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

<p>VERONICA A. WILLIAMS,</p> <p>Plaintiff,</p> <p>v.</p> <p>LITTON LOAN, et al.,</p> <p>Defendants.</p>

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

**RESPONSE TO STERN &
EISENBERG'S MOTION TO
DISMISS**

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 U.S. DISTRICT COURT
 DISTRICT OF NEW JERSEY
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**PLAINTIFF'S RESPONSE TO STERN & EISENBERG'S MOTION TO DISMISS
ONE OF FIVE DEFENDANTS: Litton Loan Servicing, HSBC Bank USA, Goldman
Sachs, Ocwen, Stern & Eisenberg, Fremont Home Loan trust 2006-C Mortgage-
Backed Certificates Series 2006-C**

The Plaintiff accepts Stern & Eisenberg as a law firm that represents financial firms and is "loyal to our clients and passionate about our work"¹ and strives to represent "its clients with both integrity and intensity "². That does not obviate this firm's responsibility to treat its adversaries with honesty and integrity. Rather, in this case the firm has a greater responsibility to honor the American Bar Association's (ABA) Code of Conduct Rule 4.3³:

Rule 4.3 Dealing With Unrepresented Person

In dealing on behalf of a client with a person who is not represented by counsel, a lawyer shall not state or imply that the lawyer is disinterested. When the lawyer knows or reasonably should know that the unrepresented person misunderstands the lawyer's role in the matter, the lawyer shall make reasonable efforts to correct the misunderstanding. The lawyer shall not give legal advice to an unrepresented person, other than the advice to

¹ Source: <http://sterneisenberg.com/who-we-are/>

² Ibid.

³ See American Bar Association Rules of Professional Conduct

http://www.americanbar.org/groups/professional_responsibility/publications/model_rules_of_professional_conduct/rule_4_3_dealing_with_unrepresented_person.html

secure counsel, if the lawyer knows or reasonably should know that the interests of such a person are or have a reasonable possibility of being in conflict with the interests of the client.

Although the Plaintiff does not have access to the vast resources available to the two groups of lawyers representing the defendants, she has searched and has not found any case like this one. That is, where multiple financial institutions have expended immeasurable resources for over 11 years to commit and protect themselves from a trial exposing their clearly fraudulent acts. The charges against the defendants are clear given the evidence presented in documents submitted (see <http://www.fifix.org/US-Case-No-2-16-cv-05301-ES-JAD.pdf>). The charges are corroborated by billions of dollars paid to the Federal government citing what they did to this Plaintiff and others, but not “admitting guilt”. The defendants’ effort against this lone Plaintiff has included at least 3 law firms, repeated denial of due process in the New Jersey State Courts and more. The overwhelming evidence filed with this U.S. District Court proves this case is beyond any case that this Plaintiff can find or likely exists. This case must be considered in its entirety for a proper and thorough evaluation. The interrelationships and congruencies of the defendants’ actions mandate a review of this case in its entirety. Comparisons on a single element to other cases do not constitute a fair and proper evaluation.

Each of the cases cited by Stern & Eisenberg, Duane Morris and any other law firms representing the defendants will be reviewed – if necessary – by the Plaintiff after the case documents for these citations have been found or made available to the Plaintiff.

Several of the Plaintiff’s witnesses from the legal, business and local New Jersey communities will validate the charges posed by the Plaintiff, from improper collection to fraud and other counts. Some will also refute the words entered into Court records by Mr. Lambropoulos and by Mr. Seiden (see Exhibit I). Many will also explain the effect that such defamation has on the Plaintiff’s firm and career.

The defendants lack grounds for invoking Federal Rule of Civil Procedure 12(b)(2), Lack of Personal Jurisdiction. This Plaintiff has established – by a preponderance of the evidence presented in this case – that jurisdiction by the U.S. District Court is proper.

While the *stream of commerce* is not needed to effectively argue jurisdiction, the Plaintiff's case will show how at least 4 countries and 6 U.S. states were involved in the distribution and processing of financial instruments that constituted the fraud and unfair collection by the defendants. Their actions culminated in New Jersey. At the time of the deception, all defendants involved had operations in New Jersey. Ocwen, based in Florida, assumed the mortgage and perpetuated what the defendants had begun.

Jurisdiction should remain with the U.S. District Court for several reasons. This response focuses on two reasons⁴:

- Due Process
- Reasonableness

Due Process

The arguments for lack of jurisdiction presented by Mr. Barenbaum, and by Mr. Seiden in the other defendants' Motion to Dismiss, lack valor because the legal effort in the New Jersey Courts was not legitimate. The New Jersey Courts violated the Plaintiff's rights granted by the 5th and 14th Amendments to the U.S. Constitution. The rules of the NJ Courts were broken over and over: documents sent by the U.S. Postal Service via Certified Mail were "lost"; hearings were held without the knowledge or participation of the Plaintiff or her attorney; and more. The legal effort in the New Jersey Courts lacked legitimacy for several reasons⁵ including, but no limited to:

- **Judge Cocchia removed defendants without Plaintiff's knowledge or input. This decision has proven to be wrong.**

⁴ Challenging Personal Jurisdiction: A Guide to the Procedure and Standards for Dismissing Lawsuits for Lack of Personal Jurisdiction, by Bryan J. Hung and Brian Myers, TTL, December 2014, Vol. 16, No. 3

⁵ See PDF Case files and other documents at <http://www.fifix.org/US-Case-No-2-16-cv-05301-ES-JAD.pdf>

- **Judge Mitterhoff denied Plaintiff to attend a hearing on the Plaintiff's case but mandated her previous attorney represent her against her objection and *after* the attorney had filed a document with the New Jersey Court to formally withdraw.**
- **Mediation was denied.**
- **No one showed up for the defendants at the September 2010 hearing presided over by Judge Rothschild.**
- **Appeals and other legal documents "went missing" despite proof of delivery from the U.S. Postmaster General and Federal Express. The State of New Jersey and the defendants' lawyer still have not explained nor confirmed what happened to the appeal documents sent via US certified mail.**
- **Two money orders "went missing" despite proof of delivery to the NJ Courts.**
- **Plaintiff was denied the opportunity to argue all 6 counts⁶ against all 7 defendants⁷.**
- **Plaintiff was granted only one opportunity to argue one count against one defendant.**
- **Subsequent hearings held without Plaintiff's knowledge or presence – again, against Court rules.**

Each of these points are documented in the case files (see <http://www.fifix.org/US-Case-No-2-16-cv-05301-ES-JAD.pdf>).

Reasonableness

Reasonableness. Moving this case outside of the U.S. District Court of New Jersey would offend "traditional notions of fair play and substantial justice"⁸. Challenging Lack of Jurisdiction is a classic legal tactic used by defendants working to exhaust a Plaintiff's resources to prevent them from reaching trial. This Plaintiff does not have the deep pockets of the defendants and should not be forced into additional, unnecessary discovery and litigation. All parties have conducted and concluded discovery. It is neither fair nor reasonable engage in matters that do not go to the merits

⁶ See PDF page 3,327 & 3,328 of Case documents at <http://www.fifix.org/US-Case-No-2-16-cv-05301-ES-JAD.pdf>

⁷ See PDF page 1,638 of Case documents at <http://www.fifix.org/US-Case-No-2-16-cv-05301-ES-JAD.pdf>

⁸ *International Shoe Co. v. Washington*, 326 U.S. at 326 U. S. 316, quoting *Milliken v. Meyer*, 311 U.S. at 311 U. S. 463.

of the underlying claims. It is time for a trial in the U.S. District Court of New Jersey. The reasonableness analysis requires the court to evaluate five factors⁹:

1. burden
2. interests of forum
3. Plaintiff's interests
4. efficient resolution
5. furthering fundamentals

BURDEN. The defendants' attorneys are located closer to New Jersey than Washington, DC. At least 4 of 5 defendants had locations in or near New Jersey when the Plaintiff's legal effort began. Over the 11 years of fraud and the ensuing legal battles, the defendants have driven the Plaintiff to public assistance and have damaged her health. The defendants have ample resources to present their defense in the U.S. District Court of New Jersey. Moreover, they will not incur the added costs of travel and other expenses required by moving this matter to the U.S. Supreme Court. It is an unfair burden, and impossible, for the Plaintiff to present her case in DC instead of NJ. Several witnesses would not be able to appear in person; a jury of the Plaintiff's peers is not available outside of NJ; and travel to DC is a danger to the Plaintiff's health and finances.

INTERESTS OF FORUM. New Jersey leads the country in foreclosures. This case demonstrates how homeowners lose their homes, often their greatest investment, due to fraud by banks and affiliated financial firms. There have been numerous bills introduced to the New Jersey legislature over the past several years. In the 2016 – 2017 legislative year alone, there are more than *39 bills in just one relevant category*. Other bills are in different categories. (see Exhibit II). It is clearly in the best interest of New Jersey citizens to have this case adjudicated in the U.S. District Court of New Jersey.

PLAINTIFF'S INTERESTS. The Plaintiff's ability to earn a sustainable income and her health depend on presenting her case before a jury of her peers. This is evidenced throughout the case documents and will be reaffirmed by witnesses domiciled in New Jersey.

⁹ Challenging Personal Jurisdiction: A Guide to the Procedure and Standards for Dismissing Lawsuits for Lack of Personal Jurisdiction, by Bryan J. Hung and Brian Myers, TTL, December 2014, Vol. 16, No. 3

EFFICIENT RESOLUTION. The most efficient resolution can only be obtained in the U.S. District Court of New Jersey. The Plaintiff would like a trial before this matter enters its 12th year.

FURTHERING FUNDAMENTALS. Fraud and other improper actions by select banks and financial institutions have devastated our economy and the lives of millions of citizens. THIS MUST STOP. Hearing this case in the U.S. District Court of New Jersey will, without a doubt, further “**fundamental substantive social policies**”. *World-Wide Volkswagen*, 444 U.S. at 444 U.S. 292 (citations omitted). **(Ref #46 in article, p. 49)**. The herculean efforts of New Jersey lawmakers to introduce bills and pass laws to reduce the unacceptably high level of foreclosures (see Exhibit II) validates our State’s “fundamental substantive social policies”. So does the substantive law behind the Plaintiff’s claims¹⁰.

The items listed above and other actions documented in the case files demonstrate that the legal process of the cases against these defendants in the New Jersey Courts:

- **Lacks Legitimacy**
- **Denied the Plaintiff’s Constitutional Right a Trial by a Jury of Her Peers**
- **Violated Plaintiff’s Fifth¹¹ and Fourteenth¹² U.S. Constitutional Rights to Due Process**

A trial by jury of the Plaintiff’s peers can only be conducted fairly at the U.S. District Court of New Jersey. The travel and other costs to witnesses and the Plaintiff are not tenable in the District of Columbia nor any other location outside of the geographic boundary of the U.S. District Court of New Jersey.

If additional time is granted to respond to the defendant’s Motion to Dismiss, the Plaintiff will explain the difference between each case cited by Mr. Barenbaum and the Plaintiff’s case. If necessary, the Plaintiff reserves the right to submit additional arguments at a hearing.

¹⁰ See PDF pages 35 – 38 of Case documents at <http://www.fifix.org/US-Case-No-2-16-cv-05301-ES-JAD.pdf>

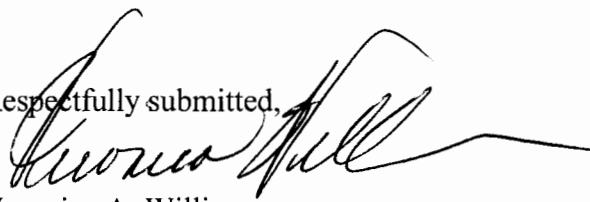
¹¹ U.S. Constitution Amendment V excerpt – **No person shall be deprived of life, liberty, or property, without due process of law;** https://www.senate.gov/civics/constitution_item/constitution.htm

¹² U.S. Constitution Amendment XIV – All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside. **No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law;** nor deny to any person within its jurisdiction the equal protection of the laws. https://www.senate.gov/civics/constitution_item/constitution.htm Alternate Site

IN CONCLUSION

The defendants continue their effort, now in its 11th year, to exhaust the Plaintiff's resources rather than attempting to reach a fair and equitable resolution. The New Jersey Courts have repeatedly denied the Plaintiff due process. It is neither fair nor reasonable to move this matter to the U.S. Supreme Court. The Plaintiff requests that the Court deny Defendant's Motion to Dismiss and schedule a jury trial.

Respectfully submitted,



Veronica A. Williams
Pro Se Counsel StopFraud@vawilliams.com

/s/ Veronica A. Williams
StopFraud@vawilliams.com
(202)486-4565

February 4, 2017

EXHIBIT I

LAMBROUPOULOUS DEFAMATION (Foreclosure Attorney)

<http://www.fifix.org/US-Case-No-2-16-cv-05301-ES-JAD.pdf> PP. 141 – 144

Lambroupoulos is an attorney for Stern & Eisenberg who changed the hearing before former NJ Judge Harriet Klein just before she left the bench, just after my attorney pulled out unofficially (he did not file papers until 3 months later), and before my case against the banks was settled. The foreclosure was not supposed to be heard until after a decision from my case against the banks.

This table lists all of the pages in the documents that referenced defamation by Lambroupoulos.

TO DOWNLOAD PDF FILE REFERENCED BELOW http://www.fifix.org/US-Case-No-2-16-cv-05301-ES-JAD.pdf							
DOCUMENT	SECTION OF THE DOCUMENT	DOC PG #	FIRST PDF PG #	SUBSEQUENT PDF PG #'s			
NJ Appeal Foreclosure to Superior Court	Key Points Support Charges	27	113	338	1737	1787	1837
NJ Appeal Foreclosure to Superior Court	Summary	2	128	160	1752	1802	1852
NJ Appeal Foreclosure to Superior Court	Overwhelming Evidence	18	135	174	1759	1809	1859
NJ Appeal Foreclosure to Superior Court	Attachment IV	28 - 31	141 - 144	184 - 187	1765 – 1766	1815 – 1816	1865
Motion for Proof Hearing		112 – 115		1541 – 1544			
ACT Request for Reconsideration of Loan Application	Attachment IX	23 – 24 27 – 28		1577 – 1578	1605 – 1606		

SEIDEN DEFAMATION (Attorney defending against Plaintiff's charges)

<http://www.fifix.org/US-Case-No-2-16-cv-05301-ES-JAD.pdf> PP. 3362 & 3367

The Plaintiff believes another law firm represented the banks in her first case against the defendants. It was not Duane Morris. The banks did not show up in court and blamed the court for their no-show. The Judge at the time is now retired. Mr. Seiden, Duane Morris, made up a false reason for the Plaintiff suspending that case that blames the Plaintiff and supports his case. The Plaintiff was too sick to proceed. The Plaintiff's stress related illness escalated after the defendants evaded the hearing and first legal complaint.

This table lists the pages in the documents that referenced defamation by Seiden.

DOCUMENT	DOC PG #	PDF PG #
Motion to Dismiss	4	3362
	9	3367

At least one of the Plaintiff's witnesses will testify to facts that refute Mr. Seiden's statement.

EXHIBIT II

HOUSING – FINANCE BILL INFORMATION 2016-2017 Legislative Session only (#39 ♦ Source: http://www.njleg.state.nj.us/bills/BillsBySubject.asp)	
A303	Establishes the "Mortgage Assistance Pilot Program."
A666	Creates housing purchase matching grant program for members of United States Armed Forces and New Jersey National Guard who have served in certain military operations.
A766	Allows certain National Guard and United States Reserve members to temporarily defer mortgage loan payments and suspend property tax payments.*
A1195	Prohibits mortgage loan discrimination based on familial status.
A1471	Requires HMFA to establish "Sustainable Tiny Home Pilot Program" in three regions of State; appropriates \$5 million.
A2032	Establishes the "New Jersey Residential Foreclosure Transformation Act."
A2039	Expands financing opportunities for low and moderate income housing.
A2048	Establishes "Police Officer, Firefighter, Public School Teacher, Corrections Officer, and Sanitation Worker Home-buyer Assistance Act"; appropriates \$5 million.
A2180	Requires provisions regarding sellers' obligation to deliver marketable and insurable title in certain residential real estate contracts of sale.
A2462	Extends post-military service protection against mortgage foreclosure.
A2560	Creates housing purchase matching grant program for reserve component of U.S. Armed Forces and the New Jersey National Guard who have served in certain military operations; appropriates \$2,000,000.
A3330	Allows persons affected by certain plant closings, transfers and mass layoffs to receive temporary suspension of payment of interest on mortgage loan.
A3344	Requires creditor to provide mortgage payoff balance on home loan within five business days after notification of request.
A3345	Provides procedure to cancel mortgage of record by affidavit of entitled person under certain circumstances.
A3473	Establishes temporary mortgage relief programs for certain owners of real property impacted by "Superstorm Sandy."
A3678	Regulates certain servicing activities provided by mortgage servicing organizations for residential mortgage loans.
A3998	"Steven Schmincke's Law"; facilitates sober living home construction financing.
A4067	Establishes New Jersey First-Time Home Buyer Savings Account Program; provides gross income tax exclusion for certain earnings on assets maintained in accounts established under program.
A4202	Establishes "Security Deposit Assistance Pilot Program" in Union, Essex, Hudson, and Gloucester counties, appropriates \$210,000.
A4369	Revises "Fair Foreclosure Act."
A4370	Sets time periods for conditions in certain real estate contracts to begin at completion of attorney review period; allows notification of contract disapproval during attorney review by certain methods.
A4505	Provides foreclosure stay of proceedings for certain residential borrowers and exempts certain lenders that offer sustainable mortgage modifications.
S219	Requires mortgage lenders to maintain vacant, age-restricted dwelling units during foreclosure.

HOUSING – FINANCE BILL INFORMATION 2016-2017 Legislative Session only (#39 ♦ Source: http://www.njleg.state.nj.us/bills/BillsBySubject.asp)	
S674	The "New Homebuyers' Bill of Rights Act."
S685	Makes residential mortgage fraud a separate crime.
S749	Extends post-military service protection against mortgage foreclosure.
S1386	Allows certain National Guard and United States Reserve members to temporarily defer mortgage loan payments and suspend property tax payments.*
S1476	Creates housing purchase matching grant program for reserve component of U.S. Armed Forces and the New Jersey National Guard who have served in certain military operations; appropriates \$2,000,000.
S1593	Provides foreclosure stay of proceedings for certain residential borrowers and exempts certain lenders that offer sustainable mortgage modifications.*
S1621	Establishes temporary mortgage relief programs for certain owners of real property impacted by "Superstorm Sandy."
S1629	Establishes the "Mortgage Assistance Pilot Program."
S1821	Establishes temporary mortgage relief programs for certain owners of real property damaged by "Superstorm Sandy."
S1965	Establishes "Police Officer, Firefighter, Public School Teacher, Corrections Officer, and Sanitation Worker Home-buyer Assistance Act."; appropriates \$5 million.
S2270	Requires creditor to provide mortgage payoff balance on home loan within five business days after notification of request.
S2271	Provides procedure to cancel mortgage of record by affidavit of entitled person under certain circumstances.
S2716	Creates housing purchase matching grant program for members of United States Armed Forces and New Jersey National Guard who have served in certain military operations.
S2804	Establishes New Jersey First-Time Home Buyer Savings Account Program; provides gross income tax exclusion for certain earnings on assets maintained in accounts established under program.
S2814	Expands financing opportunities for low and moderate income housing.
S2931	Prohibits mortgage loan discrimination based on familial status.

Other categories of bills include:

Banking and Finance
Banking and Finance – Consumer Finance
Economic Development
Housing Judiciary
Property
Senior Citizens
Taxation – Property Tax

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

VERONICA A. WILLIAMS,

Plaintiff,

v.

LITTON LOAN, et al.,

Defendants.

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

ORDER

The Plaintiff has presented compelling reasons to proceed with this case in U.S.
District Court of New Jersey,

AND NOW, this _____ day of _____, 2017, upon consideration of
the defendant Stern & Eisenberg's Motion to Dismiss the Complaint by Veronica A. Williams,
and any response thereto, it is hereby **DENIED** and that the Motion is **DENIED**.

ESTHER SALAS
UNITED STATES DISTRICT JUDGE

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

<p>VERONICA A. WILLIAMS,</p> <p>Plaintiff,</p> <p>v.</p> <p>LITTON LOAN, et al.,</p> <p>Defendants.</p>

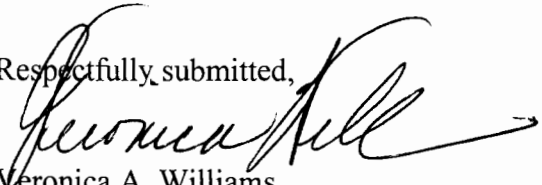
Civ. No. 2:16-cv-05301-ES-JAD

CERTIFICATION OF SERVICE

I, Veronica Williams, certify that on this 4th day of February 2017, a true and correct copy of the Response to Briefings in Opposition was served upon the parties below via U.S. Mail addressed to:

<p>Via U.S. Mail & via Email Stuart I. Seiden, Associate Attorney for Litton Loan Servicing, HSBC Bank USA, Goldman Sachs, Ocwen, Fremont Home Loan trust 2006-C Mortgage-Backed Certificates Series 2006-C</p> <p>Duane Morris LLP 30 South 17th Street Philadelphia, PA 19103-4196 Phone (215) 979-1124 Fax (215) 827-5536 siseiden@duanemorris.com</p>	<p>Via U.S. Mail & via Email Evan Barenbaum, Esq Attorney for Stern & Eisenberg</p> <p>Director of Litigation Stern & Eisenberg, PC 1581 Main Street, Suite 200 Warrington, PA 18976 Office 267-620-2130 Fax 215-572-5025 ebarenbaum@sterneisenberg.com</p>
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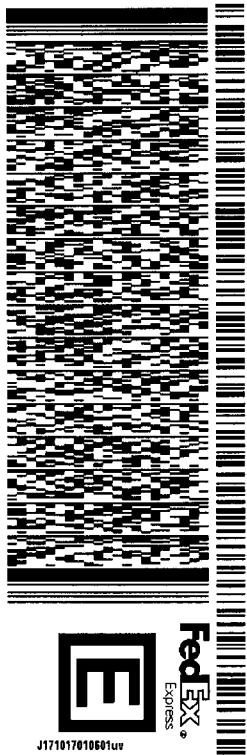
Respectfully submitted,



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Pro Se Counsel StopFraud@vawilliams.com

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February 4, 2017



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SOUTH ORANGE NJ 07079
UNITE STATES US
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ACT WGT: 0.50 LB
CAD: 1005391/IN/ET 3850
BILL SENDER

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