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

U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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2018 MAR 15 P 3:05

VERONICA A. WILLIAMS,

Plaintiff, Pro Se

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

**DEFENDANTS FAIL TO COMPLY WITH
JUDGE DICKSON'S DIRECTIVE**

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

LETTER TO THE COURT

PLAINTIFF REQUESTS DISCOVERY INFORMATION FROM DEFENDANTS – AGAIN

Multiple Requests Made Since January 16, 2018

I, the Plaintiff, requested information in USDCN filing #74, also during the Feb. 9, 2018 hearing, and again on March 9, 2018. Judge Dickson told Mr. Seiden to give me, the Plaintiff, copies of the two depositions (i.e. of the Plaintiff on October 2, 2014 and of Kevin Flanagan during 2014). The depositions have not been received. None of the information requested has been received.

The Plaintiff implores the Court to grant the trial and the subpoenas requested. The responses to the subpoenas and witness testimony will *further* corroborate the evidence already submitted in this case.

The latest request sent to the defendants is presented on the next two pages.

March 8, 2018

**TO: Mr. S. Seiden & Mr. B. Messinger, DUANE MORRIS
Mr. E. Barenbaum & Ms. S. Malone-Zeitz, STERN & EISENBERG**

FROM: Veronica Williams

SENT: 2 pages sent via email

As requested, the list of witnesses to be subpoenaed is attached. Is there anything else that either of you need?

I have been busy responding to your filings and also recovering from a Feb. 16th hospitalization. I shall endeavor to proceed and will try to provide anything else you need by end of day Friday, March 9th.

I have been advised that we should file a letter with the US District Court if the requested documents are not received. As a reminder, the documents that I am waiting for include:

- **Deposition of Veronica Williams – Judge Dickson ordered Mr. Seiden to provide this document by March 9th**
- **Deposition of Kevin Flanagan – Judge Dickson ordered Mr. Seiden to provide this document by March 9th**
- **Name and contact information of the person referenced in the foreclosure file that was interviewed and worked with Veronica Williams at Orange Memorial Hospital**
- **Other requests**

Remaining requests are listed on the attached page. These requests were documented in our proposed Discovery Plan and also in USDCNJ Court Filing # 74 dated Jan. 16, 2018.

If I do not receive this information by close of business March 8, 2018, this message will be included in a letter to the US Court of NJ that I am obligated to file.

Awaiting information from each of you,

Veronica Williams

Reference docs with questions for Seiden & Barenbaum questions.

◆ ONLINE ◆ ON-PC ◆ DOC-ON-PC ◆ XXX

INFORMATION REQUESTED FROM DEFENDANTS

In accordance with Rule 26 of The Federal Rules of Civil Procedure, 2018 Edition

Please provide all documents, recordings and other information defined in Rule 26 of The Federal Rules of Civil Procedure, 2018 Edition (FRCP). This evidence includes, but is not limited to:

HSBC, Goldman Sachs, Owen, Litton Loan, Fremont represented by Stuart Seiden

- Please provide copy of deposition of Plaintiff, Veronica Williams, near 7/18/2014 in compliance with FRCP Rule 30 (b)(5)
- Please provide copy of deposition of Kevin Flanagan of Ocwen
- Whose balance sheet carries Fremont Home Loan Trust Mortgage-Backed Certificates Series 2006-C?
- On what date did HSBC engage Duane Morris to represent the defendants?

Stern & Eisenberg represented by Evan Barenbaum

- Name of Veronica Williams's fellow employee or colleague at Orange Memorial Hospital who was interviewed by Stern & Eisenberg
- Names of NJ employees in clerk and filing office who have worked with Stern & Eisenberg employees or representatives
- Names of cases that Daniel Roy worked on for Stern & Eisenberg
- Date that Daniel Roy provided Stern & Eisenberg in Plaintiff's NJ Foreclosure file
- First and most recent dates that Daniel Roy performed work for Stern & Eisenberg
- Dated, certified document that mortgage in Plaintiff's foreclosure was filed with NJ
- Stern & Eisenberg's Relationship with Royal Title Service Inc. & Opal Title Service LLC
- Provide Contact information for notary on mortgage

All Defendants

Addresses for witnesses to be subpoenaed are enclosed, as requested by the Defendants attorneys on Feb. 9, 2018.

Federal Employees Directly or Indirectly Related to US Department of Justice Investigation No. 3017165

- Was information provided by Plaintiff relevant to findings against HSBC, Goldman Sachs and other companies?
- What other Agencies or people were privy to the information provided by the Plaintiff?

Additional questions will be provided. New & updated digital docs are included

Withholding information is just one of the strategies that the defendants have employed in their campaign of fraud to steal the Plaintiff's home and likely the homes of others. The fraudulent mortgage was withheld from the Plaintiff by multiple attorneys from multiple law firms (i.e. at least 4) engaged directly or indirectly by the defendants. This is evidenced in the case documents and will be further corroborated by witness testimony and information that will be subpoenaed.

The Plaintiff is prepared to connect all information in this case to fraud by the defendants. My presentation has been structured and simplified so that the financial and operational complexities can be understood by a jury. I look forward to my day in court.

Respectfully submitted,



Veronica A. Williams

Pro Se Counsel

/s/ Veronica A. Williams

Veronica A. Williams

StopFraud@vawilliams.com

Phone (202) 486-4565

March 15, 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-
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Defendants.

U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
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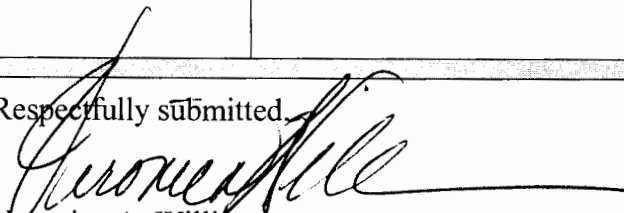
Civ. No. 2:16-cv-05301-ES-JAD

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</p> <p>Stuart I. Seiden, Associate</p> <p>Attorneys 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</p>	<p>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</p>	<p>Via U.S. Mail Attorney General for the State of NJ</p> <p>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

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

March 15, 2018

Mojo

V. A. Williams
P.O. Box 978 ❖ South Orange, New Jersey ❖ 07079-3009

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U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
NEWARK

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Clerk, US District Court
Martin Luther King Jr. Federal Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07102-3595

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