

Ronald M. and Linda Taylor
(Your Name(s))

128 Newport Road
(Your Mailing Address)

(856) 227-4234
(Your Daytime Telephone Number)

Superior Court of New Jersey
Chancery Division
General Equity

Franklin Credit Management Corporation
(Name of company or bank that filed the foreclosure complaint)

Plaintiff(s),

Gloucester County
County where the property is located or
"Mercer" for an objection to the Order to Show Cause
Docket No F- 022940-12

Vs.

Ronald M Taylor
(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 Ronald M. Taylor and Linda Taylor, the defendant(s) in the foreclosure matter
(filing party or parties)

F-02240-12 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.)

(please see additional page for description of objections. thank you.)

RECEIVED

JAN 08 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.

1/5/2013
Date

Ronald Taylor
Signature

Linda Taylor
Print or Type Name

Linda Taylor
LINDA TAYLOR

Objection to Corrected Notice of Intention to Foreclose
Docket no. F-022940-12

1. The notice of intention to foreclose is faulty . It doesn't lay out any details of the default cure figure. Franklin only states a total amount due of \$101,345.39.
2. We can't know if their calculations are correct, or even on what they are based , if they don't specify what the charges are for. We would like a breakdown with all monthly charges, etc. that caused them to arrive at this figure.
3. One specific example of why we are postulating we know the total amount they are stating is required to reinstate the loan is inaccurate is because it can't reflect any deductions for the uncashed closing checks from 2007 we still have in our possession, which we needed to be reissued at that time in lower amounts as per creditor agreements, and could not reach either Tribeca nor the closing company since they were both out of business
4. Franklin ultimately threw their hands up and passed the buck to the closing company. With numerous calls to different people and supervisors at Franklin, they all said they knew nothing about what to do or who would be able to help us with issuing new and revised checks to pay with, because of the closing company being out of business, as well as Tribeca. They did not take down any information regarding the amounts of the checks therefore did not remove the amounts from their accounting of what is due.
5. Therefore, we are respectfully requesting that Franklin provide us with a full , detailed accounting of how they arrived at the final figure to cure the default.

Thank You.

Respectfully,  x
Linda Taylor
1/5/13

Certification of Service

I hereby certify that on 01/05/2012 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 USPS Overnight, ~~certified, ret. receipt~~

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 Diane A Bettino, Esq

Name _____

Address Reed Smith, LLP Princeton Forrestal Village

Address _____

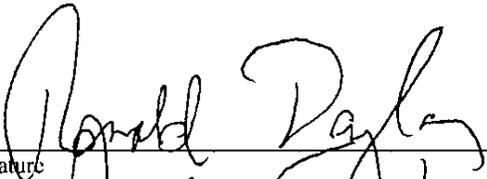
136 Main Street

Princeton, N J 08540

Attorney for Franklin Credit Management Corp

Attorney for _____

1/5/13
Date


Signature

Ronald Taylor
Print or Type Name

Linda Taylor
Linda Taylor

Ronald M. and Linda Taylor
(Your Name(s))

128 Newport Road
(Your Mailing Address)

(856) 227-4234
(Your Daytime Telephone Number)

Superior Court of New Jersey
Chancery Division
General Equity

Franklin Credit Management Corporation
(Name of company or bank that filed the foreclosure
complaint)

Plaintiff(s),

Vs.

Ronald M. Taylor
(Name of first defendant listed on the complaint)
Defendant(s),

Gloucester County
County where the property is located or
"Mercer" for an objection to the Order to Show Cause
Docket No **F-** 022940-12

CIVIL ACTION

OBJECTION TO: (select one)

- Order to Show Cause
 Corrected Notice of Intention to Foreclose

I/We Ronald M. Taylor and Linda Taylor, the defendant(s) in the foreclosure matter
(filing party or parties)

F-02240-12 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.)

(please see additional page for description of objections thank you.)

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.

1/5/2013 Date [Signature] Signature
[Signature] LINDA TAYLOR
Print or Type Name

**Objection to Order to Show Cause
January 5, 2013
Docket no. F-022940-12**

1: The action states that it is an application by Franklin Credit Management Corporation to issue corrected notices of intent to foreclose on behalf of identified foreclosure plaintiffs in uncontested cases. An additional term used was "pending uncontested foreclosure cases that require corrected NOI'S".

2. Franklin, on behalf of Wells Fargo, should not be allowed to serve us with corrected noi's because ours is not an uncontested case. . We filed a timely, contesting answer to the original summons and complaint in 2008 and we have filed objections to all notices since the inception, of which we have the accountable mail proof of receipt from the appropriate courts and Franklin attorneys.

3. Because the above mentioned are not showing up on the ACMS official court document list, we are ultimately proceeding with a motion to the general equity judge in Gloucester County for relief in the way of finding out why these contesting documents were not being listed in the record and subsequently to add these onto the court document list showing this case is not uncontested. We were not issued any order that the answer to the summons and complaint was deemed not contestable and we need the record to reflect this as well as to have all our other answers entered onto the docket sheet. *

4. At that time we had faxed copies of our answer contesting the 2008 foreclosure summons to Judge Rafferty's office at the Gloucester County Court as per his paralegals request. Subsequent to that they had switched judges and I had to fax it all to the new judge as well.

5. In addition, at that time I spoke several times to the person at Judge Rafferty's office who is in charge of scheduling the contest hearings , who stated she could schedule a contest hearing, but because of the disposition of the case, nothing had been scheduled because Franklin hadn't provided an acceptable judgment package. She indicated that she could schedule the contest hearing right then, but considering the court had sent the latest judgment package back to Franklin to correct, we could wait to schedule it

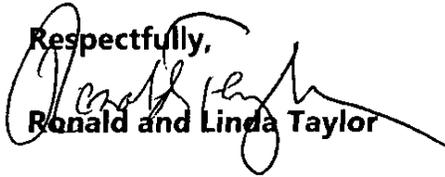
when they refiled another package

6. To have this rectified in the official record as immediately as possible, we respectfully request more time of the court to enable us to take the necessary steps at the Gloucester County Courthouse .

7. Our lawyer service told us about all this during the week, so we just were apprised. They have subsequently requested all the records including the many in the docket's correspondence file .

8. We have hopes that it can all be straightened out when I speak to the above mentioned court personnel , which would avoid the need for the previously mentioned motion hearing request at Gloucester County Courts.

We thank the Court for taking the time to consider our pleas .

Respectfully,

Ronald and Linda Taylor

*I have included an example of our answers not being reflected in the court document sheet. The latest notice we received under the original docket number F-9776-08 was a motion for entry of final judgment and certification of service, dated April,23,2010. That as well was contested but not put into the record.

Certification of Service

I hereby certify that on 01/05/2012 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 USPS Overnight certified, ret. receipt

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 Diane A Bettino, Esq

Name _____

Address Reed Smith, LLP Princeton Forestal Village

Address _____

136 Main Street

Princeton, N J 08540

Attorney for Franklin Credit Management Corp.

Attorney for _____

Date 1/5/13

Signature *Donald Taylor*

Print of Type Name *Donald Taylor*

Linda Taylor
Linda Taylor

(A)

~~example from Objection to Order to Show Cause~~

*no default filed
w/ clerk of
court of chancery*

FEIN, SUCH, KAHN & SHEPARD, P.C.
7 Century Drive, Suite 201
Parsippany, New Jersey 07054
(973) 538-9300
FKL171
Attorney for Plaintiff

TRIBECA LENDING CORP.

Plaintiff

vs.

RONALD M. TAYLOR, et als.

Defendant

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION-
GLOUCESTER COUNTY

DOCKET NO.: F-9776-08

CIVIL ACTION

NOTICE OF MOTION FOR ENTRY
OF FINAL JUDGMENT AND
CERTIFICATION OF SERVICE

TO:

RONALD M. TAYLOR
128 NEWPORT RD
SICKLERVILLE, NJ 08081

LINDA TAYLOR
128 NEWPORT RD
SICKLERVILLE, NJ 08081

A
A

IF YOU DISPUTE THE CORRECTNESS OF THE ENCLOSED CERTIFICATION OF
PROOF OF AMOUNT DUE, YOU MUST DO SO IN WRITING, WITHIN 10 DAYS
AFTER THE DAY OF RECEIPT OF THIS MOTION. YOU MUST FILE YOUR
OBJECTION WITH THE OFFICE OF FORECLOSURE, P.O. BOX 971, 25 MARKET
STREET, TRENTON, NEW JERSEY 08625, AND SERVE A COPY ON THE MOVING
PARTY. THE OFFICE OF FORECLOSURE DOES NOT CONDUCT HEARINGS. YOUR
PERSONAL APPEARANCE AT THE OFFICE WILL NOT QUALIFY AS AN
OBJECTION. IF YOU FILE AN OBJECTION, THE CASE WILL BE SENT TO THE
JUDGE FOR RESOLUTION. YOU WILL BE INFORMED BY THE JUDGE OF THE
TIME AND PLACE OF THE HEARING ON THE MOTION.

TAKE NOTICE that as soon as counsel can be heard, we shall
apply before the Superior Court of New Jersey, Chancery Division.

United States Postal Service® *YOU MAY PICK UP AFTER 4:30 TODAY*

Sorry We Missed You! We Deliver for You *4/13/10* *FEIN*

Item is at Post Office™ (See back) Available for Pick-up After *5/11* Today's Date *4/13/10* Sender's Name *FEIN*

For Redelivery
Go to usps.com/redelivery or see reverse

Letter
 Large envelope, magazine, catalog, etc
 Parcel
 Restricted Delivery
 Perishable Item
 Other

For Delivery: (Enter total number of items delivered by service type)
For Notice Left: (Check applicable item)
 Express Mail® Insured Mail
 Certified Mail™ Return Receipt for Merchandise
(Must claim within 15 days or article will be returned)
 Firm Bill Delivery Confirmation™
 Registered Mail™ Signature Confirmation™

Article Requiring Payment Postage Due COD Customs \$ Final Notice: Article will be returned to sender on

Article Number(s)
7160-3901-9FYF-7564-2481

Notice Left Section
Customer Name and Address
RONALD TAYLOR
128 N. W. SPUR 117

Delivered By and Date

PS Form 3849, September 2009 **usps.com** Delivery Notice/Reminder/Receipt



1001 Fax Serve

Label 1-B, March 20

UNITED STATES POSTAL SERVICE

Post Office To Address

ORIGIN/POSTAL SERVICE USE ONLY

Day of Delivery	Postage
<input type="checkbox"/> 1st <input type="checkbox"/> 2nd <input type="checkbox"/> 3rd Del. Day	\$ 3.10
Estimated Date of Delivery	Return Receipt Fee
Day	\$
Subscribed Time of Delivery	ODD Fee
<input type="checkbox"/> 1st <input type="checkbox"/> 2nd <input type="checkbox"/> 3rd	\$
Insurance	Insured Fee
<input type="checkbox"/> None <input type="checkbox"/> 500 <input type="checkbox"/> 1000	\$
Priority	Total Postage & Fees
<input type="checkbox"/> 1st Day <input type="checkbox"/> 2nd Day	\$ 3.10
Additional Surcharges	Accession, Extra, Special
<input type="checkbox"/> 1st <input type="checkbox"/> 2nd	\$

Delivery Attempt	Time	<input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature
Mo. Day			
Delivery Attempt	Time	<input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature
Mo. Day			
Delivery Date	Time	<input type="checkbox"/> AM <input type="checkbox"/> PM	Employee Signature
Mo. Day			

CUSTOMER USE ONLY

PAYMENT BY ACCOUNT
 Express Mail Corporate Acct. No. _____
 Federal Agency Acct. No. or Postal Service Acct. No. _____

WAIVER OF SIGNATURE (Domestic Mail Only)
 Additional merchandise insurance is void if customer requests waiver of signature. I wish delivery to be made without obtaining signature of addressee or addressee's agent (if delivery employee judges that article can be left unsecured location) and I authorize that delivery employee's signature constitutes valid proof of delivery.

NO DELIVERY
 Weekend Holiday Mailer Signature _____

TO: (PLEASE PRINT) PHONE #

015
B
B

STATE OF CONNECTICUT
 2000
 NEW JERSEY 08021

TO: (PLEASE PRINT) PHONE #

STATE OF CONNECTICUT
 2000
 NEW JERSEY 08021

ZIP + 4 (U.S. ADDRESSES ONLY. DO NOT USE FOR FOREIGN POSTAL CODES)

08021 +

FOR INTERNATIONAL DESTINATIONS, WRITE COUNTRY NAME BELOW

PICKUP OR TRACKING

www.usps.com

1-800-222-1811

Image of the recipient information is provided below.

Signature of Recipient

Address of Recipient

Capital Post Office

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely



Date: 01/14/2011

Fax Transmission To: linda taylor
Fax Number 856-227-4234

Dear: linda taylor:

The following is in response to your 01/14/2011 request for delivery information on your Express Mail(R) item number EG34 2939-959 U.S. The delivery record shows that this item was delivered on 05/07/2010 at 06:16 AM in TRENTON, NJ 08625 to J LEWANDOWSKI. The scanned image of the recipient information is provided below:

Signature of Recipient

A handwritten signature in black ink, appearing to read "J. Lewandowski", written over a horizontal line. To the left of the signature is a small vertical stamp with the letters "NY" and "NO".

Address of Recipient

A handwritten address in black ink, "Capital Post Office", written over a horizontal line. To the left of the address is a small vertical stamp with the letters "NY" and "NO".

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely

United States Postal Service



Customer Copy
Label 11-B, March 2004



EG 34293992 US

UNITED STATES POSTAL SERVICE

Post Office To Addressee

(POSTAL SERVICE USE ONLY)

Code: *156*

Day of Delivery: *10/11/04*

Postage: *1.56*

Return Receipt Fee: *0.00*

Subscribed Date of Delivery: *10/11/04*

Subscribed Time of Delivery: *3 PM*

COO Fee: *0.00*

Insurance Fee: *0.00*

Total Postage & Fees: *1.56*

Acceptance Emp Initials: *1565*

DELIVERY (POSTAL USE ONLY)		
Delivery Attempt	Time	Employee Signature
Mo. Day	<input type="checkbox"/> AM <input type="checkbox"/> PM	
Delivery Attempt	Time	Employee Signature
Mo. Day	<input type="checkbox"/> AM <input type="checkbox"/> PM	
Delivery Date	Time	Employee Signature
Mo. Day	<input type="checkbox"/> AM <input type="checkbox"/> PM	

CUSTOMER USE ONLY

PAYMENT BY ACCOUNT: Express Mail Corporate Acct. No. FEDERAL AGENCY ACCT. NO. OR POSTAL SERVICE ACCT. NO.

WARNER OF SIGNATURE (Domestic Mail Only): Additional merchandise insurance is valid if customer requests waiver of signature. I wish delivery to be made without obtaining signature of addressee or addressee's agent (if delivery employee judges that article can be left in secure location) and I authorize that delivery employee's signature constitutes valid proof of delivery.

NO DELIVERY: Weekend Holiday Mailer Signature

FROM: (PLEASE PRINT) PHONE: () - -

Linda & Ronald Taylor
128 Newport Rd
Sicklerville NJ 08081

TO: (PLEASE PRINT) PHONE: () - -

7 Century Drive Suite 20
Passippany NJ 07054

ZIP + 4 (U.S. ADDRESSES ONLY. DO NOT USE FOR FOREIGN POSTAL CODES.)

0 7 0 5 4 + [] [] [] []

FOR INTERNATIONAL DESTINATIONS, WRITE COUNTRY NAME BELOW

OR PICKUP OR TRACKING

www.usps.com

800-222-1811

Image of the recipient information is provided below.

Signature of Recipient: **Delivery Section**

X *Marilyn Evans*

X **MARILYN EVANS**

Address of Recipient:

7 Century Dr. NJ

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely
United States Postal Service

scanned

12



Date: 01/14/2011

Fax Transmission To: linda taylor
Fax Number: 856-227-4234

Dear Linda Taylor:

The following is in response to your 01/14/2011 request for delivery information on your Express Mail(R) item number EG34 2939 962U S. The delivery record shows that this item was delivered on 05/07/2010 at 10:59 AM in PARSIPPANY, NJ 07054 to M EVANS. The scanned image of the recipient information is provided below.

Signature of Recipient:

Delivery Section	
Signature	<i>Marilyn Evans</i>
Print Name	MARILYN EVANS

Address of Recipient:

Address	<i>7 Cortland St. NJ</i>
---------	--------------------------

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely

United States Postal Service