



1581 Main Street
Suite 200
Warrington, PA 18976
Office: (215) 572-8111
Facsimile: (215) 572-5025

www.sterneisenberg.com
Direct Dial (267) 620-2130
Ebarenbaum@sterneisenberg.com

December 14, 2016

The Honorable Esther Salas
United States District Court
District of New Jersey
50 Walnut Street
Newark, NJ 07101

**Re: *Veronica A. Williams v. Litton Loan Servicing, et al.*,
USDC NJ, 2:16-cv-05301-ES-JAD**

Dear Judge Salas:

We represent Defendant Stern & Eisenberg, P.C. (“**S&E**”) in connection with the above matter. A response to Plaintiff’s Complaint is due by December 23, 2016, pursuant to the Court’s Order granting S&E’s request for an extension of time. The prior extension of time was requested because Plaintiff did not serve any of the exhibits along with the Complaint. Further, the exhibits are not available on PACER, as the docket indicates that the Complaint was filed “w/voluminous exhibits, see Court file”. Consequently, our office contacted the Clerk to determine how we could obtain copies of the exhibits, but no instruction was received. Therefore, we personally appeared at the Clerk’s Office today, where our associate attorney conferred with Eric Underwood, Supervisor of In-Court-Activities. Mr. Underwood indicated that the file containing the exhibits could not yet be found. Given the absence of the exhibits, S&E is prejudiced and cannot meaningfully respond to the Complaint.

Respectfully, S&E requests a thirty-day extension of time to respond to the Complaint, such that it may obtain the exhibits and file a meaningful response. A proposed form of order accompanies this application.



Consent to the extension was provided by counsel for Litton Loan Servicing, HSBC Bank USA, N.A., Goldman Sachs, and Ocwen. A voicemail was left for Plaintiff, requesting her consent to the extension, but no response has yet been received.

Respectfully submitted,

/s/Evan Barenbaum

cc: Veronica A. Williams
Stuart I. Seiden

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

VERONICA A. WILLIAMS,

Plaintiff,
v.

LITTON LOAN SERVICING, et al.

Defendants

Civil Action Number:

2:18-cv-05301-ES-JAD

ORDER

AND NOW, this _____ day of _____, 2016,
upon consideration of Defendant Stern & Eisenberg, P.C. Application for Extension of Time to
Respond to Complaint, and any response thereto, it is hereby **ORDERED** and **DECREED** that
the Application is **GRANTED**. Defendant Stern & Eisenberg, P.C. shall respond to the
Complaint by January 22, 2017.

ESTHER SALAS
UNITED STATES DISTRICT JUDGE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

VERONICA A. WILLIAMS,

Plaintiff,
v.

LITTON LOAN SERVICING, et al.,

Defendants.

Civil Action Number:

2:16-cv-05301-ES-JAD

CERTIFICATION OF SERVICE

I, Evan Barenbaum, Esquire, on this 14th day of December, 2016, being duly sworn according to law, depose and say that a true and correct copy of Application for Extension of Time to Respond to Complaint was served upon all parties via ECF, and as indicated below:

Veronica A. Williams
P.O. Box 978
South Orange, NJ 07079-0978

STERN & EISENBERG, PC

BY: /s/Evan Barenbaum
Evan Barenbaum, Esquire
Attorney for Defendant