
- Count 3 - Wells Fargo Bank, N.A.

The attachments to the verified complaint, 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/>. If you are unsure of the docket number for your foreclosure

action, you can access that information on the court's website on the attached exhibits to the verified complaint by entering your name into the automatic search field on the website. If you do not have access to a computer or have trouble locating that information on the Court's website, you can contact Jennifer Lynch, Loss Mitigation Manager at Franklin Credit at (800) 650-7162 who can assist you with locating the information about your foreclosure action.

### **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 30 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 Jennifer Lynch, Loss Mitigation Manager at Franklin Credit at (800) 650-7162. Additional contact information is provided in the corrected Notice of Intention to Foreclose.

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.

### **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.

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, Diane Bettino, Esquire, Reed Smith LLP, Princeton Forrestal Village, 136 Main Street, Princeton, New Jersey 08540, 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).

Ex B

«LFS0\_SYSTEMDATE»

File No. «LFS0\_FILEOPENNO»

*Via Regular Mail and  
Certified Mail, R.R.R. # \_\_\_\_\_*

«LFS0\_LTRTO»

«LFS0\_LTRTOADDRESS»

**Re: Our Client: [Insert Name We Are Foreclosing In The Name Of]  
Loan # [Insert Loan #]  
Property Address: [Insert Property Address]**

**CURE NOTICE OF INTENT TO FORECLOSE UNDER U.S. BANK N.A. v.  
GUILLAUME<sup>1</sup> WHILE FORECLOSURE IS PENDING**

Dear «LFS0\_LTRTOSALUTATIONSUFFIX»:

This firm represents the interests of [Insert name we are foreclosing in the name of], (hereinafter "Lender"), whose address is [Insert address] in the above-referenced matter. On [insert date of Note], you executed a Note which is secured by a mortgage on your property located at [insert property address].

This mortgage is in serious default because you have not made the monthly payments due.

The total amount required to cure this default as of the date of this letter is \$\_\_\_\_\_.

**RIGHT TO CURE**

You may cure your default by paying to lender the amount of \$[insert total amount needed to cure default provided by client] along with any and all monthly payments and associated late charges which may come due prior to [insert 35 days from the date of the letter]. This amount must be received by Lender on or prior to [insert 35-days from date of this letter]. Your payment must be mailed to:

[Insert name we are foreclosing in the name of]<sup>2</sup>

<sup>1</sup> U.S. Bank N.A. v. Guillaume, 2012 LEXIS N.J. 162 (N.J. Feb. 27, 2012)

<sup>2</sup> Note: [insert name of client] is a servicer for loan owner [insert name we are foreclosing in the name of], and authorized to collect loan payments on its behalf.

c/o [Insert name of client, if different then name we are foreclosing]  
Attn: [Insert Contact Person]  
[Insert address]  
[Insert phone number]

Your payment must be in the form of a certified, cashier's check, cash or money order with your account number included thereon. We strongly recommend that you contact the above-referenced representative of your Lender to obtain the most current figures needed to cure your monthly default.

In addition, you must provide proof that all real estate taxes due through the date of this letter have been paid, and any tax sale certificates paid in full.

If you do not cure the default by the above date, the Lender will exercise its right to accelerate the mortgage payments. This means that whatever is owing on the original amount borrowed will be considered due immediately and you may lose the right to pay off the original mortgage in monthly installments.

If you cure the default by [insert 35-days from date of this letter], there will be no requirement to pay attorney's fees and legal costs.

IF YOU DO NOT CURE THE DEFAULT BY [insert 35-days from date of this letter], LENDER MAY PROCEED WITH THE PENDING FORECLOSURE ACTION AGAINST YOU AND TAKE STEPS TO TERMINATE YOUR OWNERSHIP IN THE PROPERTY BY CONTINUING THE FORECLOSURE SUIT IN A COURT OF COMPETENT JURISDICTION.

IN THE EVENT LENDER PROCEEDS WITH THE FORECLOSURE ACTION, YOU WILL STILL HAVE A RIGHT TO CURE THE DEFAULT PRIOR TO THE ENTRY OF THE FORECLOSURE JUDGMENT PURSUANT TO SECTION 5 OF THE NEW JERSEY FAIR FORECLOSURE ACT, HOWEVER, YOU WILL BE RESPONSIBLE FOR LENDER'S COURT COSTS AND ATTORNEYS' FEES IN AN AMOUNT NOT TO EXCEED THAT AMOUNT PERMITTED PURSUANT TO THE RULES GOVERNING THE COURTS OF THE STATE OF NEW JERSEY.

You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to remain in the property. If you continue to live in the property after the Sheriff's Sale, a Writ of Possession will be issued to evict you.

If you cure your default, your mortgage loan will be reinstated. However, if legal action is commenced, and you reinstate, your right to reinstate cannot again be exercised for eighteen (18) months after the date of reinstatement.

In the event you transfer ownership of the property to another person, after Lender has started its foreclosure action, the transfer is still subject to Lender's rights in the mortgage covering the property. The new owner of the property may have the right to cure the default pursuant to the provisions of the New Jersey Fair Foreclosure Act, subject to the provisions of the Mortgage. If the Note and Mortgage provide that a transfer of the property is a default, such a transfer will not stop our foreclosure action.

### **RIGHT TO SEEK LEGAL ADVICE**

You are hereby advised to seek legal advice from an attorney of your own choosing concerning your rights under the mortgage documents and the Fair Foreclosure Act.

If you are unable to afford an attorney, call a Legal Services Office in the county in which the property is located. An individual not eligible for free legal assistance may obtain a referral to an attorney by calling the New Jersey State Bar Association or the Lawyer Referral Service for the county in which the property is located. These numbers are listed on the attached schedule.

### **POSSIBLE FINANCIAL ASSISTANCE**

You are hereby advised that there may be financial assistance available to you to help you cure your default through programs operated by the New Jersey State Government, United States Government and numerous non-profit organizations. You are advised to contact the New Jersey Commissioner of Banking and Insurance at 20 W. State Street, CN 040, Trenton, New Jersey 08625, by calling (609) 292-3420 and inquiring about the programs that may be available to you in order to assist you in curing your default under your mortgage loan. Attached is a schedule listing entities which may provide financial assistance or counseling to borrowers in foreclosure.

### **IF YOU DISAGREE WITH LENDER'S ASSERTION**

If you disagree with the lender's assertion that a default has occurred or the correctness of the lender's calculation of the amount required to cure default, please contact:

[Insert name we are foreclosing in the name of]  
c/o [Insert name of client, if different then name we are foreclosing]  
Attn: [Insert Contact Person]  
[Insert address]  
[Insert phone number]

### **BANKRUPTCY NOTICE**

If you are a customer in bankruptcy or a customer who has received a bankruptcy discharge of this debt, please be advised that this letter constitutes neither a demand for payment of the captioned debt, nor a notice of personal liability to any recipient hereof who might have received a discharge of such debt in accordance with the applicable bankruptcy laws or who might be subject to the automatic stay of Section 362 of the United States Bankruptcy Code. Please be advised if the above applies to you, this letter is being served only for informational purposes.

### **SERVICEMEMBERS' CIVIL RELIEF ACT NOTICE**

If you believe that you are entitled to the benefits as outlined in the Servicemembers' Civil Relief Act, you should promptly provide us with evidence of your active duty status.

If you dispute that you are in default and/or the correctness of the amount necessary to cure the default, you should contact [insert client contact person, client name, address], or by calling [insert client phone number].

UNLESS YOU DISPUTE THE VALIDITY OF THIS DEBT OR ANY PORTION THEREOF IN WRITING WITHIN THIRTY-FIVE (35) DAYS OF YOUR RECEIPT OF THIS LETTER, THE DEBT WILL BE ASSUMED TO BE VALID. IF, WITHIN THIRTY-FIVE (35) DAYS OF YOUR RECEIPT OF THIS LETTER, YOU NOTIFY US THAT THE DEBT, OR ANY PORTION THEREOF, IS DISPUTED, VERIFICATION OF THE DEBT WILL BE PROVIDED TO YOU. WE WILL PROVIDE YOU WITH THE NAME AND ADDRESS OF THE ORIGINAL LENDER IF DIFFERENT FROM THE CURRENT LENDER, IF YOU REQUEST THIS INFORMATION WITHIN THIRTY-FIVE (35) DAYS.

**PLEASE NOTE THIS COMMUNICATION IS FROM A DEBT COLLECTOR. THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

Very truly yours,

«LFS0\_LTRSIGNATURE»

«LFS0\_LTRSIGNATUREINITIALS»/«lfs0\_userdocinitials»

Enclosure

cc: [client]

## Fair Foreclosure Act Notice of Intention to Foreclose - List of Entities Providing Assistance

The following is a list of governmental and non-profit entities that may provide financial assistance or counseling to borrowers in foreclosure.

**American Credit Alliance, Inc.**  
26 S. Warren St.  
Trenton, NJ 08608  
**609-393-5400**

**Atlantic Human Resources, Inc.**  
1 S. New York Ave.  
Atlantic City, NJ 08401  
**609-348-4131**

**Consumer Credit Counseling Service of Central New Jersey**  
1931 Nottingham Way  
Hamilton, NJ 08619  
**609-586-2574**

**Consumer Credit Counseling Service of New Jersey**  
185 Ridgedale Ave.  
Cedar Knolls, NJ 07927-1812  
**973-267-4324**

**Fair Housing Council of Northern New Jersey**  
131 Main St.  
Hackensack, NJ 07601  
**201-489-3552**

**Garden State Consumer Credit Counseling, Inc.**  
225 Willowbrook Road  
Freehold, NJ 07728  
**1-800-992-4557**

**Jersey Counseling & Housing Development, Inc.**  
29 S. Blackhorse Pike  
Blackwood, NJ 08012  
**856-227-3683**

**Jersey Counseling & Housing Development, Inc.**  
1840 S. Broadway  
Camden, NJ 08104  
**856-541-1000**

**Mercer County Hispanic Association**  
200 E. State St., 2nd Floor  
Trenton, NJ 08607  
**609-392-2446**

**Middlesex County Economic Opportunities Corporation**  
1215 Livingston Ave.  
North Brunswick, NJ 08902  
**732-790-3344**

**Monmouth County Human Services**  
Housing Services Unit  
P.O. Box 3000  
Freehold, NJ 07728  
**732-431-7998**

**NJ Citizen Action** (*main office/financial education center*)  
744 Broad St., Suite 2080  
Newark, NJ 07102  
**973-643-8800**  
**1-800-NJ-OWNER** (loan counseling)  
**1-888-TAXES-11** (free tax preparation assistance)

**NJ Citizen Action** (*Central Jersey*)  
85 Raritan Ave., Suite 100  
Highland Park, NJ 08904  
**732-246-4772**

**NJ Citizen Action** (*South Jersey*)  
2 Riverside Drive, Suite 362  
Camden, NJ 08103  
**856-966-3091**

**Ocean Community Economic Action Now, Inc.**  
22 Hyers St.  
Toms River, NJ 08753-0773  
**732-244-2351, ext. 2**

**Paterson Coalition for Housing, Inc.**  
262 Main St., 5th Floor  
Paterson, NJ 07505  
**973-684-5998**

**Paterson Task Force for Community Action, Inc.**  
155 Ellison St.  
Paterson, NJ 07505  
**973-279-2333**

**Puerto Rican Action Board Housing Coalition Unit**  
90 Jersey Ave.  
New Brunswick, NJ 08903  
**732-249-9700**

**Tri-County Community Action Agency, Inc.**  
110 Cohansey St.  
Bridgeton, NJ 08302  
**856-451-6330**

**Urban League for Bergen County**  
106 W. Palisade Ave.  
Englewood, NJ 07631  
**201-568-4988**

**Urban League for Essex County**  
508 Central Ave.  
Newark, NJ 07101  
**973-624-9535**

**Urban League of Union County**  
288 N. Broad St.  
Elizabeth, NJ 07208  
**908-351-7200**

**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.

## SCHEDULE

### LIST OF NEW JERSEY STATE BAR ASSOCIATION LAWYER REFERRAL SERVICES OR LEGAL SERVICES OFFICES

New Jersey Bar Association - Tel. 908-249-5000

<u>LAWYER REFERRAL SERVICES</u>	<u>TELEPHONE NO.</u>
Atlantic County Bar Association	609-345-3444
Bergen County Barr Association	201-488-0044
Burlington County Bar Association	609-261-4862
Camden County Bar Association	856-964-4520
Cape May County Bar Association	609-463-0313
Cumberland County Bar Association	856-692-6207
Essex County Bar Association	973-622-6207
Gloucester County Bar Association	856-848-4589
Hudson County Bar Association	201-798-2727
Hunterdon County Bar Association	908-735-2611
Mercer County Bar Association	609-890-6200
Middlesex County Bar Association	732-828-0053
Monmouth County Bar Association	732-431-5544
Morris County Bar Association	973-267-5882
Ocean County Bar Association	732-240-3666
Passaic County Bar Association	973-278-9223
Salem County Bar Association	856-678-8363
Somerset County Bar Association	908-685-2323
Sussex County Bar Association	973-267-5882
Union County Bar Association	908-353-4715
Warren County Bar Association	973-267-5882

LEGAL SERVICES OFFICE

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Ex 1

Attorney	Plaintiff	Defendant	Docket No.	County
Pluese, Becker & Saltzman	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	AFKEN MATTHEWS	F-4250-12	Essex
Fein Such Law Group	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	ANDREA GALPERIN	F-2222-07	Burlington
Pluese, Becker & Saltzman	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	ANTOINETTE DI IURA	F-61104-09	Essex
Pluese, Becker & Saltzman	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	ANTONIO TESTINO	F-24487-09	Sussex
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	CHERYL FLESCH	F-40746-09	Monmouth
Fein Such Law Group	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	DIANE M. LEMMA	F-10958-09	Camden
Pluese, Becker & Saltzman	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	EUGENE DUDLEY	F-28440-10	Union
Pluese, Becker & Saltzman	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	EWERTON M. REIS	F-60648-09	Union
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	ISAAC OYEBODE	F -55752-09	Essex

Attorney	Plaintiff	Defendant	Docket No.	County
Fein Such Law Group	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	JACKQUELINE A. WILKINS	F-63083-09	Somerset
Pluese, Becker & Saltzman	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	JEAN ROBERT PIERRE	F-042291-10	Union
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	JOCELYN OCARIZA	F-50482-09	Somerset
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	JOSEPH T. DOUGHERTY	F-30536-10	Essex
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	LAYTON E. FOSTER	F-000881-10	Atlantic
Pluese, Becker & Saltzman	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	LILLIAN M. HAWKINS	F-24925-10	Atlantic
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	LIONDEL F. AWODE	F-59226-09	Mercer
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	MARK RODINA	F-33695-09	Ocean
Fein Such Law Group	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	MICHAEL A. ROBINSON	F-63088-09	Atlantic

Attorney	Plaintiff	Defendant	Docket No.	County
Fein Such Law Group	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	MICHAEL COLNA	F-16999-06	Camden
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	MICHAEL G. CASEY	F-39752-10	Hunterdon
Pluese, Becker & Saltzman	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	PARRISH GOULD	F-037127-10	Cumberland
Fein Such Law Group	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	RAFAEL AGUILES	F-40387-10	Middlesex
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	RALPH ULATOWSKI	F-29967-10	Ocean
Fein Such Law Group	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	RAYMOND HAAS	F-28166-10	Salem
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	RICARDO CACOILO	F-25917-10	Ocean
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	RICHARD OWEN KIRK	F-48650-09	Sussex
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	SANFORD RICKS	F-29906-10	Essex

Attorney Pluse, Becker & Saltzman	Plaintiff THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	Defendant STEVEN R. BIDWEL	Docket No. F-33631-10	County Mercer
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Ex 2

Attorney	Plaintiff	Defendant	Docket No.	County
Parker McCay P.A.	TRIBECA LENDING CORPORATION	DOUGLAS A. POLEC	F-16774-08	Essex
Parker McCay P.A.	TRIBECA LENDING CORPORATION	OLIVIA TARVER f/k/a OLIVIA JOHNSON	F 29734-08	Atlantic
Parker McCay P.A.	TRIBECA LENDING CORPORATION	RONALD M. TAYLOR	F-9776-08	Gloucester

Ex 3

Attorney	Plaintiff	Defendant	Docket No.	County
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	ALLEN J. BARRA	F-34879-09	Essex
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	ANDRE WILLIAMS	F-055179-10	Middlesex
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	ARMANDO GONZALEZ	F-7100-09	Ocean
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	BARBARA GERVASIO	F-29397-10	Union
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	BENSON J. DONALD	F-24817-10	Ocean

Attorney	Plaintiff	Defendant	Docket No.	County
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	BRIAN DOUGHERTY	F-34932-09	Camden
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	CARLTON WORTHY	F-28568-10	Essex
Fein Such Law Group	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	CESAR JIMENEZ	F-13207-12	Monmouth
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	CHALCIUS CHARLES	F-3852-10	Essex
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	CHRISTIAN KARL SWEISBERGER	F-001111-12	Passaic

Attorney	Plaintiff	Defendant	Docket No.	County
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	CHRISTOPHER S. POMILIO	F-004099-12	Gloucester
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	CRAIG P. EDELMANN	F-32555-10	Cumberland
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	CYNTHIA BRITTIN, ET AL	F-58069-09	Gloucester
Fein Such Law Group	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	DEMETRIOS C. GIANNAKARIS	F-6442-12	Cumberland
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	DENNIS LASASSA	F-26631-10	Atlantic

Attorney	Plaintiff	Defendant	Docket No.	County
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	DEREK S. PITTS	F-18081-09	Salem
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	DERRICK CLAY	F-31906-10	Camden
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	DIANE ROMANO	F-59587-09	Morris
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	DINAH L. ELFERS	F-57023-09	Morris
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	DONALD J. MULVEY	F-18728-07	Ocean

Attorney	Plaintiff	Defendant	Docket No.	County
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	ELAINA PEREZ	F-29876-07	Ocean
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	ELLEN P. MCNAMARA	F-4918-08	Passaic
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	ELSYE GARY	F-001116-12	Essex
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	EMORY M. DANIELS	F-32554-10	Camden
Fein Such Law Group	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	FRANCIS NARDUCCI	F-54209-10	Gloucester

Attorney	Plaintiff	Defendant	Docket No.	County
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	FRANK P. DIMINO	F-30289-10	Monmouth
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	GENE PAULETTE CARPINSKI	F-8975-12	Somerset
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	GEORGE A. ROWE, SR.	F-27355-08	Atlantic
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	GEORGE ROBERT PLUM	F-48453-09	Gloucester
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	GERALD MOLARO	F-28105-10	Ocean

Attorney	Plaintiff	Defendant	Docket No.	County
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	GREGORY PEARSON	F-52751-09	Burlington
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	GREGORY TOOKMANIAN	F-034640-10	Bergen
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	HERBERT ROSE	F-09775-10	Monmouth
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	INNOCENT NJOKU	F-030914-09	Essex
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	JAMES J. WINCZUK	F-60791-09	Camden

Attorney	Plaintiff	Defendant	Docket No.	County
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	JAMES KOUKOURDELIS	F-31060-09	Middlesex
Pluse, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	JAMES WOJCIK	F-051629-10	Bergen
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	JEFFREY BERNSTEIN	F-17646-09	Middlesex
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	JERRY FILLOON	F-3652-12	Morris
Pluse, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	JOHN POST	F-59471-10	Burlington

Attorney	Plaintiff	Defendant	Docket No.	County
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	JOHN T. BROWN SR	F-002290-12	Monmouth
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	JONATHAN MINK	F-057104-10	Passaic
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	JOSEPH GALLO	F-60263-09	Camden
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	JOY HARRIS	F-35569-09	Essex
Pluse, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	KEVIN COOPER	F-30978-10	Union

Attorney	Plaintiff	Defendant	Docket No.	County
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	KEVIN D. HEUBEL	F-11952-12	Camden
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	LAKISHA JOHNSON	F-2623-12	Essex
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	LAYTON E. FOSTER	F-000881-10	Atlantic
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	LINDA DELVERDE	F-24825-10	Monmouth
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	LUIS E. CATALDO	F-26162-10	Gloucester

Attorney	Plaintiff	Defendant	Docket No.	County
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	LYDIA GONZALEZ	F-33737-07	Atlantic
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	MARGARET R. FINE	F-49603-09	Bergen
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	MARGUARITA BALAGUER	F-055589-10	Camden
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	MARK L. MUMINK	F-5358-09	Salem
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	MARY M. ZISSIMOS	F-31542-10	Cape May

Attorney	Plaintiff	Defendant	Docket No.	County
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	MICHAEL BYARD	F-45494-09	Passaic
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	MICHAEL SMITH	F-30235-10	Cumberland
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	MOHAMED S. ELSAYED	F-7357-09	Hudson
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	NADINE M. RUSSEL	F-38487-10	Camden
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	OSCAR PIZARRO	F-11863-10	Bergen

Attorney	Plaintiff	Defendant	Docket No.	County
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	RAYMOND S. LOMBARD	F-12453.10	Camden
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	ROBERT COOPER	F-8589-09	Atlantic
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	ROBERT J. HAAK	F-22925-06	Middlesex
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	RODNEY K. MCFARLAND	F-31741-08	Cumberland
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	RUDOLPH STRAUB	F-48478-09	Camden

Attorney	Plaintiff	Defendant	Docket No.	County
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	SAMUEL WILLIAMS	F-30288-10	Essex
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	SIDNEY YOUNG	F-27480-10	Hudson
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	THOMAS MORRIS	F-044856-10	Gloucester
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	THURSELLE CHISOLM A/K/A THURSELLE WATTS	F-4411-08	Essex
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	TIFFANY RAMSEY A/K/A TIFFANY RAMSEY ANDERSON	F-30598-10	Essex

Attorney	Plaintiff	Defendant	Docket No.	County
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	TIM KANOC	F-53760-10	Burlington
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	VADIN MANIS	F-28773-10	Hudson
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	VINCENT T. ROBINSON, JR	F-33511-10	Burlington
Pluese, Becker & Saltzman	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	WAYNE WITHERSPOON	F-046449-10	Passaic
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	WILLIAM NELSON	F-17987-09	Burlington

Attorney	Plaintiff	Defendant	Docket No.	County
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	DOROTHY KLIMAS	F-25453-09	Monmouth
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	ZIVKO M. PIKUNIC	F-31158-10	Hudson

Ex 4

Attorney	Plaintiff	Defendant	Docket No.	County
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	DONITA LOUISE MAYNARD	F-46749-09	Union
Fein Such Law Group	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	ELLIOT E. THOMAS	F-26741-10	Atlantic
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	GEORGE H. ESIAPE	F-29901-10	Middlesex
Parker McCay P.A.	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	JOSEPH VARRIELLO	F-34366-09	Ocean
Parker McCay P.A.	WELLS FARGO BANK, N.A., AS CERTIFICATE TRUSTEE (NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS CERTIFICATE TRUSTEE), IN TRUST FOR REGISTERED HOLDERS OF VNT TRUST SERIES 2010-2	LATEEFAH GAINES	F-2337-10	Union
Fein Such Law Group	THE HUNTINGTON NATIONAL BANK, AS TRUSTEE FOR FRANKLIN MORTGAGE ASSET TRUST 2009-A	THOMAS MCCONVILLE	F-47522-10	Middlesex

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October 9, 2012 SUPERIOR COURT  
CLERK'S OFFICE

**Via Overnight Delivery**

Jennifer Perez, Clerk of the Superior Court  
Superior Court of New Jersey  
25 West Market Street, 6<sup>th</sup> Floor North Wing  
Trenton, New Jersey 08625

**Re: *In re Application by Franklin Credit Management Corporation to Issue Corrected Notices of Intent to Foreclose on Behalf of Identified Foreclosure Plaintiffs in Uncontested Cases***  
**Docket Number F-\_\_\_\_\_**

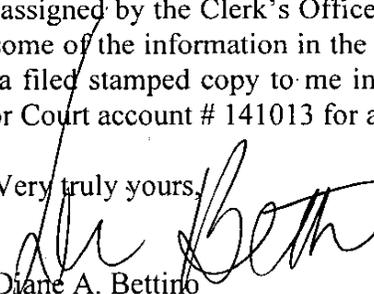
Dear Ms. Perez:

This firm represents Franklin Credit Management Corporation in the above-referenced matter. Enclosed for filing, please find the original and two copies of the following documents:

1. Order to Show Cause to Issue Corrected Notices of Intent to Foreclose;
2. Verified Complaint with Exhibits;
3. Letter Brief in Support of the Application;
4. Proposed Publication Notice; and
5. Certification of Service.

Pursuant to the Order of the Supreme Court, these Orders to Show Cause to correct previously served Notices of Intent to Foreclose will be assigned by the Clerk's Office to either Judge McVeigh or Judge Innes. Therefore, I have not filled in some of the information in the papers, including the county in the caption. Kindly file same and return a filed stamped copy to me in the enclosed self-addressed stamped envelope. Please charge our Superior Court account # 141013 for any filing fees.

Very truly yours,

  
Diane A. Bettino

Enclosures