Clerk's Note:
F-23925-12

MESSA & ASSOCIATES, P.C.
BY: Thomas F. Margiotti, Esquire
123 South 22nd Street
Philadelphia, PA 19103
(215)778-0640

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SUPERIOR COURT/LAW DIV.

NATIONSTAR MORTGAGE, LLC Plaintiff v. BIENVENIDA BERRIOS HEIRS, DEVISEES, AND PERSONAL REPRESENTATIVES et als Defendant	:	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION CAMDEN COUNTY DOCKET NO. : F-1320-12 CIVIL ACTION Response Order to Show Cause

I ELSI CINTRON Individually and as ADMINSTRATRIX of the Estate of BIENVENIDA BERRIOS, defendants, in the above foreclosure matter, NationStar v. Berrios F1320-12 Through her attorney, Thomas F. Margiotti, Esquire, hereby object to the plaintiff's filing of the Order to Show Cause for the following specific reasons:

1) In Plaintiffs's original Complaint certified under oath that Notice of Intention was filed in compliance with the Fair Foreclosure Act.
2) Plaintiff now admits this was not correct.
3) Nonetheless less Plaintiff moved for Entry of Default against Defendants.
4) It is unfair to allow Plaintiff to amend and make changes while Defendant is placed and remains in default of an improperly filed Complaint and/or Notice of Intention To Foreclose.
5) Plaintiff's Order to Show Cause is now barred under the doctrine of Waiver.
6) Plaintiff Order to Show Cause is now bared by the Doctrine of Estoppel.
7).Plaintiff Order to Show Cause is now is now barred by the Doctrine of Latches.

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

January 14, 2013

Thomas f. Margiotti,
Attorney for Defendants

FILED Jan 14, 2013

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123 South 22nd Street
Philadelphia, PA 19103
(215)778-0640

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CLERK'S OFFICE

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SUPERIOR COURT/LAW DIV.

NATIONSTAR MORTGAGE, LLC	:	SUPERIOR COURT OF NEW JERSEY
	:	CHANCERY DIVISION
Plaintiff	:	CAMDEN COUNTY
	:	
	:	DOCKET NO. : F-1320-12
v.	:	
	:	CIVIL ACTION
	:	Response
BIENVENIDA BERRIOS HEIRS,	:	Corrected Notice of Intention to Foreclose
DEVISEES, AND PERSONAL REPRESENTATIVES et als	:	
	:	
Defendant	:	
	:	

I ELSI CINTRON Individually and as ADMINSTRATRIX of the Estate of BIENVENIDA BERRIOS, defendants, in the above foreclosure matter, NationStar v. Berrios F1320-12 Through her attorney, Thomas F. Margiotti, Esquire, hereby object to the plaintiff's filing of the Order to Show Cause for the following specific reasons:

1) In Plaintiffs's original Complaint certified under oath that Notice of Intention was filed in compliance with the Fair Foreclosure Act.
2) Plaintiff now admits this was not correct.
3) Nonetheless less Plaintiff moved for Entry of Default against Defendants.
4) It is unfair to allow Plaintiff to amend and make changes while Defendant is placed and remains in default of an improperly filed Complaint and/or Notice of Intention To Foreclose.
5) Plaintiff's Corrected Notice of Intention to Foreclose is now barred under the doctrine of Waiver.
6) Plaintiff Corrected Notice of Intention to Foreclose is now bared by the Doctrine of Estoppel.
7).Plaintiff Corrected Notice of Intention to Foreclose is now is now barred by the Doctrine of Latches.

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

January 14, 2013

Thomas f. Margiotti,
Attorney for Defendants

I hereby certify that on January 14, 2013 I sent my objection to the following parties by regular mail.

Fein, Such, Kahn & Shepard P.C. Attorneys for Plaintiff, At 7 Sentry Drive Suite 201 Parsippany, NJ 07054.

Gayl C. Spivak, Esq McCabe, Weisberg & Conway, P.C. Attorneys for Plaintiff 216 Haddon Avenue-Suite 103 Westmont, New Jersey 08108

Messa & Assciates, PC

January 14, 2013

Thomas F. Margiotti, Esquire

Attorney for Defendant Elsie Cintron Individually and as Administratrix for the Estate of Bienvenida Berrios