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MAR 14 2011

WALTER R. BARISONEK, J.S.C. Ret.
SPECIAL MASTER

Robert J Brener
EDWARDS ANGELL PALMER & DODGE LLP
One Giralda Farms
Madison, New Jersey 07940
(973) 520-2300
Attorneys for PNC Bank, National Association

In the Matter of Residential Mortgage Foreclosure
Pleading and Document Irregularities

SUPERIOR COURT OF NEW JERSEY
~~UNION COUNTY~~
**CHANCERY DIVISION, GENERAL
EQUITY PART**

Administrative Order No. 01-2010

Docket No. F-238-11

Hon. Walter R. Barisonek (Special Master)

**NOTICE OF MOTION FOR
ADMISSION *PRO HAC VICE***

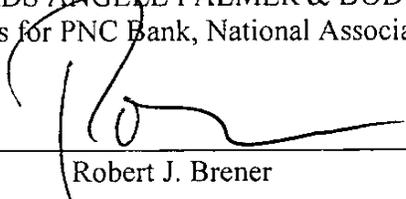
PLEASE TAKE NOTICE that on Friday, April, 1, 2011, at 9.00 a.m. or as soon as counsel may be heard, the undersigned attorneys for PNC Bank, National Association ("PNC") will move before the Hon. Walter R. Barisonek, Superior Court of New Jersey, Union County for an order admitting Richard E. Gottlieb, Esq. and Frederick S. Levin, Esq. *pro hac vice* pursuant to R. 1:21-2(a).

PLEASE TAKE FURTHER NOTICE that PNC will rely upon the annexed Certification of Robert J. Brener, Esq. and the Certifications of Richard E. Gottlieb, Esq. and Frederick S. Levin, Esq. in support of this motion.

PLEASE TAKE FURTHER NOTICE that in accordance with R. 1:6-2, a proposed form of order is annexed hereto.

EDWARDS ANGELL PALMER & DODGE LLP
Attorneys for PNC Bank, National Association

By. _____


Robert J. Brener

Dated: March 10, 2011

Robert J. Brener
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One Giralda Farms
Madison, New Jersey 07940
(973) 520-2300
Attorneys for PNC Bank, National Association

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SUPERIOR COURT OF NEW JERSEY

~~NEW JERSEY:~~

CHANCERY DIVISION, GENERAL
EQUITY PART

Administrative Order No 01-2010

Docket No. F-238-11

Hon. Walter R. Barisonek (Special Master)

**CERTIFICATION OF
ROBERT J. BRENER IN SUPPORT OF
MOTION FOR *PRO HAC VICE***

In the Matter of Residential Mortgage Foreclosure
Pleading and Document Irregularities

I, Robert J. Brener, do hereby certify as follows:

1. I am an attorney-at-law of the State of New Jersey and counsel with the law firm of Edwards Angell Palmer & Dodge LLP, attorneys for PNC Bank, National Association ("PNC"). As such, I am familiar with the facts and circumstances related to this case.

2. I am a member in good standing of the bar of the State of New Jersey as well as the United States District Court for New Jersey.

3. I submit this Certification in support of PNC's motion for the admission *pro hac vice* of Richard E. Gottlieb, Esq. and Frederick S. Levin, Esq. in this matter pursuant to Rule 1:21-2.

4. Richard E. Gottlieb is a Partner of the law firm of Dykema Gossett LLP with offices at 10 South Wacker Drive, Suite 2300, Chicago, Illinois. As set forth in his accompanying certification, Mr. Gottlieb is admitted to practice in the states of New York,

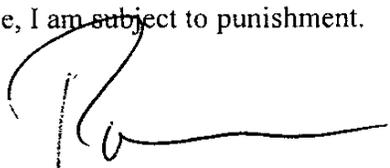
Illinois, and in the District of Columbia. In addition, Mr. Gottlieb is also admitted to practice in a number of federal jurisdictions throughout the country. No disciplinary proceedings are pending against him in any jurisdiction nor has any discipline been imposed against him previously

5. Frederick S. Levin is a Partner of the law firm of Dykema Gossett LLP with offices at 333 South Grand Avenue, Suite 2100, Los Angeles, California. As set forth in his accompanying certification, Mr. Levin is admitted to practice in the states of California, Illinois, and Michigan. In addition, Mr. Levin is also admitted to practice in a number of federal jurisdictions throughout the country. No disciplinary proceedings are pending against him in any jurisdiction nor has any discipline been imposed against him previously.

6. This matter involves factual and legal issues with which Mr. Gottlieb and Mr. Levin are fully familiar. In addition, they have a regular client relationship with PNC and the clients have requested that they work on this matter

7. Pursuant to the terms of New Jersey Court R. 1:21-2, if permission is granted to Richard E. Gottlieb, Esq. and Frederick S. Levin, Esq. to appear in this matter on behalf of PNC, Edwards Angell Palmer & Dodge LLP, through counsel in its New Jersey office, will sign all pleadings, briefs and other papers filed with the court and shall be held responsible for those pleadings, briefs and other papers.

I hereby 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.



ROBERT J. BRENER

Dated: March 10, 2011

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**WALTER R. BARISONEK, A.J.S.C. Ret.
SPECIAL MASTER**

Robert J. Brener
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Madison, New Jersey 07940
(973) 520-2300
Attorneys for PNC Bank, National Association

**In the Matter of Residential Mortgage
Foreclosure Pleading and Document
Irregularities**

Superior Court of New Jersey

Administrative Order No. 01-2010

Docket No: F-238-11

Hon. Walter R. Barisonek (Special Master)

RICHARD E. GOTTLIEB, of full age, certifies as follows:

1. I am an attorney at law and a member of the law firm of Dykema Gossett PLLC, with an office located at 10 South Wacker Drive, Suite 2300, Chicago, Illinois 60606. I am outside counsel for PNC Bank, National Association ("PNC") and submit this certification to the Court in support of my application for admission *Pro Hac Vice* to appear in this matter on behalf of PNC.

2. I am fully familiar with the facts and allegations of this action and PNC has specifically asked me to serve as its counsel in this matter.

3. I am admitted to practice in the states of New York and Illinois, and in the District of Columbia. I am in good standing in each of the foregoing jurisdictions. I am also admitted to practice before and am in good standing in the United States Courts of Appeals for the Seventh, Eighth and Federal Circuits and the United States District Courts for the District of Columbia, the District of Maryland, the Northern District of Illinois (trial bar); the Eastern and Southern

Districts of New York, the Eastern and Western Districts of Michigan, the Eastern District of Wisconsin, and the Northern and Southern Districts of Indiana. No disciplinary proceedings are pending against me in any jurisdiction nor has any discipline been imposed previously.

5 I am not currently a member of the Bar of the State of New Jersey and, accordingly, I am not eligible for plenary admission to this Court.

6 Robert J Brener of Edwards Angell Palmer & Dodge LLP's Madison, New Jersey office, is counsel of record for PNC and, on information and belief, is qualified to practice in the State of New Jersey.

7 I am familiar with the New Jersey Court Rules and I agree to abide by them, including all disciplinary rules.

8 I consent to the appointment of the Clerk of the Supreme Court as agent upon whom service of process may be made for all actions against me or my firm that may arise out of my participation in this matter.

9 I shall notify the Court immediately of any matter affecting my standing in the bar of any other court.

10 All pleadings, briefs, and other papers filed with the Court shall be signed by Mr. Brener or his firm, Edwards Angell Palmer & Dodge LLP.

11 If my admission request is granted, I shall pay the annual fee to the New Jersey Lawyer's Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2, and I will not take any fee in a tort action in excess of that allowed by the New Jersey State Court Contingency Fee Rule 1:21-7, as amended.

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.

A handwritten signature in black ink, appearing to read "Richard E. Gottlieb", is written over a horizontal line. The signature is stylized and cursive.

Richard E Gottlieb

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Superior Court of New Jersey

Administrative Order No. 01-2010

Docket No. F-238-11

Hon. Walter R. Barisonek (Special Master)

Fredrick S. Levin, of full age, certifies as follows:

1. I am an attorney at law and a member of the law firm of Dykema Gossett LLP, with an office located at 333 South Grand Avenue, Suite 2100, Los Angeles, California 90071. I am outside counsel for PNC Bank, National Association ("PNC") and submit this certification to the Court in support of my application for admission *Pro Hac Vice* to appear in this matter on behalf of PNC.

2. I am fully familiar with the facts and allegations of this action and PNC has specifically asked me to serve as its counsel in this matter.

3. I am admitted to practice in the states of California, Illinois, and Michigan. I am in good standing in each of the foregoing jurisdictions. I am also admitted to practice before, and am in good standing in, the United States Courts of Appeals for the Sixth, Seventh, Eighth, and Ninth Circuits, and, the United States District Courts for the Northern District of Illinois, the Eastern District of Michigan, and in all of the federal judicial districts in California. No

disciplinary proceedings are pending against me in any jurisdiction nor has any discipline been imposed previously.

5 I am not currently a member of the Bar of the State of New Jersey and, accordingly, I am not eligible for plenary admission to this Court.

6. Robert J. Brener of Edwards Angell Palmer & Dodge LLP's Madison, New Jersey office, is counsel of record for PNC and, on information and belief, is qualified to practice in the State of New Jersey.

7 I am familiar with the New Jersey Court Rules and I agree to abide by them, including all disciplinary rules.

8. I consent to the appointment of the Clerk of the Supreme Court as agent upon whom service of process may be made for all actions against me or my firm that may arise out of my participation in this matter.

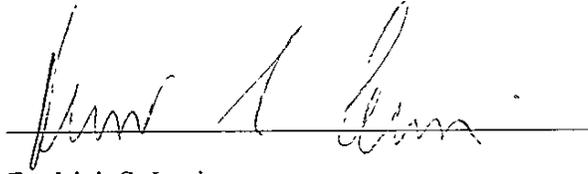
9 I shall notify the Court immediately of any matter affecting my standing in the bar of any other court.

10. All pleadings, briefs, and other papers filed with the Court shall be signed by Mr Brener or his firm, Edwards Angell Palmer & Dodge LLP.

11. If my admission request is granted, I shall pay the annual fee to the New Jersey Lawyer's Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2, and I will not take any fee in a tort action in excess of that allowed by the New Jersey State Court Contingency Fee Rule 1:21-7, as amended

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.

March 9, 2011

A handwritten signature in cursive script, appearing to read "Fredrick S. Levin", is written over a horizontal line.

Fredrick S. Levin

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