

Sills Cummis & Gross
A Professional Corporation

The Legal Center
One Riverfront Plaza
Newark, New Jersey 07102
Tel: (973) 643-7000
Fax: (973) 643-6500

Peter G. Verniero
Member
Direct Dial: (973) 643-5485
E-mail: pverniero@sillscummis.com

One Rockefeller Plaza
New York, NY 10020
Tel: (212) 643-7000
Fax: (212) 643-6500

650 College Road East
Princeton, NJ 08540
Tel: (609) 227-4600
Fax: (609) 227-4646

February 11, 2011

Hon. Walter R. Barisonek
(Special Master)
Union County Courthouse, Courtroom 101
2 Broad Street
Elizabeth, New Jersey 07207

RE: F-238-11 Certification of Scott A. Whitney

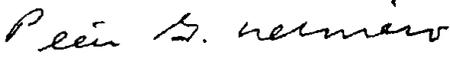
Dear Judge Barisonek:

This Firm represents Household Finance Company, HSBC Bank USA, N.A. and HSBC Mortgage Corporation (collectively, HSCB). On behalf of those clients, I enclose three copies of a certification of Scott A. Whitney, which are being submitted pursuant to Administrative Order 01-2010 dated December 20, 2010, as modified by Supplemental Administrative Order dated January 31, 2011 (collectively, the Order). As Your Honor will see, the certification provides information relating to paragraphs (1) and (2) of the Order. My understanding is that, in accordance with Your Honor's instructions dated February 4, 2011, HSBC's response to paragraph (3) of the Order shall be due at a later date.

Kindly have the Clerk return a filed-stamped copy of Mr. Whitney's certification in the postage prepaid envelope, which is enclosed. In addition, please charge my Firm's Superior Court account, number 094900, for any filing fees. I am also enclosing a certification of David Cook pursuant to *Rule* 1:4-4. Please advise if you would like me to forward to Your Honor the signature page of Mr. Whitney's certification bearing his original signature, or to maintain that page in my file. A copy of this letter and the enclosed certifications are being sent via regular mail to the Superior Court at the address contained in the Order.

Thank you for your attention to this matter.

Respectfully submitted,


Peter G. Verniero

Enclosures

IN THE MATTER OF RESIDENTIAL
MORTGAGE FORECLOSURE
PLEADING AND DOCUMENT
IRREGULARITIES

Administrative Order 01-2010
Docket # F-238-11

**CERTIFICATION OF
SCOTT A. WHITNEY**

SCOTT A. WHITNEY, being of full age, hereby certifies and states as follows:

1. I am a Vice President of CML Default Services at HSBC Consumer and Mortgage Lending. I have held this position for approximately three years and am responsible for management and oversight of the foreclosure process for all HSBC real estate entities. I have been employed by various HSBC entities since September 2002.

2. I make this Certification in support of HSBC Bank USA, N.A. ("HSBC Bank"), HSBC Mortgage Corporation ("HSBC Mortgage") and Household Finance Company ("Household," collectively "HSBC") pursuant to Administrative Order 01-2010 issued by the Honorable Glenn A. Grant, Acting Administrative Director of the Courts, dated December 20, 2010, as modified by the Supplemental Administrative Order dated January 31, 2011, and consistent with instructions dated February 4, 2011, from the Special Master appointed in this matter

3. Based on my personal review of applicable business records, I am familiar with the facts set forth in this Certification.

I. HSBC and Affiliated Entities that Serviced Residential Mortgage Loans in New Jersey as of December 31, 2010

4. According to HSBC business records, HSBC Mortgage, Beneficial Financial I Inc. ("Beneficial F I"), Household Finance Corp. III ("Household FC III"), and HSBC Mortgage Services, Inc. ("HSBC MSI"), each serviced residential mortgage loans as of December 31, 2010 in New Jersey.

5. HSBC Mortgage serviced a total of 12,436 loans in New Jersey as of December 31, 2010, of which 536 were the subject of contested or uncontested foreclosure actions as of that date. The entities for which HSBC Mortgage serviced those 12,436 loans and the respective numbers of loans serviced for each entity and number of loans in foreclosure were as follows:

Entity For Which HSBC Mortgage Serviced Loans	Serviced Loans as of 12/31/10	Loans in Foreclosure as of 12/31/10
Aurora Loan Services, Inc. – Master Servicer	5	2
Bank of America Merrill Lynch	19	0
Bank of New York	2	0
Bank United	3	0
CCO Mortgage	2	0
CitiMortgage, Inc. – Master Servicer	18	3
Doolin Security Savings Bank	1	0
Fannie Mae	6,336	298
Fannie Mae LTSB	1	0
Freddie Mac	3,068	80
Freddie Mac LTSB	6	0
GMAC	106	20
GNMA	217	0

HSBC Bank USA, N.A.	2,188	115
HSBC Mortgage Corporation (USA)	317	5
Hudson City Savings Bank	2	0
Investor Savings Bank	8	0
JPMorgan Chase Bank N.A.	5	1
New York Life Insurance Company	2	0
Parkvale Savings Bank	5	0
Sovereign Bank	2	0
Wells Fargo Bank Minnesota, N.A. – Master Servicer	123	12
TOTAL	12,436	536

NOTE. These figures reflect presently available information as of December 31, 2010.

6. Beneficial F I serviced 5,253 residential mortgage loans for itself in New Jersey as of December 31, 2010, of which 568 were the subject of contested or uncontested foreclosure actions as of that date.

7. Household FC III serviced 4,804 residential mortgage loans for itself in New Jersey as of December 31, 2010, of which 457 were the subject of contested or uncontested foreclosure actions as of that date.

8. HSBC MSI serviced 1,467 loans in New Jersey as of December 31, 2010, of which 231 were the subject of contested or uncontested foreclosure actions as of that date. The entities for which HSBC MSI serviced those 1,467 loans and the respective numbers of loans serviced for each entity and number of loans in foreclosure were as follows:

Entity For Which HSBC MSI Serviced Loans	Serviced Loans as of 12/31/10	Loans in Foreclosure as of 12/31/10
Beneficial Mortgage Corp.	105	5
Household Finance Corp. III	1,275	215
HSBC Bank USA	74	5
HSBC Mortgage Services, Inc.	7	5
Aurora Loan Services, Inc.	6	1
TOTAL	1,467	231

NOTE: These figures reflect presently available information as of December 31, 2010.

II. Other Entities that Serviced Residential Mortgage Loans for HSBC and HSBC's Affiliated Entities in New Jersey as of December 31, 2010

9. According to HSBC business records of presently available information, HSBC Bank contracted with other entities to service a combined total of 209 of its residential mortgage loan portfolio in New Jersey as of December 31, 2010. Forty-six of those loans were the subject of contested or uncontested foreclosure actions as of that date.

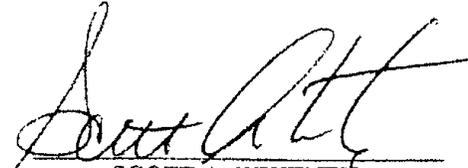
10. Citimortgage serviced 10 residential mortgage loans for HSBC Bank (and managed by HSBC Mortgage) in New Jersey as of December 31, 2010, of which 1 was the subject of a foreclosure action as of that date. Sovereign serviced 1 residential mortgage loan for HSBC Bank (and managed by HSBC Mortgage) in New Jersey as of December 31, 2010, none of which was the subject of a foreclosure action.

11. American Home Mortgage Servicing, Inc. ("AHMSI") serviced 29 residential mortgage loans for HSBC Bank (and managed by HSBC Securities (USA) Inc.) in New Jersey as of December 31, 2010, of which 6 were the subject of contested or uncontested foreclosure actions as of that date. Bank of America serviced 151 residential mortgage loans for HSBC Bank (and managed by HSBC Securities (USA) Inc.) in New Jersey as of December 31, 2010, of

which 37 were the subject of contested or uncontested foreclosure actions as of that date. Wells Fargo serviced 18 residential mortgage loans for HSBC Bank (and managed by HSBC Securities (USA) Inc) in New Jersey as of December 31, 2010, of which 2 were the subject of contested or uncontested foreclosure actions as of that date.

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

Dated: February 11, 2011



SCOTT A. WHITNEY

Sills Cummis & Gross P.C.
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One Riverfront Plaza
Newark, NJ 07102
Tel. (973) 643-5695
Fax. (973) 643-6500

IN THE MATTER OF RESIDENTIAL
MORTGAGE FORECLOSURE
PLEADING AND DOCUMENT
IRREGULARITIES

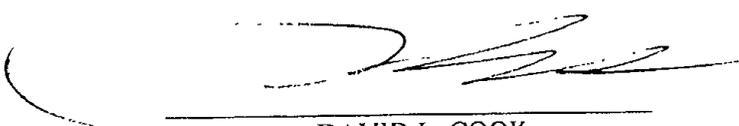
Administrative Order 01-2010
Docket # F-238-11

RULE 1:4-4(c) CERTIFICATION

DAVID L. COOK, being of full age, hereby certifies and states as follows.

1. I am an attorney-at-law licensed to practice in the State of New Jersey and am Of Counsel of the law firm Sills Cummis & Gross P.C., attorneys for Respondents HSBC Bank USA, N.A., HSBC Mortgage Corporation and Household Finance Company (collectively, "HSBC") in the above matter.
2. The accompanying Certification of Scott A. Whitney contains his .PDF signature. I certify pursuant to R. 1:4-4(c) that Mr. Whitney has acknowledged the genuineness of his signature and that the document or a copy with the original signature will be filed if requested by the Special Master or the Court.
3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: February 11, 2011



DAVID L. COOK