

BROWN & CONNERY, LLP
Paul Mainardi, Esquire
Susan Leming, Esquire
360 Haddon Avenue
Westmont, New Jersey 08302
(856) 854-8900
Attorneys for TD Bank, N.A.

**IN THE MATTER OF RESIDENTIAL
MORTGAGE FORECLOSURE
PLEADING AND DOCUMENT
IRREGULARITIES**

**Docket No. F-238-11
Administrative Order 01-2010**

**CERTIFICATION OF
FACSIMILE SIGNATURE OF
CATHERINE MORTON
ON BEHALF OF TD BANK, N.A.
PURSUANT TO R.1:4-4(C)**

I hereby certify that the facsimile signature of Catherine Morton on the attached Second Supplemental Certification of Catherine Morton on Behalf of TD Bank, N.A. In Response To Request For Information is genuine. I further certify that a copy of the document with the original signature shall be provided upon request by the Court or by a party to this matter

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

BROWN & CONNERY, LLP
Attorneys for TD Bank, N.A.

By:


Paul Mainardi

Dated: September 6, 2011

BROWN & CONNERY, LLP
Paul Mainardi, Esquire
Susan Leming, Esquire
360 Haddon Avenue
Westmont, New Jersey 08302
(856) 854-8900
Attorneys for TD Bank, N.A.

**IN THE MATTER OF
RESIDENTIAL MORTGAGE
FORECLOSURE PLEADING AND
DOCUMENT IRREGULARITIES**

**Docket No. F-238-11
Administrative Order 01-2010**

**SECOND SUPPLEMENTAL
CERTIFICATION OF CATHERINE
MORTON ON BEHALF OF
TD BANK, N.A.
IN RESPONSE TO REQUEST FOR
INFORMATION**

Catherine Morton, of full age, certifies as follows:

1. I am employed by TD Bank, N.A. ("TD Bank") as Vice President and Collections Group Manager. I have personal knowledge of the facts set forth in this certification ("Supplemental Certification") based on my years of hands-on work experience with the pertinent processes and operations of TD Bank in this area and my familiarity with, and review of, pertinent business records of TD Bank that are maintained by TD Bank in the regular course of its business. I am authorized by TD Bank to make this Second Supplemental Certification to supplement my prior certifications dated June 9, 2011 and July 29, 2011, filed

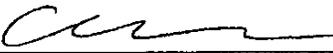
in this matter, and to respond to the request for additional information in the letter of the Honorable Walter B. Barisonek dated August 2, 2011.

2. The number of default foreclosure matters reviewed by a loss mitigation specialist each day is difficult to determine with reasonable certainty because a loss mitigation specialist's "reviews" of these matters range in depth from a review of a particular fact or document to a more comprehensive review of the matter in anticipation of communication between the loss mitigation specialist and foreclosure counsel. The average number of comprehensive reviews of default foreclosure matters by a loss mitigation specialist in connection with R. 4:64-1 or R. 64-2 submissions to attorneys is estimated to be approximately two (2) per day.

3. TD Bank's loss mitigation specialists do not use checklists for R. 4:64-1 or R. 64-2 submissions to attorneys.

4. The TD Bank officer who reviews the loss mitigation specialist's submission is provided with screen shots of the loan servicing system and loan documents in hard copy form or in the form of electronic scans of hard copies.

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.



Catherine Morton

September 2
Dated: August ____, 2011

BROWN & CONNERY LLP

ATTORNEYS AT LAW AND PROCTORS IN ADMIRALTY
6 NORTH BROAD STREET
WOODBURY, NEW JERSEY 08096

TELEPHONE: (856) 812-8900
FACSIMILE: (856) 853-9933
www.brownconnery.com

STEVEN G WOLSCHINA
PAUL MAINARDI
MICHAEL J VASSALOTTI
WILLIAM M TAMBUSSI
MARK P ASSELTA*
STEPHEN J DEFEO*
JOSEPH M NARDI, III*
CHRISTINE P O'HEARN*
JOSEPH T CARNEY**
KAREN A MCGUINNESS*
SUSAN M LEMING*
SHAWN C HUBER*
LOUIS R LESSIG*
JOSEPH M GAREMORE*
JEFFREY R JOHNSON*

COUNSEL
JOHN E WALLACE, JR

OF COUNSEL
KATHIE L RENNER*
MICHAEL R MIGNOGNA*
JOSEPH G ANTINORI
CARL J GREGORIO-

THOMAS F CONNERY JR. (1915-2004)
HORACE G BROWN (1902-1990)
HOWARD G KULP JR (1906-1987)

WESTMONT, NJ 08108 CAMDEN, NJ 08102 PHILADELPHIA, PA 19102
(856) 854-8900 (856) 365-5100 (215) 592-4352

September 6, 2011

MICHELLE H BADOLATO**
COLLEEN P BEZICH*
WILLIAM F COOK*
MICHAEL J DIPIERO*
ABIGAIL M GREEN*
JENNIFER A HARRIS
PATRICK J HOLSTON*
DIANE S KANE*
JANINE M LLOYD*
DONALD K LUDMAN
KEITH C MALCARNEY
BETH L MARLIN*
PAMELA A MULLIGAN
ERIC D MILAVSKY*
MICHAEL J MILES*
CHRISTOPHER A ORLANDO*
GINA M ROSWELL*
KENNETH J SCHWEIKER JR -
MICHAEL J WATSON*

* ALSO ADMITTED IN PENNSYLVANIA
* ALSO ADMITTED IN NEW YORK
* ALSO ADMITTED IN DELAWARE
* ALSO ADMITTED IN MARYLAND
* CERTIFIED BY THE SUPREME
COURT OF NEW JERSEY AS
CIVIL TRIAL ATTORNEY
* CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS WORKERS
COMPENSATION LAW
ATTORNEY

Our File No 11-0029

VIA FEDERAL EXPRESS

Honorable Walter Barisonek, Special Master
UNION COUNTY COURTHOUSE
Two Broad Street - Courtroom 101
Elizabeth, New Jersey 07207

Re: Administrative Order 01-2010
Docket No. : F-238-11

Dear Judge Barisonek:

I am enclosing a copy of Second Supplemental Certification of Catherine Morton on Behalf of TD Bank, N.A. In Response to Request For Information dated September 2, 2011, and my facsimile signature certification.

I look forward to meeting with Your Honor in your new chambers on Thursday, September 13, 2011, at 10:00 AM

Respectfully submitted,

BROWN & CONNERY, LLP



Paul Mainardi

Enclosures

cc Clerk, Superior Court of New Jersey (w/enclosures) (via email)