



EDWARD J. DAUBER

March 18, 2011

VIA E-MAIL AND REGULAR MAIL

Hon. Mary C. Jacobson, P.J. Ch.
Mercer County Civil Courthouse
210 South Broad Street, 5th Floor
P.O. Box 8068
Trenton, New Jersey 08650

**Re: In the Matter of Residential Mortgage Foreclosure
Pleading and Document Irregularities
Docket No.: F-059553-10**

Dear Judge Jacobson:

Pursuant to Your Honor's Order to Show Cause, entered in the above-referenced matter on December 20, 2010, this office was appointed "to respond to the submissions made to the court by the Foreclosure Plaintiffs and to appear before the court on the return date" of the Order to Show Cause "to present argument supporting the appointment of a Special Master and the suspension of foreclosure processing for complaints filed by the Foreclosure Plaintiffs." Please accept this letter brief and the enclosed Recommended Stipulation in lieu of our response to the Respondents'¹ written oppositions to the Order to Show Cause, since we have been able to reach agreement with Respondents on a proposed stipulation to resolve this matter.

¹ While Your Honor's December 20, 2010 Order to Show Cause refers to the six entities to which it is directed as the "Foreclosure Plaintiffs," we shall refer to them in the instant submission as the "Respondents," since the entities are Respondents to the Order to Show Cause

BACKGROUND AND PROCEDURAL HISTORY

The December 20th Order to Show Cause

On December 20, 2010, this Court entered an Order to Show Cause directed at: Bank of America, d/b/a BAC Home Loan Servicing, LP; Citibank, N.A. and Citi Residential Lending, Inc ; GMAC Mortgage, LLC; JPMorgan Chase Bank, N.A. and Chase Home Finance LLC, OneWest Bank, FSB; and Wells Fargo Bank, N.A. (collectively, "Respondents").

The Order to Show Cause was a response to growing concern that documents submitted by foreclosure plaintiffs, and relied upon by the Judiciary, in uncontested foreclosure proceedings did not comply with New Jersey law requiring affiants to possess personal knowledge of the facts to which they attest. This practice has been generally labeled "robo-signing."²

As described by the Honorable Glenn A. Grant, J.A.D., Administrative Director of the Courts, "[r]obo-signers' are mortgage lender/services employees who sign hundreds – in some cases thousands – of affidavits submitted in support of foreclosure claims without any personal knowledge of the information contained in the affidavits. 'Robo-signing' may also refer to improper notarizing practices or document backdating." Admin. Order 01-2010 at 3 n.1

² Contemporaneously, the Supreme Court adopted emergency amendments to Rules 4:64-1 and 4:64-2 concerning filings in uncontested residential mortgage foreclosure actions, designed to address the "robo-signing" problem. The emergency amendments to Rules 4:64-1 and 4:64-2 require additional certifications and affidavits of diligent inquiry by the attorney handling the uncontested residential mortgage foreclosure action to ensure that filings to the Superior Court at both the complaint and final judgment stage are accurate ("the Rule Amendments"). The Court later opened a public comment period concerning these emergency Rule Amendments, which closed on February 28, 2011. As of the date of this letter, no further revision to Rules 4:64-1 or 4:64-2 has issued as a result of the public comment period.

On November 4, 2010, Legal Services of New Jersey submitted a Report and Recommendations to the New Jersey Supreme Court Concerning False Statements and Swearing in Foreclosure Procedures (“LSNJ Report”).³ The LSNJ Report documented a variety of execution and notarization irregularities in the foreclosure process nationwide, providing a wealth of materials documenting that these irregularities had occurred. Among the irregularities described by the LSNJ Report, and identified as part of the “robo-signing” problem, were:

- Lack of personal knowledge of an affiant whose certification states that s/he has personal knowledge;
- Failure to review documents or other evidence on which the certification is based and which it may generally reference;
- ...
- False identification of signatory (*e.g.*, an employee of a servicer will be identified as a vice president, or similar title, of the foreclosing mortgagee);
- Forged signatures; [and]
- Execution outside the presence of a notary, who nevertheless notarizes the signature

LSNJ Report at 2.

The Six Respondents were selected specifically for the Order to Show Cause for two reasons. First, the Six Respondents account for a large majority of the foreclosure actions in the New Jersey courts. Any Judiciary-wide correction of the “robo-signing” issue in the State of New Jersey must logically begin with these Six Respondents. Second, the Six Respondents were selected for inclusion in the Order to Show Cause because there has been deposition testimony and/or other materials forming a public record in various jurisdictions across the United States indicating that each of the Six Respondents have encountered “robo-signing” problems concerning their foreclosures in the past. *See* Order to Show Cause at 2-3. Using this public record as a starting

³ <http://www.lsnj.org/keyRecentDevelopments/Foreclosure/materials/LSNJReport.pdf>

point, the Judiciary entered the Order to Show Cause directed at the specific Six Respondents as a means of beginning the process of reestablishing integrity and confidence in the submissions made in all uncontested residential mortgage foreclosure actions

As noted above, the Order to Show Cause appointed this office to respond to Respondents' opposition, if any, to the Order to Show Cause and to argue in support of the proposed relief and procedures contained in the Order to Show Cause in any subsequent proceedings.

The Six Respondents' January 5th Submissions

Each of the Six Respondents submitted papers in opposition to the Order to Show Cause on January 5, 2011. In their opposition papers, the Respondents made various procedural arguments against the Order to Show Cause itself, as well as against the proposed substantive relief outlined in the Order to Show Cause. Specifically, five of the Six Respondents argued that this Court could not appoint a Special Master for one of several posited reasons. First, several Respondents argued that the appointment of a Special Master to review Respondents' mortgage foreclosure practices exceeded this Court's jurisdiction and was preempted by federal banking laws. Further, Respondents argued that the federal Office of the Comptroller of the Currency ("OCC") has exclusive oversight authority over federally chartered financial institutions as their primary regulator. Respondents also argued that appointment of a Special Master exceeded the Court's authority under the New Jersey Court Rules and case law concerning such appointments

Additionally, all Six Respondents argued in their January 5th submissions that the appointment of a Special Master, the suspension of Respondents' foreclosure proceedings, and the levying of sanctions against Respondents would all be Constitutionally problematic. Specifically,

Respondents argued that the appointment of a Special Master would violate the Supremacy Clause of the U.S. Constitution. Respondents argued that the suspension of foreclosure proceedings would constitute unconstitutional takings and interference with the right of contract. Finally, Respondents argued that the fact that the Order to Show Cause singles out these specific banks and mortgage loan servicers is a violation of the Six Respondents' due process and equal protection rights.

Finally, and significantly, all Six Respondents provided affidavits and certifications attesting that Respondents have undertaken substantial efforts to correct document execution and notarization irregularities and describing those efforts. In short, while Respondents acknowledged that there had been document irregularities in the past, Respondents stated that such problems were corrected and safeguards are now in place to ensure that such irregularities and "robo-signing" would not occur again.

Other Efforts Nationwide to Address the "Robo-Signing" Issue

As noted above, in preparing its report, LSNJ described reports of document signing irregularities nationwide. Because the "robo-signing" issue and the mortgage crisis generally are national issues, they are being addressed on many fronts. Numerous executive agencies across the country, including all fifty state Attorneys General, numerous United States Attorney's Offices, as well as the investigative branches of various federal regulatory agencies, are investigating all aspects of the nation's current mortgage crisis.

Specifically, in Fall 2010, the Attorneys General of all fifty states announced a joint investigation, led by Iowa Attorney General Tom Miller, into home foreclosures and the practices of mortgage lenders and mortgage loan servicers. Similarly, since Fall 2010 and the revelation of

the “robo-signing” problem, a task force of federal bank regulators led by the Office of the Comptroller of the Currency has been reviewing the foreclosure practices and internal controls of the fourteen largest mortgage servicers, including all six of the Respondents in this matter. Similarly, the Consumer Financial Protection Bureau, newly created by the July 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act, is also currently undertaking a comprehensive investigation concerning all aspects of the mortgage process, both lending and foreclosure. These investigations are wide-ranging in scope and could result in a variety of remedies, both remedial and punitive.

Likewise, legislative bodies around the nation, both state and federal, are considering various issues and concerns relating to the mortgage industry and foreclosure process generally. On February 25, 2011, the House Committee on Oversight and Government Reform requested various information from eleven mortgage servicers and foreclosure specialists, five of which are among the Six Respondents in this matter, including information concerning a special review of servicer abuse claims and the actions of law firms that specialize in foreclosures. Similarly, the U S Senate Committee on Banking, Housing, and Urban Affairs has been holding hearings investigating problems in the mortgage servicing industry since November 2010.

Thus, it was with an awareness of these other efforts to address the “robo-signing” issues that this office commenced discussions with the Respondents to determine whether the primary concern of the Judiciary - ensuring the integrity and transparency of its processes and the submissions to it - could be met without the necessity of protracted litigation of the legal and factual issues raised by Respondents in opposition to the Order to Show Cause. Put another way, the issue addressed in this

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office's negotiations was what could be done to provide comfort that once uncontested residential mortgage foreclosure proceedings recommenced, the certifications and affidavits that are being submitted are going to be executed and notarized by affiants with personal knowledge of the facts they contain

Settlement Negotiations with Court Appointed Counsel

Acting as court appointed counsel in this matter, this office began by meeting with each of the Six Respondents individually to discuss each Respondent's individual situation vis-a-vis the Order to Show Cause. This office also held several settlement meetings and negotiation sessions with counsel for all Six Respondents collectively through January and early February 2011

During this same time period, this office also met with personnel at the Office of Foreclosure, the Administrative Office of the Courts, and the Superior Court Clerk's Office to gain an understanding of the procedural and logistical mechanics of New Jersey's foreclosure process

Throughout this settlement process, this office's position with the Six Respondents was to find a way to ensure the accuracy and transparency of the foreclosure process that had been called into question by the revelation of the "robo-signing" practices, both with respect to Respondents' pending uncontested residential mortgage foreclosure filings and new residential mortgage foreclosures to be filed in 2011 and beyond

While the Order to Show Cause did not order an immediate suspension of foreclosure processing for the Respondents, *de facto* there has been such a suspension, either because Respondents or some of them had earlier ceased processing foreclosures in New Jersey on their own while attempting to address the "robo-signing" issue or because the effect of the Rule Amendments,

as worded in the December 20th emergency revisions, was to make it impractical or unfeasible for Respondents to pursue foreclosures. The result of this *de facto* suspension has been that tens of thousands of properties as to which there are uncontested foreclosure proceedings in New Jersey are in limbo. All concerned recognized that an efficient, fully functional, accurate, transparent, and normalized foreclosure process is in the interests of the Judiciary, New Jersey citizens and communities, the residential housing market, and the broader economy.

These considerations undergirded the settlement discussions as this office and Respondents sought to find a practical process that would both satisfy the Judiciary's concerns regarding document execution practices while at the same time permit the residential mortgage foreclosure process to function efficiently in the State of New Jersey. The result of these negotiations is the attached Recommended Stipulation, agreed to by all parties. The centerpiece of the Recommended Stipulation is the now agreed to appointment of a Special Master, who will have to be satisfied that an adequate *prima facie* showing has been made that Respondents have in place a process that will ensure that information set forth in affidavits submitted to the Judiciary is based on both the personal knowledge of the signatory and on the accurate business records of the appropriate entity before Respondents are allowed to resume processing of their pending portfolios which they are servicing. The Special Master will also have the further power, for a period of twelve months, to verify that the Respondents continue to adhere to the processes they described in order to satisfy the *prima facie* showing.

I. THE RECOMMENDED STIPULATION

The crux of the Recommended Stipulation is the appointment of a Special Master. Respondents consent to the appointment of a Special Master to perform the services described in the Recommended Stipulation. *See* Rec. Stip. ¶ 2. In addition, Respondents have agreed to bear the costs of the Special Master as well as the costs of court appointed counsel, who will continue as Special Counsel to the Special Master. *See* Rec Stip ¶ 14.

A. The Appointment of the Special Master

Rule 4:41 permits a judge of the Superior Court, with the approval of the Assignment Judge, to refer the hearing of a matter or portion of a matter to a Special Master. The State Supreme Court has noted the utility of a *Rule* 4:41 reference, stating that “[t]he use of such Special Masters, sometimes called ‘hybrid’ masters, is not uncommon in litigation resulting in some form of institutional change.” *So. Burlington Cty N.A.A.C.P. v Mount Laurel Twp*, 92 N.J. 158, 281-82 (1983) (setting forth process for appointing Special Master to assist municipal officials in developing constitutional land use and zoning regulations).

“These impartial experts use their skills to help the parties formulate a remedy that will comply with the trial court’s order and supply information that the parties may not have available to them.” *Id.* at 282. “They differ from traditional masters, whose roles are usually limited to serving as fact-finders and supervising procedural tasks in that Special Masters work with the parties to devise a remedy that will meet with the court’s approval.” *Id.*; *see also* *Abbott v. Burke*, 199 N.J. 140 (2008) (Special Master appointed to develop an evidential record concerning the constitutionality of provisions of the New Jersey School Funding Reform Act of 2008); *State v*

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Chun, 194 N.J. 54 (2008) (Special Master appointed to conduct a plenary hearing on the reliability of Alcotest breath test instruments).

This office understands that the person being considered to be appointed as Special Master in this matter is the Honorable Richard J. Williams, retired Superior Court Judge and former Administrative Director of the Courts. Judge Williams has served the State of New Jersey for nearly forty years. Beginning in 1972, Judge Williams served in the Atlantic County Prosecutor's Office until 1981, when Judge Williams was appointed to the Superior Court. From 1983 until 1985, Judge Williams served as Presiding Judge of the Family Division in the Atlantic and Cape May Vicinage and from 1985 until 1999, Judge Williams served as Assignment Judge in that same vicinage. On August 1999, Judge Williams was assigned to the Appellate Division and appointed the Acting Administrative Director of the Courts, which position he held until September 2004.

As Administrative Director of the Courts, Judge Williams obtained extensive experience in the workings and mechanics of the New Jersey State Judiciary, including the Office of Foreclosure. Thus, Judge Williams has a keen understanding of the practical difficulties facing the New Jersey court system in the face of an increasing volume of uncontested residential mortgage foreclosure cases. These difficulties are significantly compounded when, as caused by the " robo-signing " crisis, the Judiciary can no longer rely on the integrity of the documents submitted to it. Judge Williams's decades of experience on the bench and as a judicial administrator make him eminently suited for tasks charged to the Special Master in this case. This office strongly recommends Judge Williams's appointment as Special Master.

B. The Special Master's Recommended Role and Scope of Inquiry

The Recommended Stipulation envisions a two-step inquiry by the Special Master which will consist of: (1) a preliminary prima facie showing by the Respondents concerning their respective document execution processes; and (2) a subsequent performance review by the Special Master to ensure that those processes are in fact being employed (collectively, "the Special Master Process")

Importantly, the Special Master Process will concern the respective Respondents' participation in the residential mortgage foreclosure process in their capacity as servicer. This office and the Judiciary recognize that in most cases, it is the servicer that either has the information or has direct access to the information that is required to be provided under the Rules of Court governing residential mortgage foreclosures. Servicers manage, maintain, and handle the accounting for the mortgages that they service and, as such, in the case of default or non-payment on the part of a mortgagor, it is the servicer, and not necessarily the mortgagee or named plaintiff in the resulting mortgage foreclosure action, that either has the information or has direct access to the information concerning the default or non-payment.

The Six Respondents, acting as servicers, account for a majority of the residential mortgage foreclosure matters pending in the Courts of the State of New Jersey, both contested and uncontested. Thus, the Respondents' participation in the Special Master Process as servicers will both: (1) ensure that the entity with the most knowledge is reviewed by the Special Master; and (2) actively address a large majority of the foreclosures in the State Judiciary.

We provide the following description of the two-step Special Master Process, which this office recommends as the means by which the Judiciary can most effectively address the issues

raised in the December 20th Order to Show Cause.

1. **A Prima Facie Showing**

The Special Master Process envisions two steps, the first of which requires each Respondent to make a Prima Facie Showing in answer to the following two questions:

A. Does the servicer have processes and procedures in place which, if adhered to, will ensure that the information set forth in affidavits/certification submitted in foreclosure proceedings is personally reviewed by an affiant authorized to act on behalf of the plaintiff in the foreclosure action and that each affidavit or certification submitted is properly executed and is based upon knowledge gained through a personal review of records made in the regular course of business and it was the regular practice of that business to make it?,

and

B. Is the Respondent prepared to follow these processes and procedures upon the resumption of residential mortgage foreclosure activities in New Jersey?

Rec. Stip. ¶ 4

In summary, what the Prima Facie Showing is designed to do is have the Respondent present evidence and information which on its face satisfies the Special Master that the Respondent's processes are designed to prevent any current or future "robo-signing" or other activity that does not ensure the reliability of its sworn submissions to the Judiciary. The sort of information the Special Master will look for during the Prima Facie Showing stage will include information concerning Respondents' authority to act for the mortgagee, an accurate and up-to-date record keeping system; case processing steps that include personal review of documents and records; training programs of Respondents' employees; quality assurance procedures; and processes for effective communication between Respondent and the attorneys handling the foreclosure action. *See* Rec. Stip. ¶ 4(a)-(g).

It is envisioned that this Prima Facie Showing will be made primarily via written submissions to the Special Master, by way of certifications or affidavits. If needed, however, the Special Master will be able to request additional information beyond that initially submitted by each Respondent. The Special Master will also be able to request an in-person presentation by any Respondent if the Special Master deems such necessary. Rec. Stip. ¶ 6.

Once the Special Master determines that any individual Respondent has made the required Prima Facie Showing, the Special Master will convey the same to Your Honor and recommend that Your Honor permit that individual Respondent to resume prosecution of its pending uncontested residential mortgage foreclosure proceedings.⁴ At that time, Respondent will also be required to submit to the Special Master a certification that all uncontested residential mortgage foreclosures prosecution of which are to resume will be prosecuted under the processes outlined in the Prima Facie Showing. Upon approval by Your Honor, the Respondent will then be permitted to resume prosecution of its pending uncontested residential mortgage foreclosure actions. See Rec. Stip. ¶ 6.

2. Subsequent Performance Review

The second step of the recommended Special Master Process is a performance review. See Rec. Stip. ¶ 7. After the resumption of each Respondents' prosecution of its pending uncontested residential mortgage foreclosure actions, the Special Master will be able to review a reasonable sample of files from the Respondents' foreclosure actions, either those pending or newly filed, as

⁴ As part of the Prima Facie Showing, each Respondent will submit a "Servicer Portfolio," which shall list by docket number all of that Respondent's residential mortgage foreclosure matters pending in the Superior Court as of December 20, 2010. Rec. Stip. ¶ 5. The Servicer Portfolio shall indicate whether each matter is contested or uncontested, as defined by Rule 4:64-1(c). See *id*

the Special Master deems necessary (“the Performance Review”). *See* Rec. Stip. ¶ 7. It is recommended that the Special Master’s Performance Review last for twelve (12) months from the date of the respective Respondents’ resumption of prosecuting its pending uncontested residential mortgage foreclosure actions

The purpose of the Special Master’s Performance Review will be to confirm that the processes described by each Respondent in its Prima Facie Showing are being followed. If the Performance Review gives the Special Master a reasonable concern that the processes outlined in the Prima Facie Showing are not being followed, the Special Master shall ask Respondent to address those concerns and may, if needed, request additional information from the Respondent. Ultimately, if the Special Master determines that the processes outlined in the Prima Facie Showing are not being followed, the Special Master may recommend to Your Honor that the Court suspend the particular Respondent’s prosecution of uncontested residential mortgage foreclosure matters until the Respondent confirms to the Special Master’s satisfaction that the processes are in place and operational.

This office believes that this recommended two-step Special Master Process, as described in detail in Paragraphs 4 through 7 of the Recommended Stipulation, serves the goals of the December 20, 2010 Order to Show Cause, while at the same time also permitting the efficient functioning of the foreclosure process, a process necessary for a healthy housing market and the broader economy. First, as outlined above, the Prima Facie Showing will ensure that the Respondents have appropriate processes and checks and balances in place to prevent any future “robo-signing” or other document execution irregularities. Second, the Performance Review will

allow the Judiciary, through the Special Master, to ensure that those processes are being followed. Thus, this office recommends that Your Honor approve the attached Recommended Stipulation and the Special Master Process set forth therein.

II. FURTHER RELIEF OUTLINED IN THE DECEMBER 20TH ORDER TO SHOW CAUSE IS NOT NEEDED AT THIS TIME

Your Honor's December 20, 2010 Order to Show Cause envisioned the possibility of several additional modes of relief beyond the appointment of a Special Master and the payment of fees. Specifically, the Order to Show Cause requested response as to a potential blanket suspension of the processing of pending uncontested residential mortgage foreclosure actions, suspension of the issuance of writs of execution or writs of possession, and the blanket stay of all pending Sheriff's sales of properties where one of the Six Respondents was involved in the mortgage or foreclosure. Dec 20, 2010 Order to Show Cause at ¶ 1 A - 1 C. Additionally, the Order to Show Cause included the possibility of broad-based sanctions on the Six Respondents. *Id.* ¶ 1 D.v. As described below, this office recommends against these additional measures as part of this Order to Show Cause proceeding.

A. A Blanket Suspension of Uncontested Residential Mortgage Foreclosure Proceedings is Not Necessary

This office recommends against the necessity of imposing a blanket suspension of Respondents' uncontested residential mortgage foreclosure proceedings, either those pre-final judgment or those post-final judgment and awaiting Sheriff's sale. As noted above, there has been a *de facto* suspension with regard to Respondents by virtue of their own actions and the Rule Amendments. Going forward, the resumption of processing of the Respondents' pending mortgage

foreclosure portfolios will be governed by the Special Master Process described above. New foreclosures will be subject to the requirements of the Rule Amendments. Additionally, both pending and new foreclosures of the Respondents will be subject to the Special Master's Performance Review as well.

Given these protections, any further order of suspension for these Respondents will serve no purpose. To the contrary, an efficient and normalized mortgage foreclosure process is essential to the health of the New Jersey housing market. Properties tied up in a lengthy and protracted uncontested foreclosure process can potentially remain off the market for well over a year or even longer. This is particularly problematic considering that as much as a quarter of properties in uncontested residential mortgage foreclosure are unoccupied and are thus contributing to blight in New Jersey communities. Thus, it is as important for New Jersey's residential mortgage foreclosure process to function as it is for that process to be based on accurate and legally compliant documents.

B. Broad-based Sanctions Targeted at the Six Respondents Are Unneeded

This office recommends against the imposition of broad-based sanctions on the Six Respondents at this time. First, as noted above, numerous executive and legislative investigations into the residential mortgage foreclosure system are taking place all over the country. If any monetary penalties or other sanctions are appropriate, they are best left to these comprehensive investigations.

Second, court-imposed sanctions are generally designed to address specific misconduct in particular cases. *See, e.g.,* R. 1:10-1, 1:10-2 (sanctions for contempt of court), R. 4:14-7- (sanctions for conducting or defending a deposition in bad faith); R. 4:23-1 (sanctions for failure to make

discovery) In this context, this office recommends that sanctions would be more tailored and more effective if imposed by individual judges in individual residential mortgage foreclosure cases, should they be warranted.

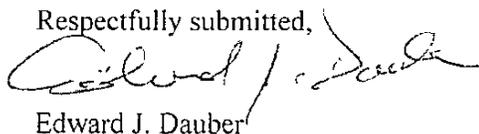
Finally, as provided in the Recommended Stipulation, the Six Respondents have agreed to pay for the services and expenses of the Special Master and this office during the course of the Special Master Process. *See* Rec Stip ¶¶ 2, 14. Thus, the Six Respondents will be paying the costs incurred in assuring the Judiciary of the integrity of Respondents' filings and the expense of the Judiciary's oversight of Respondents' document execution processes during the tenure of the Special Master. For these reasons, this office believes that further punitive sanctions are not needed and recommends against such broad-based sanctions.

CONCLUSION

In conclusion, this office submits the enclosed Recommended Stipulation for Your Honor's consideration and review. We believe that the process set forth in the Recommended Stipulation achieves the goals of the December 20th Order to Show Cause of ensuring the integrity and accuracy of documents filed with the Judiciary in uncontested residential mortgage foreclosure proceedings, while at the same time, permitting the efficient and normalized function of the residential mortgage foreclosure process. Your Honor has scheduled a hearing on the Order to Show Cause for March 29, 2011 at 2:00 p.m., at which I will be prepared to address any questions Your Honor should have about the foregoing or the enclosed Recommended Stipulation.

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Respectfully submitted,



Edward J. Dauber

EJD/tbs
Encls.

cc: Via Facsimile:

Thomas R. Curtin, Esq
Brian Boyle Esq
Gerald Krovatin, Esq
Theodore V. Wells, Jr , Esq
Joyce S. Huang, Esq.
Richard P Haber, Esq.
Jami Wintz McKeon, Esq.
Phillip R. Sellinger, Esq.

Brian P. Brooks. Esq
Elizabeth L. McKeen, Esq.
Andrew Frackman. Esq.
Mark Melodia, Esq
Ian S. Marx, Esq.
Diane Bettino, Esq
Rosemary Alito, Esq.
Robert R. Maddox, Esq.