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**REPLY TO NEW JERSEY ADDRESS**

FOUNDED IN 1923  
AS ZUCKER & GOLDBERG

MAURICE J. ZUCKER (1918-1979)  
LOUIS D. GOLDBERG (1923-1967)  
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August 19, 2011

(VIA Lawyers Service and Electronic Filing via JEFIS and E-mail)  
Honorable Walter R. Barisonek, Special Master  
Union County Courthouse  
Courtroom 101  
2 Broad Street  
Elizabeth, N.J. 07207

RE: Supplemental Submission of American Home Mortgage Servicing, Inc. in response to the  
Honorable Walter Barisonek's April 25, 2011 Letter

Docket No.: F-238-11

Dear Judge Barisonek:

Our firm represents American Home Mortgage Servicing, Inc. in relation to the above captioned  
Administrative Order. While AHMSI is not a party to the Administrative Order, it has been asked by  
U.S. Bank National Association to respond to Your Honor's April 25, 2011.

Enclosed please find the Supplemental Certification of Elizabeth Boulton.

Should Your Honor have any questions or concerns, please do not hesitate to contact us.

Respectfully submitted,

  
Brian C. Nicholas, Esq.

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Attorneys for American Home Mortgage Servicing, Inc.

IN THE MATTER OF RESIDENTIAL  
MORTGAGE FORECLOSURE PLEADING  
AND DOCUMENT IRREGULARITIES

Superior Court of New Jersey  
Administrative Order 01-2010  
Docket No.: F-238-11

**SUPPLEMENTAL CERTIFICATION  
OF  
ELIZABETH BOULTON**

I, Elizabeth Boulton, hereby certify that:

1. I am a Vice President of Default Administration for American Home Mortgage Servicing, Inc. (hereinafter "AHMSI"). I have been employed by AHMSI since February 2009. I have been employed in the mortgage servicing industry since 1990. Since 1995 I have been involved in the management of both foreclosure and bankruptcy departments. In this capacity I have personal knowledge of, and am fully familiar with, AHMSI's foreclosure operations as they relate to the State of New Jersey. I submit this supplemental certification in support of my June 10, 2011 certification.

2. When a loan is delinquent and foreclosure is necessary, our Foreclosure Review Department conducts a final review of the loan to ensure that foreclosure is appropriate. Upon completion of the review, they enter a foreclosure code into MSP. Once a day, an automated script is run that opens the foreclosure in MSP and it is flagged for LPS Desktop to retrieve and refer the loan to foreclosure counsel.<sup>1</sup> The loan level financial information (including but not limited to the interest rate, borrower information, default date, principal balance on the loan, etc.) and copies of the mortgage documents are forwarded to foreclosure counsel.<sup>2</sup> A historic record of the information sent to foreclosure counsel will be retained in the LPS system.
3. Foreclosure counsel will run a title search on the subject property and then prepare the foreclosure complaint. Once the complaint is drafted, foreclosure counsel uploads the complaint as well as all supporting documents to AHMSI through LPS Desktop. Foreclosure counsel will also upload a complaint checklist that is to be completed by AHMSI and returned to counsel.
4. The complaint package containing printouts of all of the documents uploaded by foreclosure counsel are printed and forwarded to the associate assigned to the file will retrieve the foreclosure complaint and complaint checklist from LPS Desktop. The foreclosure associate verifies the complaint against our business records, including our system of record, MSP. For any of the facts that are not contained in MSP, the

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<sup>1</sup> After the loan is referred to local foreclosure counsel, a different foreclosure associate will be assigned to the loan. That foreclosure associate will be responsible for the day-to-day monitoring of the foreclosure and will be the individual executing certifications for that loan.

<sup>2</sup> As explained in my previous certification, LPS Desktop is a secure web portal that AHMSI utilizes to communicate with foreclosure counsel. LPS Desktop maintains a history of the files and messages sent back and forth between AHMSI and our foreclosure counsel.

supporting documentation like the mortgage, note, assignment, or other similar document are used to verify the data.

5. The foreclosure associate will review the complaint line-by-line to confirm that our business records support the factual assertions made in the complaint. If the foreclosure associate is unable to verify any fact, the complaint is returned to the attorney for the appropriate clarification or modifications.
6. Upon verification that the facts contained in the complaint are accurate, the foreclosure associate will execute the checklist and return the checklist and complaint to foreclosure counsel to complete the Certification of Diligent Inquiry under the new court rules.
7. Similarly, when the foreclosure has progressed to the stage where a Certification of Proof of Amount Due is needed, our foreclosure counsel will request final judgment figures from AHMSI through LPS Desktop. The foreclosure associate will run a script that automatically collects the final judgment figures<sup>3</sup> from our system of record and uploads them to our foreclosure counsel.
8. Once foreclosure counsel prepares the Certification of Proof of Amount Due, they upload it to AHMSI through LPS Desktop along with a certification checklist. The documents, including the Certification, Fact Verification Checklist and attorney checklist, and other supporting documents, are printed and delivered to the foreclosure associate assigned to the loan.
9. The foreclosure associate first confirms that the data in our system of record matches the data that was forwarded to our foreclosure counsel to ensure that payments were not received while the certification was being prepared.

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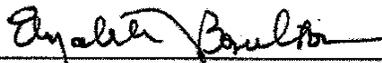
<sup>3</sup> This includes the outstanding principal balance of the loan, accrued interest, escrow advances, late charges, and any other amounts that are due from the borrower on the loan.

10. The foreclosure associate then utilizes the checklists to conduct a line-by-line review of the certification to ensure that each fact is supported by our business records. The Fact Verification Checklist is utilized for all loan level data. For any data that is not on the Fact Verification Checklist, the foreclosure associate utilizes the mortgage, note, assignment, or other printed attachment to the package to validate the data.
11. Only after confirming the data in the certification matches our business records will the foreclosure associate execute the certification and sign the checklist. The checklist and signed certification are mailed to our foreclosure counsel.
12. We then expect foreclosure counsel will complete the Certification of Diligent Inquiry as required by the new court rules and file same with the Certification of Proof of Amount Due and file the application for entry of final judgment.
13. As a servicing agent for third parties, AHMSI is authorized to execute documents on behalf of securitized trusts, FannieMae, FreddieMac, and private investors through Pooling and Servicing Agreements or powers of attorney. AHMSI maintains a matrix listing our ability to execute documents on behalf of our clients. AHMSI has delegated the ability to execute documents on behalf of AHMSI to our foreclosure associates.
14. Each associate is familiar with the location that the matrix is located and in the event they need to verify they have authority to execute documents for a particular entity, they verify the authority to sign.
15. Once a loan goes into foreclosure, AHMSI generally does not accept partial payments that are insufficient to cure the entire default unless the payment is part of a loss mitigation agreement or bankruptcy proceeding.

16. In regard to our internal audits, we maintain a quality control team in the foreclosure support department that conducts an audit of document execution procedures every month. A random sample of ten documents per foreclosure associate is reviewed per week. The audit includes but is not limited to: (1) review of documents rejected by associates to ensure they were properly rejected and to try to track common errors to enhance our procedures; (2) review of the execution to ensure it was done properly and that the associate was authorized to execute the document; and (3) if the document was executed, review of our business records to confirm that the associate utilized the appropriate checklist and completed same.

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: 8/19/14

  
Elizabeth Boulton