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# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Civ. No. 2:16-cv-05301-ES-JAD

VERONICA A. WILLIAMS,

Plaintiff,

v.

LITTON LOAN, et al.,

Defendants.

# RESPONSE TO TWO BRIEFINGS IN OPPOSITION REPRESENTING

# ALL DEFENDANTS

**PLAINTIFF’S RESPONSE TO BRIEFINGS IN OPPOSITION FROM:**

[**BRIEFING 1**](http://finfix.org/proof/ADDL/Seiden_Williams-Opposition-to-Motion-for-Default-Judgment-Filed-1-3-17.pdf)**: Litton Loan Servicing, HSBC Bank USA, Goldman Sachs, Ocwen, Fremont Home Loan trust 2006-C Mortgage-Backed Certificates Series 2006-C &** [**BRIEFING 2**](http://finfix.org/proof/ADDL/EB_ECF_S%26E-Opposition-to-Motion-for-Default_1-7-17.pdf)**. Stern & Eisenberg**

The Defendants continue to ignore the counts in the Plaintiff’s complaint by failing to present or discuss a solution that addresses their actions (see Exhibits [I](http://finfix.org/proof/ADDL/Seiden_Previous-Loan-Modification-Proposal_Redacted.pdf) & [II](http://finfix.org/proof/ADDL/EBarenbaum-STERN-EISENBERG_Response-VW_Redacted.pdf)). A trial is long overdue and should be scheduled as soon as witnesses can confirm dates that they can attend.

The job of the groups of attorneys, and others, working for the defendants is to protect the defendants from the consequences of their wrongdoings. They have invested tremendous hours over more than eight (8) years to this end, on this case alone. The Plaintiff’s intention, on the other hand, is to clearly prove the defendants’ wrongdoing by shining a light on fraudulent and deceptive actions and systemic, unscrupulous practices. The Plaintiff is prepared to explain the complexities of this case to a jury of her peers. The Plaintiff trusts she will be able to do so in this, the 11th year, of this travesty. The Plaintiff’s vast documentation and esteemed witnesses will explain why and how the defendants are guilty of each count. The Plaintiff was taught to stand in her own truth. This is the first, and hopefully last, time that she feels compelled to present her case in front of a jury.

 At trial the Plaintiff shall connect the dots and explain every element of this case for a jury. The magnitude of the defendants’ destructive actions will show why the defendants have fought the Plaintiff so hard, and for so long.

There were several improprieties during the 8 years that the Plaintiff has tried to seek justice through the New Jersey Court system:

* Defendants failed to show up at September 2010 Court Hearing
* Notice of Appeal sent by certified mail to the NJ Supreme Court and to former attorney for all defendants, Mr. Seiden of Duane Morris, “went missing”. Neither recipient has returned the mail nor acknowledged receipt. The money orders sent to the NJ Supreme Court and the NJ Superior Court are still missing.
* Virtually all Hearings were held without the Plaintiff’s knowledge or input, as required by the Rules of the NJ Superior Court.
* Plaintiff was denied mediation.
* The “Rescheduled trial” appears to have been a tactic to have case dismissed.
* Plaintiff’s counsel withdrew at a critical time.
* A NJ Judge refused to allow Plaintiff to attend a major hearing; yet, over her objections allowed counsel who had withdrawn from the case to represent her.
* These and additional actions will be presented at trial.

CONCLUSION

The Defendants misled the Plaintiff and defrauded her out of her home’s equity. Over the ensuing 10 years, the defendants spent an inordinate amount of time and money to avoid accountability for their actions. As a result, damages to the Plaintiff continued to escalate. For the foregoing reasons, the Plaintiff moves the Court to proceed with a trial. Since Plaintiff has been unsuccessful in scheduling trial dates with the defendants, the Plaintiff asks the Court to hold a scheduling conference call between the Plaintiff and Defendants’ attorneys to schedule the trial. A proposed judgment is attached to this motion.

Respectfully submitted,

Veronica A. Williams

Per Se Counsel StopFraud@vawilliams.com

/s/ Veronica A. Williams

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January 10, 2017 (202) 486-4565

**EXHIBIT I**



**EXHIBIT I cont’d.**



**EXHIBIT I cont’d.**



**EXHIBIT I cont’d.**



**EXHIBIT II**



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Plaintiff,

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Defendants.

**CERTIFICATION OF SERVICE**

I, Veronica Williams, certify that on this 10th day of January 2017, a true and correct copy of the Response to Briefings in Opposition was served upon the parties below via U.S. Certified Mail addressed to:

|  |  |
| --- | --- |
| **Via U.S. Certified Mail & via Email** Stuart I. Seiden, AssociateAttorney for Litton Loan Servicing, HSBC Bank USA, Goldman Sachs, Ocwen, Fremont Home Loan trust 2006-C Mortgage-Backed Certificates Series 2006-CDuane Morris LLP30 South 17th StreetPhiladelphia, PA 19103-4196Phone (215) 979-1124Fax (215) 827-5536siseiden@duanemorris.com  | **Via U.S. Certified Mail & via Email**Evan Barenbaum, Esq Attorney for Stern & EisenbergDirector of LitigationStern & Eisenberg, PC1581 Main Street, Suite 200Warrington, PA 18976Office 267-620-2130 Cell 215-519-2868Fax 215-572-5025ebarenbaum@sterneisenberg.com |
| Email is not considered received until recipient replies with a message. |

Respectfully submitted,

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