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

Page 1 of 11

<p>VERONICA A. WILLIAMS,</p> <p style="text-align: center;">Plaintiff, Pro Se</p> <p style="text-align: center;">v.</p> <p>LITTON LOAN SERVICING, HSBC BANK USA, N.A.; GOLDMAN SACHS; FREMONT HOME LOAN TRUST 2006-C MORTGAGE-BACKED CERTIFICATES, SERIES 2006-C; OCWEN; STERN & EISENBERG, PC, Ocwen Financial Corporation</p> <p style="text-align: center;">Defendants</p>	<p style="text-align: center;">Civ. No. 2:16-cv-05301-ES-JAD</p> <p style="text-align: center;">MOTION FOR LEAVE OF COURT TO AMEND COMPLAINT</p> <p>FOR PROBLEMS WITH: NJ Case Docket No. F – 000839-13 NJ Case Docket No. ESSX L – 004753-13 NJ Case Docket No. ESSX L – 000081-11</p>
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PLAINTIFF REQUESTS COURT'S LEAVE TO ADD NEW COUNT

**Justice Requires This Count Due to Inadequate Representation
& Denial of Due Process by NJ Courts**

I, the Plaintiff, contend that the new count is necessary because *justice so requires* and request the court's leave to add this count (see USDCNJ¹ Doc#78). The Plaintiff assumes that in their opposition memorandum the defendants refer to Rule (a) (2) from the Federal Rules of Civil Procedure. The defendants' opposition memorandum states that "any amendment would be futile". This rule explains why an amended complaint is *not* "futile". Rather, this rule appears to have been established explicitly for cases such as this. That is, amending the complaint is allowed and *absolutely necessary* for the interest of justice. The rule states:

Rule 15. Amended and Supplemental Pleadings²

(a) Amendments Before Trial

(2) Other Amendments. In all other cases, a party may amend its pleading only with the opposing party's written consent or **the court's leave. The court should freely give leave when justice so requires.**

Justice in this case undeniably requires that this count be added. Reasons are listed on the next page. The Court should freely give leave to the Plaintiff.

¹ United States District Court of New Jersey (USDCNJ)

² Federal Rules of Civil Procedure 18th Edition, Michigan Legal Publishing Ltd., © 2014-2018

The 4,000+ pages filed with the U.S. District Court of New Jersey and Federal Agencies are laden with examples of why amending this complaint is necessary to achieve justice. Here are a few:

- Inadequate legal representation. Lawyers engaged by the Plaintiff did not present the best torts complaint *and* mistakenly chose the NJ Courts vs the U.S. District Court of NJ.
- Defendants' distractions and deflective actions delayed justice
- Denial of due process by the State of New Jersey. Evidence from the NJ Courts and other witnesses will corroborate this.
- Unconscionable 13-year battle from the defendants. Doctors and other medical professionals will testify.

Now the defendants object to a legal action that they unleashed by creating a situation that caused my lawyers to withdraw. As a Per Se Plaintiff with impediments caused by the Defendants, I was unable to add this count until now.

DEFENDANTS CONTINUE DIVIDE AND CONQUER STRATEGY – CONFIRM FILINGS

The defendants continue to execute a flip of the divide and conquer strategy that the Plaintiff documented in letter to the Clerk, U.S. District Court (Jan. 3, 2017). USDCNJ filings #82 and #83 are two more examples. Plaintiff has filed multiple responses to Defendants' Motion to Dismiss: Jan. 17, 2017 , Feb. 6, 2017, Feb. 8, 2017, Feb. 13, 2018, #77, #81, (filings Docs #33, #34 and #77 are revised based on the Feb. 6, 2018 filing from the defendants and my Motion USDCNJ Doc #78 & #74 – witnesses.

So far, there are 4 documents filed that I cannot find in Pacer. They could exist but I cannot find them. Copies are enclosed. A physical copy of my index file is enclosed.

SOME DOCUMENTS FILED MAY NOT BE IN PACER

DATE OF DOCUMENT	TITLE OF DOCUMENT	NO. OF PAGES	PACER NO.
<u>Jan. 17, 2017</u>	RESPONSE TO TWO BRIEFINGS IN OPPOSITION REPRESENTING ALL DEFENDANTS	8	
<u>Feb. 6, 2017</u>	RESPONSE TO STERN & EISENBERG'S MOTION TO DISMISS	12	
<u>Feb. 8, 2017</u>	I am writing to ensure that you include my Feb. 6, 2017 Response to Motion to Dismiss (listed below) in your February 21, 2017 decision.	12	
<u>Feb. 13, 2018</u>	UPDATE TO PLAINTIFF'S RESPONSE TO MOTIONS TO DISMISS	9	

PLEASE NOTE THIS LIST DOES NOT INCLUDE THE MAJORITY OF FILES SUBMITTED TO USDOCNJ ON THUMB DRIVES.

DEFENDANTS CONTINUE TO TRY TO REDEFINE THEMSELVES

Despite U.S. District Court of New Jersey filings USDCNJ filings #51, #54, #80 and others, the defendants persist in trying to redefine themselves. After 5 years of trying to change my choice of defendants, I must point out the obvious. A first year law or business student understands the responsibility and liability of ownership. The Plaintiff's choice of defendants is based on the roles played in illegal actions as well as the responsibility and liability of ownership. The latest objection is included in Document #82. Having to respond over and over forces resource consuming busywork. Yet I responded, at the cost of another stress-related hospitalization 1 week after the hearing held February 9, 2018. The defendants' nefarious financial and legal tactics continue to reinforce my count of depraved indifference.

DEFENDANTS' ACTIONS STONEWALL PLAINTIFF

As a result of damages imposed by the defendants, I, the Plaintiff, do not have access to Westlaw, LexisNexis or even a law library. So I am unable to present a long list of authorities and precedents like the defendants. A few certainly do exist. More importantly, this case will serve as a strong precedent to discourage these and other firms to create future victims of financial fraud. Please note that the Plaintiff did not learn about USDOCNJ filing #82 until I received filing #83.

Conclusion. Rule (a) (2) from the Federal Rules of Civil Procedure supports the addition of a count to the complaint. It is necessary because justice so requires. The Plaintiff reiterates, again, the defendants named in the complaint and throughout the filings are the true defendants. A few former filings are enclosed to make sure they are in the case files. The amended complaint is enclosed. Finally, I, the Plaintiff, ask the Court to allow me to proceed to trial and receive my long awaited constitutional right to present my case before a jury of my peers.

Respectfully submitted,


Veronica A. Williams

Pro Se Counsel

/s/ Veronica A. Williams

Veronica A. Williams

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Phone (202) 486-4565

March 2, 2018

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

VERONICA A. WILLIAMS,

Plaintiff,

v.

LITTON LOAN SERVICING, HSBC BANK
USA, N.A.; GOLDMAN SACHS; FREMONT
HOME LOAN TRUST 2006-C MORTGAGE-
BACKED CERTIFICATES, SERIES 2006-C;
OCWEN; STERN & EISENBERG, PC, Ocwen
Financial Corporation

Defendants.

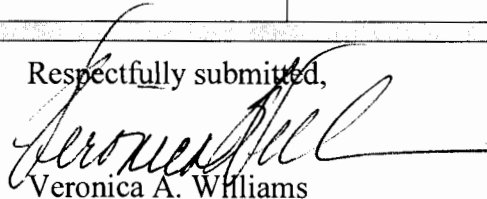
Civ. No. 2:16-cv-05301-ES-JAD

CERTIFICATION OF SERVICE

I, Veronica Williams, certify that on this 28th day of February 2018, a true and correct copy of this document will be given to counsel or sent to the parties via the method and as addressed below:

<p>Via Email Brett Messinger, Partner BLMessinger@duanemorris.com Stuart I. Seiden, Associate siseiden@duanemorris.com Attorneys for Litton Loan Servicing, HSBC Bank USA, Goldman Sachs, Ocwen, Fremont Home Loan trust 2006-C Mortgage-Backed Certificates Series 2006-C Duane Morris LLP 30 South 17th Street Philadelphia, PA 19103-4196 Phone (215) 979-1124 Fax (215) 827-5536</p>	<p>Via Email Evan Barenbaum, Esq Attorney for Stern & Eisenberg 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 smalone-zeitz@sterneisenberg.com</p>	<p>Via U.S. Mail Attorney General for the State of NJ Mr. Gurbir S. Grewal Attorney General Office of The Attorney General The State of New Jersey Richard J. Hughes Justice Complex (HJC) 25 Market Street 8th Floor, West Wing Trenton, NJ 08625-0080</p>
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Respectfully submitted,



Veronica A. Williams
Pro Se Counsel

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March 2, 2018

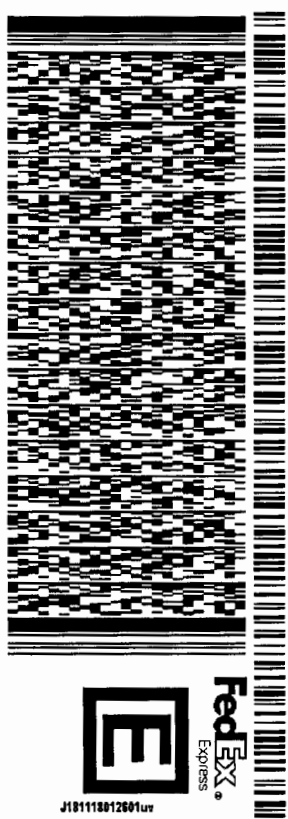
**AMENDED COMPLAINT AND JURY
DEMAND**

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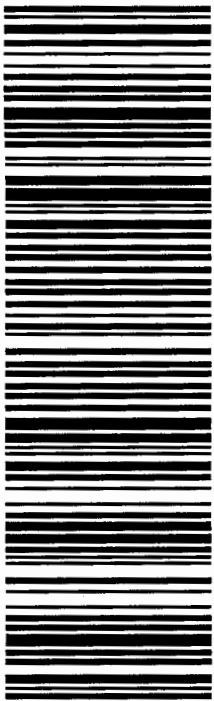


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