

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ❖ South Orange, NJ 07079-0978  
Residence – NO MAIL: 541 Scotland Road ❖ South Orange, NJ 07079-3009

---

July 2, 2016

Supreme Court of New Jersey  
Appellate Division Clerk's Office  
P.O. Box 970  
Trenton, New Jersey, 08625

**Download this submission at**  
**[www.FinFix.org/Appeal-NJS.pdf](http://www.FinFix.org/Appeal-NJS.pdf)**

Subject: Appeal of Cases [DOCKET No. ESSEX-L-004753-13](#) & [Docket No. ESSEX-F – 000839-13](#)

To The Supreme Court of New Jersey,

I am appealing both cases listed above and requesting a jury trial by September. There are many reasons that justify why a jury trial should be granted immediately *with my original claim against all defendants*. Here are just two: I have been denied due process and, two defendants have recent Federal settlements that include the same charges that I levied in this case.

Any financial professional with a modicum of financial education and a smidgeon of common sense knows that anyone who has lived in a property for 26 years without a foreclosure has been paying their mortgage. I submitted an amortization of all mortgages since I purchased my home in 1983, with supporting documentation, proving that the defendants inflated my principal balance by more than \$200,000! This is just one of the preponderance of evidence that helped the Federal government convince two of the defendants, HSBC and Goldman Sachs, to pay at least \$470M and \$5B in fines, respectively. Yet, Judge Cocchia dismissed these defendants without proper procedure and without my knowledge!

This submission includes an excerpt of the 2 appeals filed with the Superior Court of New Jersey Appellate Division (Appeals Court). As instructed by the Court, each has been reduced. The 25 page target has been met by submitting a total of 50 pages for both documents. One appeal was reduced to 21 pages, and the other to 28 pages. Attachment I proves that each appeal was received by the Appeals Court. Yet only 1 appeal was assigned a case number. Critical documents to which I have been made privy or that I filed are listed below. Hyperlinks to download these documents are also provided.

No. Pgs	Documents	Download
33	Appeal F – 000839-13	<a href="http://www.finfix.org/Appeal-NJF.pdf">http://www.finfix.org/Appeal-NJF.pdf</a>
59	Appeal L – 004753-13	<a href="http://www.FinFix.org/Appeal-NJ.pdf">www.FinFix.org/Appeal-NJ.pdf</a>
118	Enclosures	<a href="http://www.FinFix.org/Appeal-Encl-NJ.pdf">www.FinFix.org/Appeal-Encl-NJ.pdf</a>
93	Case Files	<a href="http://www.FinFix.org/CaseFiles-NJ.pdf">www.FinFix.org/CaseFiles-NJ.pdf</a>
750	Discovery	<a href="http://www.finfix.org/proof/DD/Motion-for-Proof-Hearing_SHARED.pdf">http://www.finfix.org/proof/DD/Motion-for-Proof-Hearing_SHARED.pdf</a>
205	Motion for Proof Hearing	<a href="http://finfix.org/proof/DD/Discovery-Documents_ALL_11-18-14.pdf">http://finfix.org/proof/DD/Discovery-Documents_ALL_11-18-14.pdf</a>
1,258	<b>TOTAL</b>	
<b>PLEASE NOTE THIS IS LESS THAN 2% OF THE DOCUMENTATION ASSOCIATED WITH THIS CASE.</b>		

Both cases are fraught with improprieties. Several actions by the NJ Courts constitute a quantum miscarriage of justice.

I only learned when I called the Appeals Court a few days ago that my appeal had been denied and my second appeal had not been recorded. This request is that the Supreme Court grant the Leave of Motion filed for [DOCKET No. ESSEX-L-004753-13](#) and the appeal filed for the overturn of [Docket No. ESSEX-F – 000839-13](#).

The defendants initiated their fraud against me a decade ago. They have successfully protracted my legal effort since 2009. The failure to grant me a speedy trial is a travesty. My health and finances have been decimated by the defendants. I want a decision on this appeal this month and a trial no later than the end of September. **Otherwise, I have no choice but to remove these cases to the Federal courts.**

I am scheduled to hear a case in September so we will need to hold scheduling conference call soon to schedule the trial for this appeal.

If you require additional information or have questions please contact me by email at [StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com) or by phone at 973-715-8580.

Since the NJ courts have failed to notify me of most critical dates and matters, please send your response by email to [StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com) or via facsimile to 888-492-5864,

Thank you,

Veronica Williams  
Plaintiff & Owner of 541 Scotland Road since 1983

Attachment and Enclosures

cc without enclosures (parties have already received enclosures):

David M. Lambropoulos, Stern & Eisenberg, PC via US certified mail & via email  
Superior Court of New Jersey, Essex County Veterans Courthouse, Room 131 via US Mail  
Judge Stephanie Ann Mitterhorf via facsimile to  
Stuart Seiden, Duane Morris LLP via US certified mail & via email  
Brett L. Messinger, Partner, Duane Morris via email  
Office of the Attorney General of the United States, Investigation No. 3017165  
Federal Mortgage Working Group

## ATTACHMENT I

Proof of Delivery of Appeals: [DOCKET No. ESSEX-L-004753-13](#) & [Docket No. ESSEX-F – 000839-13](#)

### APPEAL OF FORECLOSURE ♦ F – 000839-13 ♦ Mailing & Shipping Receipts

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Sent to: Superior Court of NJ  
Street & Apt. No.: PO Box 006  
City, State, ZIP+4: Trenton, NJ 08625

PS Form 3800, August 2006 See Reverse for Instructions

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Sent to: David M. Lambropoulos, SkindEisenberg  
Street & Apt. No.: 1040 N. Kings Hwy, Suite 407  
City, State, ZIP+4: Cherry Hill, NJ 08034

PS Form 3800, July 2014 See Reverse for Instructions

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**PHILADELPHIA, PA 19103**

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Certified Fee \$2.70  
Return Receipt Fee (Endorsement Required) \$0.00  
Restricted Delivery Fee (Endorsement Required) \$0.00  
Total Postage & Fees \$8.20

Sent to: Mr. Stuart Seiden, Duane Morris L.P.  
Street & Apt. No.: 30 S. 17th St. Floor 5  
City, State, ZIP+4: Philadelphia, PA 19103

PS Form 3800, July 2014 See Reverse for Instructions

UP AND UP INC  
71 S ORANGE AVE  
SOUTH ORANGE, NJ 070791  
05/17/2016 15:52:50  
CREDIT CARD  
MC SALE  
Card # XXXXXXXXXXXX6353  
SEQ #: 15  
Batch #: 1653  
INVOICE 16  
Approval Code: 079055  
Entry Method: Swiped  
Mode: Online  
Tax Amount: \$0.00  
SALE AMOUNT \$53.75

CUSTOMER COPY

#### US Certified Mail Receipt 7014

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Purchased 5/17/16

Sent to:

Superior Court of NJ

PO Box 006

Trenton, NJ 08625

#### US Certified Mail Receipt 7014

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Delivered & Signed 5/20/16

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<input checked="" type="checkbox"/> Complete items 1, 2, and 3. <input checked="" type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input checked="" type="checkbox"/> Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name) <input checked="" type="checkbox"/> Date of Delivery 5/20/16 C. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:
1. Article Addressed to: Superior Court of NJ Appellate Division Clerk's Office PO Box 006 Trenton, NJ 08625 9590 9402 1363 5285 2422 52	D. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Certified Mail <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Registered Mail <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation <input type="checkbox"/> Signature Confirmation Restricted Delivery
2. Article Number (Transfer from service label) 7014 0150 0000 0304 9408 Form 3811, July 2015 PSN 7530-02-000-9003	Domestic Return Receipt



**APPEAL OF CIVIL CASE ♦ L – 004753-13 ♦ Mailing & Shipping Receipts**

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Appellate Div. Clerk's Office  
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[https://tools.usps.com/go/TrackConfirmAction?tqc\\_tLabels1=9405510200882002743491](https://tools.usps.com/go/TrackConfirmAction?tqc_tLabels1=9405510200882002743491)

**MODIFIED**

**APPEAL OF COURT ORDERS**

**Superior Court of New Jersey**

**Essex Vicinage**

**DOCKET NO. ESSEX-L-004753-13**

**AND**

**MOTION FOR LEAVE TO APPEAL**

**MOTIONS TO WAIVE FEES**


**To Download Redacted Copy**

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**[www.FinFix.org/CaseFiles-NJ.pdf](http://www.FinFix.org/CaseFiles-NJ.pdf)**

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 <div style="display: inline-block; text-align: center; margin-left: 20px;"> <b>New Jersey Judiciary</b>  <b>Superior Court - Appellate Division</b>  <b>NOTICE OF APPEAL</b> </div> <div style="border: 3px double red; padding: 10px; display: inline-block; margin-left: 20px; color: red; font-weight: bold; font-size: 1.2em;">             MODIFIED         </div>																																	
<small>Type or clearly print all information. Attach additional sheets if necessary.</small>																																	
<b>TITLE IN FULL (AS CAPTIONED BELOW): (1)</b> Veronica Williams v. Litton Loan Servicing, HSBC Bank USA, NA, Fremont Home Loan trust 2006-C Mortgage-Backed Certificates Series 2006-C, Goldman Sachs, Ocwen, Stern & Eisenberg, PC	<b>ATTORNEY / LAW FIRM / PRO SE LITIGANT (2)</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="4" style="padding: 2px;"><small>NAME</small></td> </tr> <tr> <td colspan="4" style="padding: 2px;">Veronica A. Williams</td> </tr> <tr> <td colspan="4" style="padding: 2px;"><small>STREET ADDRESS</small></td> </tr> <tr> <td colspan="4" style="padding: 2px;">541 Scotland Road</td> </tr> <tr> <td style="padding: 2px;"><small>CITY</small></td> <td style="padding: 2px;"><small>STATE</small></td> <td style="padding: 2px;"><small>ZIP</small></td> <td style="padding: 2px;"><small>PHONE NUMBER</small></td> </tr> <tr> <td style="padding: 2px;">South Orange</td> <td style="padding: 2px;">NJ</td> <td style="padding: 2px;">07079</td> <td style="padding: 2px;">202-486-4363</td> </tr> <tr> <td colspan="4" style="padding: 2px;"><small>EMAIL ADDRESS</small></td> </tr> <tr> <td colspan="4" style="padding: 2px;">StopFraud@vawilliams.com</td> </tr> </table>	<small>NAME</small>				Veronica A. Williams				<small>STREET ADDRESS</small>				541 Scotland Road				<small>CITY</small>	<small>STATE</small>	<small>ZIP</small>	<small>PHONE NUMBER</small>	South Orange	NJ	07079	202-486-4363	<small>EMAIL ADDRESS</small>				StopFraud@vawilliams.com			
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South Orange	NJ	07079	202-486-4363																														
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StopFraud@vawilliams.com																																	
<b>ON APPEAL FROM</b>																																	
<b>TRIAL COURT JUDGE (3)</b> Stephanie Ann Mitterhoff	<b>TRIAL COURT OR STATE AGENCY (4)</b> NJ Superior Court Essex Vicinage	<b>TRIAL COURT OR AGENCY NUMBER (5)</b>																															
Notice is hereby given that (6) <u>Veronica A. Williams</u> appeals to the Appellate Division from a <input type="checkbox"/> Judgment or <input checked="" type="checkbox"/> Order entered on <u>3/4/16 &amp; 2/19/16 &amp; 1/23/15</u> in the <input checked="" type="checkbox"/> Civil <input type="checkbox"/> Criminal or <input type="checkbox"/> Family Part of the Superior Court of <u>from a</u> <input type="checkbox"/> State Agency decision entered on <u>11/22/13 &amp; 9/25/13</u>																																	
If not appealing the entire judgment, order or agency decision, specify what parts or paragraphs are being appealed.																																	
Have all issues, as to all parties in this action, before the trial court or agency been disposed of? (In consolidated actions, all issues as to all parties in all actions must have been disposed of.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If not, has the order been properly certified as final pursuant to R. 4:42-2? <input type="checkbox"/> Yes <input type="checkbox"/> No																																	
For criminal, quasi-criminal and juvenile actions only:																																	
A)	Give a concise statement of the offense and the judgment including date entered and any sentence or disposition imposed:																																
B)	This appeal is from a <input type="checkbox"/> conviction <input checked="" type="checkbox"/> post judgment motion <input type="checkbox"/> post-conviction relief. If post-conviction relief, is it the <input type="checkbox"/> 1st <input type="checkbox"/> 2nd <input type="checkbox"/> other _____ <span style="display: block; text-align: right; font-size: 0.8em;">specify</span>																																
C)	Is defendant incarcerated? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Was bail granted or the sentence or disposition stayed? <input type="checkbox"/> Yes <input type="checkbox"/> No																																
D)	If in custody, name the place of confinement:																																
Defendant was represented below by: <input type="checkbox"/> Public Defender <input type="checkbox"/> self <input checked="" type="checkbox"/> private counsel <u>Duane Morris LLP</u> <span style="display: block; text-align: right; font-size: 0.8em;">specify</span>																																	

1) Notice of appeal and attached case information statement have been served where applicable on the following:

	Name	Date of Service
Trial Court Judge	Stephanie Ann Mitterhoff	April 25, 2016

Trial Court Division Manager

Tax Court Administrator

State Agency

Attorney General or Attorney for other

Governmental body pursuant to

R. 2:5-1(a), (e) or (h)

Other parties in this action:

Name and Designation	Attorney Name, Address and Telephone No.	Date of Service
Litton Loan & HSBC & Ocwen & Goldman Sachs et al -defendants	Stuart Seiden, Deane Morris, 30 S. 17th St, Philadelphia, PA 19103-4196 Phone 215-979-1141	April 25, 2016

2) Attached transcript request form has been served where applicable on the following:

	Name	Date of Service	Amount of Deposit
Trial Court Transcript Office			
Court Reporter (If applicable)			
Supervisor of Court Reporters			
Clerk of the Tax Court			
State Agency			

3) Exempt from submitting the transcript request form due to the following:

- ☒ No verbatim record.
- ☒ Transcript in possession of attorney or pro se litigant (four copies of the transcript must be submitted along with an electronic copy).  
List the date(s) of the trial or hearing:  
Jan. 23, 2015 & Feb. 19, 2016
- ☐ Motion for abbreviation of transcript filed with the court or agency below. Attach copy.
- ☒ Motion for free transcript filed with the court below. Attach copy.

I certify that the foregoing statements are true to the best of my knowledge, information and belief.  
I also certify that, unless exempt, the filing fee required by N.J.S.A. 22A:2 has been paid.

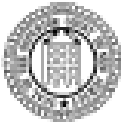
(14) April 25, 2016

DATE

(15)

SIGNATURE OF ATTORNEY OR PRO SE LITIGANT



 <div style="display: inline-block; vertical-align: middle; text-align: center;"> <b>New Jersey Judiciary</b>  <b>Superior Court - Appellate Division</b>  <b>CIVIL CASE INFORMATION STATEMENT</b> </div>	
Please type or clearly print all information.	
<b>TITLE IN FULL (1)</b>  Veronica Williams v. Litton Loan Servicing, HSBC Bank USA, NA, Fremont Home Loan trust 2006-C Mortgage-Backed Certificates Series 2006-C, Goldman Sachs, Ocwen, Stern & Eisenberg, PC, NJ Case Docket ESSX L - 004753-13.	<b>TRIAL COURT OR AGENCY DOCKET NUMBER (2)</b>  Case Docket ESSX L - 004753-13
* Attach additional sheets as necessary for any information below.	
<b>APPELLANT'S ATTORNEY</b> EMAIL ADDRESS: StopFraud@vawilliams.com	
<input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT <input type="checkbox"/> OTHER (SPECIFY)	
<b>NAME</b> Veronica A. Williams	<b>CLIENT</b> Veronica A. Williams
<b>STREET ADDRESS</b> 541 Scotland Road	<b>CITY</b> South Orange
<b>STATE</b> NJ	<b>ZIP</b> 07079
<b>TELEPHONE NUMBER</b> 202-486-4565	
<b>RESPONDENT'S ATTORNEY *</b> EMAIL ADDRESS:	
<b>NAME</b> Stuart Seiden	<b>CLIENT</b> HSBC, Litton Loan et. al.
<b>STREET ADDRESS</b> Duane Morris LLP, 30 S. 17th St.,	<b>CITY</b> Philadelphia
<b>STATE</b> PA	<b>ZIP</b> 19103-4
<b>TELEPHONE NUMBER</b> (215) 979-1141	
* Indicate which parties, if any, did not participate below or were no longer parties to the action at the time of entry of the judgment or decision being appealed.	
<b>GIVE DATE AND SUMMARY OF JUDGMENT, ORDER, OR DECISION BEING APPEALED AND ATTACH A COPY:</b> March 4, 2016 & Feb. 19, 2016 & Jan. 23, 2015 & Nov. 22, 2013 & Sept. 25, 2013	
Are there any claims against any party below, either in this or a consolidated action, which have not been disposed of, including counterclaims, cross-claims, third-party claims and applications for counsel fees? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
If so, has the order been properly certified as final pursuant to R. 4:42-2? (If not, leave to appeal must be sought. R. 2:2-4.2:5-6) <input type="checkbox"/> YES <input type="checkbox"/> NO	
(If the order has been certified, attach, together with a copy of the order, a copy of the complaint or any other relevant pleadings and a brief explanation as to why the order qualified for certification pursuant to R. 4:42-2.)	
Were any claims dismissed without prejudice? <input type="checkbox"/> YES <input type="checkbox"/> NO	
If so, explain and indicate any agreement between the parties concerning future disposition of those claims.	
Is the validity of a statute, regulation, executive order, franchise or constitutional provision of this State being questioned? (R. 2:5-1(h)) <input type="checkbox"/> YES <input type="checkbox"/> NO	
<b>GIVE A BRIEF STATEMENT OF THE FACTS AND PROCEDURAL HISTORY:</b> The defendants' fraud against me started in 2006. Rather than act in good faith to resolve my objections to their fraudulent actions, the defendants made false commitments and sold my mortgage amongst themselves three (3) times in just a few years! After repeatedly reneging on their word, the defendants forced me to take legal action in 2010. Since I filed the first legal complaint, the defendants have driven up legal expenses and imposed unacceptable delays. I deserved my day in court in 2011. This appeal is to have the appellate court schedule a jury trial at the earliest possible date. See pp. 22 - 23 & 24 - 40 for explanation.	

TO THE EXTENT POSSIBLE, LIST THE PROPOSED ISSUES TO BE RAISED ON THE APPEAL AS THEY WILL BE DESCRIBED IN APPROPRIATE POINT HEADINGS PURSUANT TO R. 2:8-2(e)(5). (Appellant or cross-appellant only):

An order may have been issued in January 2013 but I was not allowed in the hearing nor did I receive any documents after the Jan. 13, 2013 hearing.

I am told Judge Mitterhoff made a decision on a Motion that I filed Feb. 17, 2016 but her office instructed me to wait for something in the mail. I have not received anything yet.

Judge Carey's decision, when I represented myself in court Nov. 2014, was reversed but I have not received documents confirming nor supporting that decision.

IF YOU ARE APPEALING FROM A JUDGMENT ENTERED BY A TRIAL JUDGE SITTING WITHOUT A JURY OR FROM AN ORDER OF THE TRIAL COURT, COMPLETE THE FOLLOWING:

1. Did the trial judge issue oral findings or an opinion? If so, on what date? 2/19/16-3/4/16-1/23/16 ☒ YES ☐ NO  
& 11/22/13 & 9/25/13
2. Did the trial judge issue written findings or an opinion? If so, on what date? \_\_\_\_\_ ☐ YES ☐ NO
3. Will the trial judge be filing a statement or an opinion pursuant to R. 2:5-1(b)? ☐ YES ☐ NO

Caution: Before you indicate that there was neither findings nor an opinion, you should inquire of the trial judge to determine whether findings or an opinion was placed on the record out of counsel's presence or whether the judge will be filing a statement or opinion pursuant to R. 2:5-1(b).

DATE OF YOUR INQUIRY: Feb - March 9, 2016

1. IS THERE ANY APPEAL NOW PENDING OR ABOUT TO BE BROUGHT BEFORE THIS COURT WHICH:

- (A) Arises from substantially the same case or controversy as this appeal? ☐ YES ☒ NO
- (B) Involves an issue that is substantially the same, similar or related to an issue in this appeal? ☐ YES ☒ NO

2. WAS THERE ANY PRIOR APPEAL INVOLVING THIS CASE OR CONTROVERSY? ☐ YES ☒ NO

IF THE ANSWER TO EITHER 1 OR 2 ABOVE IS YES, STATE:

Case Name:

Appellate Division Docket Number:

Civil appeals are screened for submission to the Civil Appeals Settlement Program (CASP) to determine their potential for settlement or, in the alternative, a simplification of the issues and any other matters that may aid in the disposition or handling of the appeal. Please consider these when responding to the following question. A negative response will not necessarily rule out the scheduling of a preargument conference.

State whether you think this case may benefit from a CASP conference.

☐ YES ☐ NO

Explain your answer:

I was denied mediation on July 10, 2014 and would welcome participation in the Civil Appeals Settlement Program (CASP). Since several attorneys feel this matter involves very complex issues, I am also willing to participate in a pre-argument conference in order to delineate and clarify those issues prior to briefing

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

(17) Veronica A. Williams  
Name of Appellant or Respondent

(18) Veronica A. Williams  
Name of Counsel of Record  
(or your name if not represented by counsel)

(19) April 12, 2016  
Date

(20) \_\_\_\_\_  
Signature of Counsel of Record  
(or your signature if not represented by counsel)

9. If you did not immediately seek a stay from the trial court or agency, or if you did not immediately file this application with the Appellate Division after the trial court or agency denied your stay application, explain the reasons for the delay.  
My efforts to file documents with the Superior Court in Newark have been met with changing requirements and excessive walking that caused severe pain. I have been unsuccessful and seek to appeal to the Appellate Division. This matter started in 2006, legal action filed in 2010, and I have had to endure excessive delays.
10. Are there any claims against any party below, either in this or a consolidated action, which have not been disposed of, including counterclaims, cross-claims, third-party claims and applications for counsel fees?  
If so, the decision is not final, but rather interlocutory, and leave to appeal must be sought. (Court Rules 2:2-4 and 2:5-6)  
Not that I know of. I have yet to review the case files.
11. If the order or agency decision is interlocutory (i.e., not final), are you filing a motion for leave to appeal?  
I do not know yet.
12. If interlocutory, are you filing a motion to stay the trial court or agency proceeding?
13. If the order, judgment or agency decision is final, have you filed a notice of appeal?  
This is my first notice of appeal.
14. What is the essence of the order, judgment or agency decision?  
The order responded to only a portion of the complaint. The decision is split amongst counts and defendants. A summary is provided in the attached order.

15. a) Has any aspect of this matter been presented to or considered by another judge or part of the Appellate Division by emergent application or prior appeal proceedings? If so, which judge or part?

This has not been presented to the Appellate Division. There have been several judges assigned from the Essex Vicinage since the initial filing in 2010.

- b) Have the merits briefs been filed in this matter? If so, has the matter been calendared to a part of the Appellate Division?

Discovery document, Motion for Proof Hearing, Motions, Responses to Motions, and other documents have been filed with the NJ Superior Court but this is the first document presented to the Appellate Division.

16. a) Have you served simultaneously a copy of this application on both your adversary and the trial judge or agency?

Yes.

- b) If so, specify method of service.

U.S. Certified Mail and email to the Defendants' attorney

U.S. Mail to the Superior Court Essex Vicinage and to Judge Mitterhoff

17. a) Have any transcripts been ordered (particularly of the trial judge's challenged ruling)?

I attempted this and, after Judge Carvey signed the forms, the Transcripts Section told me I had to file a Motion. I am including the form required with this submission. Once this motion has been approved, I shall re-submit the request for transcript.

- b) If so, when will the transcript(s) be available?

That depends on the NJ Court. I am told the transcripts should be available in 30 days but it depends on the backlog.

18. Please give a brief summary of the facts of your case.

**THE COMPLETE SUMMARY AND SUPPORTING INFO IS IN THE ATTACHED DOCUMENT**

This process has confirmed that Plaintiff's counsel provided superb defense. My appeal to present this matter to a jury should be granted. There are several key points that support at least violation of Breach of Contract and the New Jersey Consumer Fraud ACTs against all defendants:

- Fremont Investment and Loan;

- o Did not file required documents with the State of New Jersey, Essex County Hall of Records

- o Was issued, and violated, a cease-and-desist order issued by the U.S. Department of Justice on 3/8/07 (Motion Proof Hearing Ex-B-28: Article)

- o Presented false documents via their attorney in their response to my Motion filed Feb. 17, 2016 (p. 156- 162 & p. 117) C:\CriticalFiles\CURRENT\_Post2010\Veronica Williams\Legal\_Prepaid\Case\_LittonLoan\COURT\_DuaneMorris\_Williams-Motion-for-Summary-Judgment-filed\_recv\_2-18-16.pdf & [http://www.findia.org/proof/VWDS/COURT\\_DuaneMorris\\_Williams-Motion-for-Summary-Judgment-filed.pdf](http://www.findia.org/proof/VWDS/COURT_DuaneMorris_Williams-Motion-for-Summary-Judgment-filed.pdf)

- HSBC pierced the corporate veil: Mr. Seiden told me during his deposition of me during the summer of 2014 that HSBC was paying for the legal defense and represented all defendants. When I told Mr. Messinger immediately after our Feb. 19th hearing that HSBC was paying legal fees, he responded with surprise and chagrin, How did you know that?!!!

- Goldman Sachs: the corporate veil was pierced and arms-length removed when they advised Radian on the acquisition of Enhance Financial Services, the owner of Litton Loan at the time.

19. What legal citation (i.e., statute, regulation, court case) is most important for the proposition that you are likely to prevail on appeal?

Breach of Contract

Negligent Misrepresentation

Bad Faith

Violation of New Jersey Consumer Fraud ACT (CFA)

Tortious Interference with Contract

By signing below, I certify that this application is made in good faith, and not for any improper purpose such as to harass or to cause unnecessary delay or expense. I further certify that the factual statements contained in this application are true to the best of my knowledge.

Date: 3/10/2016

Veronica A. Williams

Print/Type Name of Attorney or Self-Represented Litigant

Signature of Attorney or Self-Represented Litigant

Superior Court of New Jersey  
Appellate Division  
**Disposition on Application for Permission to File Emergent Motion**

Case Name: Veronica Williams v. Litton Loan Servicing, HSBC Bank USA, NA, Goldman Sachs, Ocwen, Fremont Home Loan  
Appellate Division Docket Number: (if available): Trust 2006-C Mortgage-Backed Certificates, Series 2006-C, and  
Stern & Eisenberg, PC  
Trial Court or Agency Below: \_\_\_\_\_  
Trial Court or Agency Docket Number: ESSEX L - 004753-13

**DO NOT FILL IN THIS SECTION – FOR COURT USE ONLY**

I. The application for leave to file an emergent motion on short notice is **Denied** for the following reasons:

- ☐ The application on its face does not concern a threat of irreparable injury, or a situation in which the interests of justice otherwise require adjudication on short notice. The applicant may file a motion with the Clerk's Office in the ordinary course.
- ☐ The threatened harm or event is not scheduled to occur prior to the time in which a motion could be filed in the Clerk's Office and decided by the court. If the applicant promptly files a motion with the Clerk's Office it shall be forwarded to a Panel for decision as soon as the opposition is filed.
- ☐ The applicant did not apply to the trial court or agency for a stay, and obtain a signed court order, agency decision or other evidence of the ruling before seeking a stay from the Appellate Division.
- ☐ The application concerns an order entered during trial or on the eve of trial as to which there is no prima facie showing that the proposed motion would satisfy the standards for granting leave to appeal.
- ☐ The timing of the application suggests that the emergency is self-generated, given that no good explanation has been offered for the delay in seeking appellate relief. Due to the delay, we cannot consider a short-notice motion within the time frame the applicant seeks, without depriving the other party of a reasonable time to submit opposition. And the magnitude of the threatened harm does not otherwise warrant adjudicating this matter on short notice despite the delay. If the applicant promptly files a motion with the Clerk's Office it shall be forwarded to a Panel for decision as soon as the opposition is filed.
- ☐ Other reasons:

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March 10, 2016

JAD

Date



Superior Court of New Jersey  
Appellate Division  
Docket No. (2) Essex L – 004753-13

(1) Veronica A. Williams

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(3) \_\_\_\_\_

Notice of Motion for

(4) Leave to Appeal Since Litton Loan is Still Open

\_\_\_\_\_

v.

Litton Loan Servicing, HSBC Bank USA,  
NA, Goldman Sachs, Ocwen, Fremont Home

Loan Trust 2006-C Mortgage-Backed Certificates,  
Series 2006-C, Stern & Eisenberg, PC

To: (5) \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

PLEASE TAKE NOTICE that the undersigned hereby moves before the Superior Court of New Jersey, Appellate Division, for an Order

(6) to allow leave to appeal since Litton Loan action is still open

\_\_\_\_\_  
\_\_\_\_\_

In support of this motion, I shall rely on the accompanying brief. (7)

(8) April 12, 2016

(Date)

(9) \_\_\_\_\_

(Signature)

(10) \_\_\_\_\_

I hereby certify that I am mailing or delivering the original and four copies of this notice of motion and accompanying brief to the Clerk of the Appellate Division and mailing or delivering two copies of the same to the following:

(11) Mr. Stuart I. Seiden, Duane Morris LLP, 30 S. 17th St.,  
Philadelphia, PA 19103-4196

\_\_\_\_\_  
\_\_\_\_\_

(12) April 12, 2016

(Date)

(13) \_\_\_\_\_

(Signature)

(14) \_\_\_\_\_

April 19, 2016

Superior Court of New Jersey  
Appellate Division Clerk's Office  
P.O. Box 006  
Trenton, New Jersey, 08625

**Download this submission at**  
**[www.FinFix.org/Appeal-NJ.pdf](http://www.FinFix.org/Appeal-NJ.pdf)**

Re: Plaintiff's Appeal of Judge's Decision on Defendants' Motion for Summary Judgment  
Case [NJ DOCKET NO. ESSEX-L-004753-13](#)

Dear Officers of The Court:

The Superior Court of New Jersey – Essex Vicinage (Essex County Court) has handled this case inappropriately and the Plaintiff's counsel may have provided subpar defense. This is validated by a review of the case file, recent settlements by 2 defendants with the U.S. Department of Justice (DOJ), information presented in this appeal and facts to be presented at the upcoming trial. This matter demands that the Appellate Court take over and schedule a long overdue jury trial.

## **TWO DEFENDANTS PAY BILLIONS FOR SAME CHARGES CLAIMED BY PLAINTIFF**

***Essex County Court – After 6 Years, No Jury Trial***

***U.S. Dept. of Justice – After 9 months, Record Setting Settlements with 2 Defendants***

### **HSBC Settlement Agreement Excerpt (complete agreement enclosed):**

- ♦ The intention of the United States and the States in effecting this settlement is to remediate harms allegedly resulting from the alleged unlawful conduct of the Defendants
- ♦ to provide cash payments to borrowers whose homes were finally sold or taken in foreclosure by Defendants between and including January 1, 2008 and December 31, 2012
- ♦ relief to consumers

### **Goldman Sachs Settlement Agreement Excerpt (complete agreement enclosed):**

- ♦ the United States believes that there is an evidentiary basis to compromise potential legal claims by the United States against Goldman Sachs for violations of federal laws in connection with the marketing, structuring, arrangement, underwriting, issuance, and sale of RMBS.
- ♦ of consumer relief to remediate harms resulting from alleged unlawful conduct of Goldman Sachs,
- ♦ the activities where the representation, disclosure, or non-disclosure involves information about or obtained during the process of originating, acquiring, securitizing, underwriting, or servicing residential mortgage loans
- ♦ common law theories of negligence, gross negligence, payment by mistake, unjust enrichment, money had and received, breach of fiduciary duty, breach of contract, misrepresentation, deceit, fraud, and aiding and abetting any of the foregoing

Copies of the settlement agreements that HSBC and Goldman Sachs executed with the United States Department of Justice are enclosed with this appeal.

The Plaintiff first attempted to resolve "errors" by the defendants in 2006. After repeated deception with no resolution, the Plaintiff filed a complaint with the Essex County Court in 2010. After 6 years of legal calisthenics and expenses the Plaintiff has not had her day in front of a jury of her peers. Yet, after advising Federal Agencies on her case (2011 – 2015), and DOJ opening an investigation in 2015, two defendants reached settlements that included the same charges levied by the Plaintiff

## INAPPROPRIATE ACTIONS BY ESSEX COUNTY COURT

Based upon what I have endured and a review of the case files, I have identified numerous actions by the Essex County Court that were inappropriate. These include, but are not limited to:

- Non-Jury Hearings Despite Repeated Demands for Jury Trial (multiple times in case file)
- Hearings Scheduled Without Notifying Plaintiff
- Per Se Plaintiff Barred From Hearing (1/23/15), Counsel That Had Been Removed (12/8/14 Case File) Allowed to Represent Plaintiff Over Plaintiff's Verbal and Written Objections (proof available)
- Orders Imposed Without Reading Discovery or Motion for Proof Hearing or listening to Witness Testimony
- Dismissed Defendants Without Plaintiff's Knowledge or Input (case file 11/22/13 Orders by Judge Chiocca)
- Six Judges Assigned to this Legal Effort including Four Assigned to Docket No. L-004753-13
- Documents Missing From Case File (see pp. 60 – 61)

## KEY POINTS SUPPORT CHARGES AGAINST ALL DEFENDANTS

My appeal to present this matter to a jury, with all defendants and counts as originally filed, should be granted. There are several key points that support *at least* a violation of Breach of Contract and the New Jersey Consumer Fraud ACTs against all defendants:

- **Fremont Investment and Loan:**
  - Did not file required documents with the State of New Jersey, Essex County Hall of Records
  - Was issued, *and violated*, a cease-and-desist order issued by the U.S. Department of Justice on 3/8/07 (Motion Proof Hearing **Ex-B-28: [Article](#)**)
  - Presented false documents via their attorney in their response to my Motion filed Feb. 17, 2016 (p. 156- 162 & p. 117 ) C:\CriticalFiles\CURRENT\_Post2010\Veronica Williams\Legal\_Prepaid\Case\_LittonLoan\COURT\_DuaneMorris\_Williams-Motion-for-Summary-Judgment-filed\_recvd\_2-18-16.pdf & [http://www.fifix.org/proof/VWDS/COURT\\_DuaneMorris\\_Williams-Motion-for-Summary-Judgment-filed.pdf](http://www.fifix.org/proof/VWDS/COURT_DuaneMorris_Williams-Motion-for-Summary-Judgment-filed.pdf)
- **HSBC pierced the corporate veil:** Mr. Seiden told me during his deposition of me during the summer of 2014 that HSBC was paying for the legal defense and represented all defendants. When I told Mr. Messinger immediately after our Feb. 19<sup>th</sup> hearing that HSBC was paying legal fees, he responded with surprise and chagrin, "How did you know that??!!"
- **Goldman Sachs: the corporate veil was pierced and arms-length removed** when they advised Radian on the acquisition of Enhance Financial Services, the owner of Litton Loan at the time. (Motion Proof Hearing - Timeline 1996 & 2-17-1999 & 11-1-2000 & 11-14-2000 & 1-12-2001 & 2-26-2002 & 12-27-2000 & 12-11-2007 & 11-21-2007 & 12-2007 & 2007 - p. 11 [download](#))
- **Defamation by David M. Lambropoulus, Stern & Eisenberg, PC** (Motion Proof Hearing **Ex-B-49: [download](#)**)
- Moreover, **fraud by Litton Loan began in 2006**; see Loan Amortization (Motion Proof Hearing Timeline p. 12, 12-31-14 & **Ex-B-52 p. 104** (Ex3: [PROOF](#) & [PROOF](#))). **Litton Loan and Fremont wrapped Plaintiff's mortgages with additions to principal using improper actions. This was validated in a 10/27/14 deposition of Kevin Flannigan, an Ocwen employee and former Litton Loan employee.**

## NO DEFENDANTS SHOULD HAVE BEEN REMOVED

**None of the defendants should have been removed.** Yet, Litton was the only defendant considered at the Feb. 19, 2016 Hearing.

Many legal professionals have told me that the scope of this matter is quite broad and complex. This order (pp. 30 – 46) is narrowly defined by the points presented on Feb. 19, 2016 by Mr. Messinger, the Defendants' attorney. I refuted Mr. Messinger's position but never had an opportunity to address the points presented in the Motion that I submitted on Feb. 17, 2016. There is so much more documentation presented in the Discovery Document, Motion for Proof Hearing, Response to Defendant's Motion received Feb. 18, 2016, Plaintiff's Motion submitted Feb. 17, 2016 and other relevant documents. The scope and complexity of this matter cannot be adequately addressed through a series of hearings. I, again, insist that the Superior Court of New Jersey quickly schedule the jury trial that I have sought since 2010.

The Plaintiff does not object to the removal of Powers Kirn.

## IN SUMMARY

The defendants' fraud against me started in 2006 (see summarized, excerpt Timeline p. 27). Rather than act in good faith to resolve my objections to their fraudulent actions, the defendants made false commitments and sold my mortgage amongst themselves three (3) times in just a few years! After repeatedly reneging on their word, the defendants forced me to take legal action in 2010. Since I filed the first legal complaint, the defendants have driven up legal expenses and imposed unacceptable delays. I deserved my day in court in 2011. With only 48 hours' notice I prepared for and appeared before Judge Mitterhoff on Feb. 19, 2016, and was granted a single count against the only remaining defendant. I was not notified of the hearing on Feb. 19, 2016. I learned of the hearing when I stopped by to give Judge Mitterhoff a copy of a motion I had just filed. With a little more notice and the ability to have my selected witnesses heard during a jury trial, I am confident that I will prevail on multiple accounts against all defendants. As a citizen I am entitled to a speedy trial in front of a jury of my peers. **Ten years is much too long.** This appeal is to request that the appellate court schedule a jury trial at the earliest possible date. See pp. 22 – 23 & 24 – 44 for explanation.

I request reconsideration of these orders and a written response. Please send your response to Veronica Williams, PO Box 978, South Orange, NJ 07079-0978 and, if possible, via email at [StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com) or via facsimile to 888-492-5864.

Thank you,

Veronica Williams

cc: Superior Court of New Jersey, Essex County Veterans Courthouse, Room 131 via US Mail  
Judge Stephanie Ann Mitterhorf via facsimile to 973-424-2437  
Stuart Seiden, Duane Morris via US certified mail & email to  
Brett L. Messinger, Partner, Duane Morris via email to

## ATTACHMENT I

### Plaintiff Denied Due Process – Inappropriate Court Actions

The Plaintiff has been denied due process. The Court has made inappropriate decisions. In addition to scheduling a jury trial expeditiously the Appellate Division should decide what remedial action is required.

#### PER SE PLAINTIFF REFUSED ADMITTANCE TO HEARING

Judge Mitterhoff refused to allow the Plaintiff to attend the Jan. 15, 2015 Hearing. This was despite the fact that Denbeaux and Denbeaux stopped communicating with Plaintiff and the Plaintiff had accepted the withdrawal of Denbeaux and Denbeaux in Sept. 2014. More importantly, Plaintiff's previous counsel filed a Substitution of Counsel on 12/8/14. The Jan. 15, 2015 hearing was not recorded and Plaintiff has not received a copy of the Order. Acting per se and with less than 48 hours' notice, the Plaintiff achieved a partial reversal in a short 30 minute hearing on Feb. 19, 2016. Had the Plaintiff received adequate representation by counsel, the defendants would have been found guilty of the charges in this action.

#### OPINION VALIDATES LACK OF UNDERSTANDING – PLAINTIFF COULD HAVE EXPLAINED

In an Opinion decided by Judge Mitterhoff, J.S.C, it is written "Plaintiff is sophisticated in business matters and has over 30 years of financial experience." (Opinion, Jan. 23, 2015)". **CHECK DATES IN THIS OPINION.** Yet it would be another thirteen months before I – *just by chance* – appeared before Judge Mitterhoff. Even then, I was only allowed to present my position to a severely narrowed scope of my initial complaint.

With pride, I earned a MBA in Finance and Economics from Northwestern University's Kellogg Graduate School of Management in 1979. I further validated my 30 years of expertise in Finance, Economics, Process Improvement and Management Strategy when I earned the PgMP, PMP and ITIL credentials in 2009 and 2010. Through a strong track record in business, corroborated by Federal Contracts, speaking engagements and publications, I earned global recognition as one of the top 1,000 experts in business and technology. I am also one of 6,400 arbitrators heavily vetted by the SEC to serve the Financial Industry Regulatory Authority (FINRA). Even without my credentials and achievements, as a citizen I have the right to due process. I also have the right to present my case in front of a jury of my peers. Essex County Court repeatedly denied me due process.

#### DEFENDANTS' LEGAL CALISTHETICS ELEVATE COST & EXTEND PROCESS

When the defendants chose to use money, power and insults in an effort to defeat me, I grew more determined and stronger (Exodus 1:12). **SIX** Judges have been assigned to my legal effort to seek justice for the defendants' fraudulent and damaging actions, including **FOUR** – that I know of – have been assigned to this docket number-004753-13. Since the Essex County Courts refused me due process, over and over, I turned to our Federal Government. It was clear that the magnitude of fraud was so widespread that I was among millions who have lost massive amounts of money.

Since 2009 I have made formal requests to every bar association in New Jersey, and I approached current and former NJ attorneys including whom I know and those to whom I was referred. Attorneys were afraid to take my case. As a US citizen, I was obligated to reveal and correct these wrongdoings ["Ask not what your country can do for you, ask what *you* can do for your country" John F. Kennedy (JFK) Inaugural Address, January 20, 1961]. I advised several Federal agencies of the defendants' actions. While the defendants' worked continually to shut me down, they were also working on settlements with the United States Department of Justice for their wrongdoing. What a flagrant act of duplicity.

#### PLAINTIFF'S JURY TRIAL LONG OVERDUE

My complaint included a demand for a jury trial. After reviewing the case file in detail, I did not find any documents approving a non-jury trial. Moreover, Judge Cocchia and Judge Mitterhoff rendered decisions without a hearing and without allowing the Plaintiff to present her case. I will leave it up to the Appellate Court to determine if this was a miscarriage of justice, an abuse of power, or an acceptable series of mistakes.

## RESPONSE TO EACH SECTION IN ORDER

### STATEMENT OF FACTS

Before the court is a motion for reconsideration of the court's January 23, 2015 Order partially granting Defendants' motion for summary judgment. Plaintiff's claims center around allegations that employees of Litton Loan Servicing (Litton), promised her that she could obtain a favorable modification of her loan if she defaulted on her mortgage payments. **[NOT TRUE. MY CLAIM DOES NOT "CENTER AROUND" THE MODIFICATION. MY CLAIMS STARTS WITH AN UNAPPROVED ADDITION TO THE PRINCIPAL BALANCE OF MY MORTGAGE BY LITTON LOAN IN 2006. I NEVER RECEIVED \$208,000 FROM FREMONT AND THEY WERE ISSUED A CEASE AND DESIST FROM THE U.S. DEPT. OF JUSTICE BEFORE PAYING THE FULL AMOUNT DUE ME. MY CLAIM SHOWS THAT THE FREMONT MORTGAGE IS NOT VALID. MY CLAIM SHOWS I SOUGHT THE MODIFICATION IN LIEU OF A COURT BATTLE.]** In reliance on those representations, Plaintiff claims she intentionally failed to make several payments on her mortgage. **[THIS WAS DONE AT THE INSTRUCTION OF THE DEFENDANTS]** Soon after, Litton sent Plaintiff written offers for modification, on three separate occasions, that were all contingent on her submitting proof of income and paying three month trial payment amounts. Plaintiff failed to comply with those contingencies and as a result Plaintiff was not able to modify her mortgage. **[THIS IS NOT TRUE. DISCOVERY DOCUMENT PROVES THAT PLAINTIFF COMPLIED WITH EACH CONTINGENCY]** Plaintiff claims that the default on her mortgage has caused her to lose her security clearance, which



precluded a lucrative contract with FEMA which Plaintiff claims she would have received if she maintained the security clearance. **[NOT EXACTLY TRUE.**

**PLAINTIFF LOST THE NON-LUCRATIVE FEMA JOB OFFER WHICH WOULD HAVE GIVEN ME THE SECURITY CLEARANCE AND PAST PERFORMANCE NECESSARY TO CLOSE TASK ORDERS ON AN EXISTING FEDERAL SUPPLY CONTRACT THAT HAD BEEN AWARDED TO PLAINTIFF'S COMPANY]**

The facts are as follows: on March 27, 2006, Plaintiff, Veronica Williams, took out a loan secured by a mortgage on her house in the amount of \$261,000. On November 9, 2007, the loan was modified to a fixed interest rate of 7.250%, with an unpaid principal balance of \$295,892.58. **[FREMONT DID NOT DISBURSE THE FULL AMOUNT OF FUNDS BORROWED!!** See Loan Amortization (Motion Proof Hearing Timeline p. 12, 12-31-14 & **Ex-B-52 p. 104** (Ex3: [PROOF](#) & [PROOF](#)))]**]** The loan was held by Defendant Fremont Home Loan Trust 2006-C Mortgage-Backed Certificates (Fremont Trust). Defendant HSBC Bank is the Trustee for Fremont Trust. **[HSBC IS ALSO THE UNDERWRITER FOR THE FREMONT LOAN AND IS PAYING THE LEGAL FEES FOR ALL DEFENDANTS]**

Defendant Litton Loan Servicing (Litton) serviced the loan. In December 2007, Defendant Goldman Sachs acquired ownership of Litton. Plaintiff testified that she wanted to modify her mortgage and she first contacted Litton in 2008. **[PLAINTIFF DID NOT FIRST CONTACT LITTON. PLAINTIFF FIRST CONTACTED CHASE, WHO OFFERED A LOWER RATE BUT HIGHER PRICED LOAN. PLAINTIFF THEN CONTACTED LITTON; REPRESENTATIVES TOLD**

**PLAINTIFF WHY IT WAS BEST TO STAY WITH LITTON BY ACCEPTING**

**A MODIFICATION]** Plaintiff testified that she told Litton that she would seek to refinance her mortgage with another lender but "they said, we can do the same thing. Do it with us." Seiden Ex. E. T32:3-7. Plaintiff testified that a person at Litton told her that "to get the program you want, get you the best deal, you have to be three months in arrears. So I didn't pay based on their instruction." Id. T:32:17-20; T75:6-

**10. [ THIS IS A STANDARD PRACTICE BY MORTGAGE PROVIDERS  
AND HAS BEEN SUGGESTED BY OTHER MORTGAGE FIRMS]**

Plaintiff defaulted on April 1, 2009. In a letter dated May 28, 2009, Litton sent Plaintiff an offer to enter into a modification program which explained that she needed to (1) complete a hardship affidavit (2) submit required documentation of her income and (3) make timely monthly trial period payments. The letter invited Plaintiff to accept the offer by informing them no later than June 11, 2009. The letter explained that if her income documentation did not support the income amount "previously provided in our discussions," her monthly payments under the plan could change or she may not qualify for the modification program. According to Defendants, in a July 31, 2009 phone call, Williams refused to submit the financial information required under the initial workout plan. **[THIS IS ABSOLUTELY**

**NOTE TRUE AND VALIDATED BY DOCUMENTATION PROVIDED IN  
DISCOVERY DOCUMENT]** At her deposition, Williams testified that she provided

Litton everything needed to review her request for a loan modification but that

**Litton defrauded her by "asking for information over and over." [NOT TRUE.**

**LITTON DEFRAUDED ME BY NOT PROVIDING THE**

The court concluded that, based on its reading of the agreement, it was a unilateral offer, pursuant to which the bank promised to give plaintiffs a loan modification, "if and only if plaintiffs complied fully and timely with their obligations under the TPP, including making all payments timely and providing documentation establishing that the financial representations they made to the bank in applying for the TPP were accurate when made and continued to be accurate." **[PLAINTIFF FULLY AND TIMELY COMPLY WITH EVERY REQUEST; DEFENDANTS INCREASED THE AMOUNT REQUESTED AFTER RECEIVING MY CHECKS!!]** Arias, *supra*, 439 N.J. Super. at 279. Accordingly, because the record clearly established that the plaintiffs had failed to comply with the payment schedule and had not submitted the required financial documentation, the court held that the bank was justified in refusing to give them a loan modification and dismissed the complaint.

**Litton Loan gave the Federal Reserve information that was *just not true*. Litton confirmed that I would receive in house modification, over and over. Litton also received 3 checks in the amount they indicated they needed. Litton received the checks again, with an additional amount requested, in October 2009. Proof has been submitted to the State of New Jersey and to the U.S. Department of Justice. In light of this and other false information, Goldman Sachs and Litton Loan were served by me weeks after this letter was written.**

Since you were not approved for HAMP, Litton agreed to review your loan for an in-house modification. The process for this non-HAMP modification required you to resubmit a new application and enter into a new trial payment period, pursuant to the notice Litton sent to you on March 16, 2010. According to that notice, to accept the modification you needed to make three trial payments of \$3,333.55 on May 1<sup>st</sup>, June 1<sup>st</sup>, and July 1, 2010, respectively, in place of your normal monthly mortgage payments. As of August 9, 2010, Litton had not received any of the trial payments required for the non-HAMP modification; therefore, Litton denied your modification request in its letter to you dated August 9, 2010.

**SOURCE: Federal Reserve letter from Adam Dombrow, Examining Officer, retired  
Williams added Goldman Sachs to Complaint 7/28/11** [http://finfix.org/proof/DD/VW\\_FinalComplt\\_8-5-11\\_vw.pdf](http://finfix.org/proof/DD/VW_FinalComplt_8-5-11_vw.pdf)

Appealed to NJ Banking Commission, SEC, Federal Reserve & others (Ex32: **PROOF** ([http://finfix.org/proof/DD/FedReserve\\_VWvsLitton1.pdf](http://finfix.org/proof/DD/FedReserve_VWvsLitton1.pdf)) Ex33: **PROOF** (\_\_\_\_) & Ex7: **WITNESSES** (\_\_\_\_) p. 159  
documentation filed with NJ Superior Court & US DOJ at [http://www.finfix.org/proof/VWDS/UPDATE\\_5-29-15.pdf](http://www.finfix.org/proof/VWDS/UPDATE_5-29-15.pdf)

either did not consider, or failed to appreciate the significance of probative, competent evidence. Cummings, supra, 295 N.J. Super. at 384.

Therefore, for the foregoing reasons, the court will again deny summary judgment on Plaintiff's breach of contract and CFA claims as to Defendant Litton.

The court will, however, grant summary judgment as to all of the other named Defendants, namely, HSBC, Freemont Home Loan Trust, Goldman Sachs, Ocwen, Stem & Eisenberg, and Powers Kirn LLC. Plaintiff has failed to show the existence of a genuine question of material fact relating to the involvement of these entities or their liability in this matter. From what has been submitted to the court, it is clear that it was Litton's alleged conduct, alone, that formed the basis for Plaintiff's breach of contract and CFA claims.

**WITNESSES AND PROOF PRESENTED AT TRIAL  
WILL PROVE THAT HSBC AND GOLDMAN  
SACHS HAVE PIERCED THE CORPORATE VEIL  
AND SHOULD BE INCLUDED AS DEFENDANTS**

**CONCLUSION**

In conclusion, for the foregoing reasons, Defendants' motion to reopen Counts II and III is granted. Defendants' motion for the court to reconsider its prior order and to grant summary judgment on those claims is granted in part and denied in part. Summary judgment is granted as to all Defendants other than Litton. Summary judgment is denied as to Litton.

**PLAINTIFF'S MOTION  
FILED FEB. 17, 2016  
Page 1 of 105**

**WILLIAMS vs. HSBC, GOLDMAN SACHS, OCWEN, et. al.  
Superior Court of New Jersey DOCKET NO. ESSEX-L-004753-13  
U.S. Dept. of Justice Investigation No. 3017165  
Page 48 of 59**

**THIS COMPLETE DOCUMENT CAN BE DOWLOADED AT**

[http://www.finfix.org/proof/VWDS/COURT\\_Motion-to-Amend-Complaint\\_Feb-2016\\_forSeiden.pdf](http://www.finfix.org/proof/VWDS/COURT_Motion-to-Amend-Complaint_Feb-2016_forSeiden.pdf)

February 17, 2016

Superior Court of New Jersey  
Essex Vicinage – Finance Division  
Civil Central Processing Unit  
Room 131 Veterans Courthouse  
50 West Market Street  
Newark, NJ 07102

**As a show of good faith in their negotiations  
with the U.S. Dept. of Justice, HSBC and  
Goldman Sachs should discharge my mortgage  
and pay for the damages, pain and suffering  
they have caused me.**

Subject: Motion to Amend Complaint for, Case Docket ESSX L – 004753-13

Dear Officers of the Court,

This is my Motion to reinstate my default judgment or, *at the very least*, amend the complaint for Case Docket No. Essex-L-004753-13 by adding charges from my original complaint –**NJ DOCKET NO: ESSEX L-000081-11**– to this complaint and grant my jury trial. If I am forced to spend more time and money on a trial, I should be granted my motion to merge my complaints.

As directed by the Court staff, I have added the following forms to this motion:

- Filing Fee Waiver Request Pages 5 – 8
- Return of Documentation form Page 9
- Form B: Certification of Service Pages 10 – 11
- Form C: Civil Action Order Page 12
- Form A: Court Dates & Discovery End Date & Certification Regarding Attempts to Resolve Page 15
- Form B: Civil Action, Certification In Support of Motion Pages 16 – 17

A copy of this filing has been sent to the defendants' attorney, Mr. Seiden, via U.S. Mail Certified No. **7014 2120 0004 0860 5066** and email. As instructed by the Court, a self-addressed, stamped envelope is enclosed with this submission of the Motion to the Superior Court of New Jersey.

I am proceeding against doctors' advice so that I can prevent the defendants from stealing my property. I have a doctor and nurse who have agreed to attend hearings to assist me. I ask the court to adapt scheduling dates to their schedules.

**LAWYERS CONSUMED TIME & MONEY WITHOUT A TRIAL OR MEDIATION**

As a result of the defendants' actions, I had to withdraw my complaint and was not healthy enough to reopen it. So I retained Denbeaux and Denbeaux to represent me. They decided to file a new complaint rather than use my complaint. After my funds were exhausted, Denbeaux & Denbeaux withdrew as my attorney. One of their attorneys, Adam Deustch, also co-signed an erroneous document with the defendants' attorney (Discovery Ex-C: [Download](#)). They told me that they would work with Seiden to resolve this matter and we would not need a mediation. Had I not verified what I was told by Denbeaux & Denbeaux and Seiden, I would have lost my case by default. Due to the actions of all attorneys involved, my judgment should be reinstated or I should be allowed to continue my case by adding the charges that I believe are most effective and that I was originally prepared to argue.

**MORTGAGE FRAUD DRIVES FORECLOSURES**

New Jersey is not #2 in foreclosures nationwide only due to 9/11 and the hit to our economy. I expect that many homeowners had their principal balances unjustly increased as mine was. This is likely

**PLAINTIFF'S MOTION**  
**FILED FEB. 17, 2016**  
**Page 2 of 105**

**WILLIAMS vs. HSBC, GOLDMAN SACHS, OCWEN, et. al.**  
**Superior Court of New Jersey DOCKET NO. ESSEX-L-004753-13**  
**U.S. Dept. of Justice Investigation No. 3017165**  
**Page 49 of 59**

particularly true for Essex County, which has an extraordinarily higher number of residents over 50 years of age with high home equities like me.

In a deposition by my former attorney, an employee of Ocwen and former employee of Litton Loan admitted Litton Loan received mortgage payments that were not recorded. I have proof that my payments were picked up at a Federal Express office rather than delivered to Litton Loan's office.

I recreated the amortizations of each mortgage since I purchased my home in 1983. The amortizations are based upon filings of the mortgage firms with the Essex County Hall of Records and legal documents provided at closings. My amortizations also showed handoffs to each new mortgage firm. This master amortization schedule shows the defendants added \$208,000 to the principal of my mortgage (Discovery Ex3: [PROOF](#)). My home that was purchased for \$88,000 and Fremont only paid a small fraction of the advance.

I have read of at least one precedent in Florida, which ranks #1 in foreclosures in the US, where a homeowner was reportedly awarded \$20M for enduring less than I. I deserve my day in court.

**SEC FILINGS REVEAL PRIOR KNOWLEDGE & STEPS TO CONCEAL**

Countrywide and Litton Loan were once regarded as the most notorious mortgage servicing companies in the United States. Bank of America acquired Countrywide and spent considerable time and money cleaning up the Countrywide portfolio. Goldman Sachs was advisor to Radian (Proof Hearing Ex. B-23), the company that acquired Enhance Financial Services (Proof Hearing B-21), the company that owned Litton Loan. Litton Loan also passed through other firms (Proof Hearing B-19 & B-20). Litton Loan's public image was turned around but their improper mortgage servicing practices were not. Goldman Sachs later acquired Litton Loan from C-Bass, an affiliate of Radian and MGIC (Proof Hearing Ex. B-29). After I, and surely many others filed legal complaints, Goldman Sachs sold Litton's portfolio off to Ocwen. After Ocwen felt the heat, just a few years later, they sold the portfolio too. This is a disturbing and common trend. **Every company that has originated or serviced my mortgage over the past 33 years is out of business.** One of these firms, Fremont Investment and Loan, was shut down after the US DOJ issued them a cease and desist order (Proof Hearing Ex. B-28). Goldman Sachs gave credibility to Litton Loan which purchased my mortgage twice and, apparently, each time added to the principal! Now Goldman Sachs is only offering to pay \$5B to pay damages, a small pittance of their damages to others and a small fraction of what they are easily able to pay. This is a snapshot of the transaction history that set the stage for the defendants' complicity in erroneous mortgages. I will explain this entire history and process, including the financial tactics and inconsistencies, during trial.

**DOCTORS CONFIRM CRITICAL HEALTH CONDITION CAUSED BY DEFENDANTS**

Doctors will testify that I was hospitalized for stress and I almost lost my life on several occasions. During one hospitalization, that included days in critical care, many tests were run that ruled out all causes except stress. The stress was imposed by the defendants.

The defendants have engaged at least 5 firms over more than 6 years to silence me. Now they are settling with the Federal government for what they have done to me and other homeowners. I have witnesses who will testify that a foreclosure is certain denial of a security clearance. The defendants duplicitously foreclosed days before my clearance investigation was to have been completed. Having already achieved a favorable result of an investigation that allowed me access to highly classified Federal information (Exhibit A), and having successfully passed the extensive vetting process to become an arbitrator for the Financial Industry Regulatory Authority (FINRA), my clearance was all but *in the bag* when the defendants foreclosed. The clearance was necessary to start a job I had been offered by the U.S. Department of Homeland Security. The offer was



retracted and since that time, I have been denied countless jobs and contracts as my health declined.

### **STRONG ARMED INVESTIGATIVE TACTICS**

There are witnesses listed who threatened by business associates in an attempt to gain confidential information about me. There are others who used subversive tactics in an effort to gather similar information. These and other witnesses will be questioned about confidential medical information that was in the defendants' interrogatories.

Many NJ residents have surely lost their homes to mortgage fraud and other homeowners are still likely to become victims. Chase and Bank of America are among the banks that have paid for some of their damages. HSBC (formerly known as Hong Kong Shanghai Banking Corp.) and Goldman Sachs will be the next to pay. NJ should suspend all foreclosures by these banks until DOJ findings have been made public and reviewed by the NJ Banking Commission and the NJ Attorney General.

### **PLAINTIFF DESERVES HER JUDGMENT REINSTATED OR HER DAY IN COURT – NOW**

I have been trying to get my day in court with these defendants since 2010. More than 6 years later, they have driven me to welfare, ran away my lawyers, caused a relapse in the health condition they caused, and worse. Now I am back to representing myself. Six years is much too long. I am entitled to, and have earned, a quick and speedy trial.

If I had been granted my day in court earlier, the State of New Jersey would have preceded the U.S. Department of Justice (DOJ) in exposing and forcing the defendants to pay damages cause by their actions. I am certainly not the only New Jersey resident with a dog in this fight. Let us move forward with my trial so that I can recover damages and pave the way for others to do the same.


We have the expertise and fortitude in New Jersey to protect ourselves and not have to depend on the Federal government. We can lead; so let's show what we've got. I have. My witnesses will testify how I have been driven from prosperity to welfare, and worse, by these defendants. The details will be validated by my witnesses. We need to demonstrate the wisdom and courage to stand up for ourselves at the State and Local levels. ***We are Jersey Strong.***

The Discovery document (750 pages) filed for CASE [NJ DOCKET NO. ESSEX-L-004753-13](#) on November 16, 2014 and the Motion for Proof Hearing (201 pages) filed on Feb. 20, 2015 provide proof and corroboration for claims made in Case [NJ DOCKET NO. ESSEX-L-004753-13](#) and Case [NJ DOCKET NO: ESSEX L-000081-11](#). They should be considered part of this Filing. In addition to the court submission, these documents can be downloaded at [http://finfix.org/proof/DD/VW\\_vs\\_GS-et-al\\_To\\_Court-CIS\\_and\\_Complaint.pdf](http://finfix.org/proof/DD/VW_vs_GS-et-al_To_Court-CIS_and_Complaint.pdf) and [http://finfix.org/proof/DD/VW\\_FinalComplt\\_8-5-11\\_vw.pdf](http://finfix.org/proof/DD/VW_FinalComplt_8-5-11_vw.pdf), respectively. The Discovery document can be downloaded at [http://finfix.org/proof/DD/Discovery-Documents\\_ALL\\_11-18-14.pdf](http://finfix.org/proof/DD/Discovery-Documents_ALL_11-18-14.pdf) and the Motion for Proof hearing can be downloaded at [http://www.finfix.org/proof/DD/Motion-for-Proof-Hearing\\_SHARED.pdf](http://www.finfix.org/proof/DD/Motion-for-Proof-Hearing_SHARED.pdf). These documents were included in the document I submitted to the US Department of Justice. **The DOJ submission is 1,136 pages and can be downloaded at [http://www.finfix.org/proof/VWDS/UPDATE\\_5-29-15.pdf](http://www.finfix.org/proof/VWDS/UPDATE_5-29-15.pdf).** This document contains proof for this motion. I do not have the money to print this entire document so I request that you download it. A summary of these documents is provided below:

DOCUMENTS IN CASE FILE AT ESSEX COUNTY HALL OF RECORDS as of 4/19/16			
DOCUMENT TITLE	DATE ENTERED INTO COURT FILE	NUMBER OF PAGES COPIED	NUMBER OF PAGES TOTAL
Filing Fee Waiver Request 2/23/15	2/23/15	1	1
Plaintiff cannot attend Case Mgmt. – 3/18/15 & 3/24/15 letters & memo	3/18/15	3	14
Mitterhoff Denied Plaintiff's Motion for Proof Hearing	3/20/15	2	2
<b>MISSING:</b> Letter to US Attorney General dated 2/22/16 <a href="http://www.fifix.org/UPDATE_2-22-16.pdf">http://www.fifix.org/UPDATE_2-22-16.pdf</a>	NA	2	2
Plaintiff Cannot Attend Case Conference March 16, 2015	3/23/15	1	6
Plaintiff 2-pg Letter to US Attorney General dated 4/8/15 <a href="#">DOWNLOAD</a>	4/13/15	0	2
Order by Judge Mitterhoff 2-19-16.pdf	2/19/16	4	4
Notice of Defendants Motion to Reopen <b>FULL DOCUMENT MISSING:</b> Plaintiff's copy <b>345 pages</b> <small>C:\CriticalFiles\CURRENT_Post2010\Veronica Williams\Legal_Prepaid\Case_LittonLoan\ Court_NJ-Williams\Motion-for-Summary-Judgment-filed-by-Seiden.pdf</small>	1/22/16	2	
<b>MISSING: MOTION FILED BY PLAINTIFF FEB. 17, 2016</b> <a href="http://www.fifix.org/proof/VWDS/COURT_Motion-to-Amend-Complaint_Feb-2016_forSeiden.pdf">http://www.fifix.org/proof/VWDS/COURT_Motion-to-Amend-Complaint_Feb-2016_forSeiden.pdf</a>	2/17/16		
<b>MISSING: JUDGE MITTERHOFF'S ORDER ON DEFENDANT'S MOTION 14 pgs.</b>	2/19/16		
<b>MISSING: PLAINTIFF'S UPDATE TO US ATTORNEY GENERAL 2pgs.</b> <a href="http://www.fifix.org/UPDATE_2-22-16.pdf">http://www.fifix.org/UPDATE_2-22-16.pdf</a>	1/22/16		
<b>MISSING: DEFENDANTS' RESPONSE TO MOTION FILED BY PLAINTIFF FEB. 17, 2016</b> <small><a href="http://www.fifix.org/proof/VWDS/COURT_Judge-Mitterhoff-VW-Response-to-Opposition-Brief-to-Motion-to-Amend-Williams-As%20filed-recvd_2-24-16.pdf">http://www.fifix.org/proof/VWDS/COURT_Judge-Mitterhoff-VW-Response-to-Opposition-Brief-to-Motion-to-Amend-Williams-As%20filed-recvd_2-24-16.pdf</a></small>	2/23/16		
<b>MISSING: PLAINTIFF'S RESPONSE to Defendants' Opposition to Feb. 17, 2016</b> <small><a href="http://www.fifix.org/proof/VWDS/COURT_Motion-to-Amend-Complaint_Response-to-Opposition_Feb-2016.pdf">http://www.fifix.org/proof/VWDS/COURT_Motion-to-Amend-Complaint_Response-to-Opposition_Feb-2016.pdf</a></small>	2/24/16		
Order Judge Mitterhoff 3-4-16.pdf	3/4/16	2	2
Plaintiff fax requesting hearing transcript	3/7/16	0	2
<b>MISSING:</b> Filing Fee Waiver Request 3/9/16	3/9/16	1	
TOTAL		73	154

Proof that the 2/20/14 Motion for Proof Hearing was submitted is provided on the next page. Additional proof about missing documents is available.

## PROOF OF DELIVERY OF MOTION FOR PROOF HEARING




fedex.com | Ship | Track | Manage | Learn | Office/Print Services

### Your package has been delivered

Tracking # 772961099011

<b>Ship (P/U) date:</b> Friday, 2/20/15	<b>Delivery date:</b> Monday, 2/23/15 9:44 AM
ACT, Inc. NJ Office Attn V Williams ACT INC SOUTH ORANGE, NJ 07079 US	Delores Pellegrino Superior Court of New Jersey 50 West Market Street Room 131-Civil Central Proc Unit NEWARK, NJ 07102 US




Delivered

### Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number:	<u>772961099011</u>
Status:	Delivered: 02/23/2015 09:44 AM Signed for By: C.JACKSON
Reference:	Motion for Proof Hearing
Signed for by:	C.JACKSON
Delivery location:	NEWARK, NJ
Delivered to:	Receptionist/Front Desk
Service type:	FedEx Priority Overnight
Packaging type:	FedEx Envelope
Number of pieces:	1
Weight:	0.50 lb.
Special handling/Services:	Adult Signature Required Deliver Weekday

 Please do not respond to this message. This email was sent from an unattended mailbox. This report was generated at approximately 9:47 AM CST on 02/23/2015.

To learn more about FedEx Express, please go to [fedex.com](http://fedex.com)

All weights are estimated.

# **APPEAL OF FORECLOSURE JUDGMENT**

**Superior Court of New Jersey**

**Chancery Division**

**DOCKET NO. F – 000839-13**

**AND**

**MOTIONS TO WAIVE FEES**

**JUDGMENT AWARDED DECEPTIVELY  
*FOR A FRAUDULENT MORTGAGE***

**To Download Redacted Copy**

**[www.FinFix.org/Appeal F-000839-13.pdf](http://www.FinFix.org/Appeal_F-000839-13.pdf)**

## SUMMARY

I am submitting this motion to:

1. Vacate the Judgment Awarded on October 24, 2014
2. Dismiss the Fraudulent Mortgage Originated by Fremont Home Loan


The motion, as well as the appeal of the case *that is still ongoing* in the Superior Court of New Jersey, Law Division Docket No ESSEX-L-004753-13, with supporting documents, present an overwhelming preponderance of evidence to support this motion.

- Litton Loan and Fremont Home Loan added \$208,000 to the principal balance of the mortgage ATTACHMENT I : DISCOVERY EXHIBIT B – 49 & PROOF HEARING EXHIBIT B – 52
- Fremont Home Loan never paid out most of the funds from the refinance ATTACHMENT I : DISCOVERY EXHIBIT B – 49 & PROOF HEARING EXHIBIT B – 52
- Fremont never filed required documents with the State of New Jersey's Essex County Hall of Records
- Due to unscrupulous actions, Fremont Home Loan was run out of business by the US DOJ ATTACHMENT II Cease & Desist Order
- Fraud and Deception during this Foreclosure process seek to hide damages to homeowners in NJ and throughout the US that is likely in excess of \$85B EXCERPTS FROM TIMELINE & ADDL SUPPORTING DOCs pp. 34 & 35 – DOJ settlements
- The Plaintiff in this foreclosure case refused to intervene when Williams requested their help in 2009. Now they are paying legal fees for all defendants in my civil case ATTACHMENT III :
- Plaintiff's Attorney, David M. Lambropoulos, is guilty of defamation of character of defendant ATTACHMENT IV :

After advising multiple Federal agencies of what the defendants did to me, the United States Department of Justice opened an investigation into my case. Less than a year later, 2 defendants (HSBC & Goldman Sachs) reached historic settlements with DOJ. Six years after filing a legal complaint with the Superior Court of New Jersey, I still have not had a jury trial or even mediation, and the defendants have almost succeeded in stealing my home of 33 years.

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DOCUMENT TYPE	DOCUMENT TITLE	PAGE NO.
Summary		2
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Court Transcript Request		4
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Filing Fee Waiver Request		6
Certified Statement in Support of Motion for Leave to Proceed as an Indigent		7
<b>ADDITIONAL FORMS REQUIRED FOR APPEAL</b>		9 – 15
Notice of Appeal		10 – 11
Certification of Service		12
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Application for Permission to File Emergent Motion		15
Disposition on Application for Permission to File Emergent Motion		15
<b>APPEAL</b>		17 – 35
Letter of Explanation		17 – 19
Attachment I – Increased Principal by \$208,000		20
Attachment II – Cease & Desist		23
Attachment III – HSBC Duplicity		25
Attachment IV – Plaintiff Defames Defendant		28
Attachment V – Plaintiffs Settle with DOJ		32
Attachment VI – Plaintiff Attorney Denied Defendant		33
Attachment VII – Excerpts From Timeline		34
Attachment VIII – Additional Supporting Docs	<b>ACCESSED VIA HYPERLINKS</b>	35



 <div>New Jersey Judiciary Superior Court - Appellate Division NOTICE OF APPEAL</div>					
Type or clearly print all information. Attach additional sheets if necessary.		ATTORNEY / LAW FIRM / PRO SE LITIGANT (2)			
TITLE IN FULL (AS CAPTIONED BELOW): (1) HSBC Bank USA v Veronica Williams		NAME Veronica Williams			
		STREET ADDRESS 541 Scotland Road			
		CITY South Orange	STATE NJ	ZIP 07079	PHONE NUMBER 202-486-4565
		EMAIL ADDRESS StopFraud@vwilliams.com			
ON APPEAL FROM		TRIAL COURT OR STATE AGENCY (4)		TRIAL COURT OR AGENCY NUMBER (5)	
TRIAL COURT JUDGE (3) NA		Chancery Division		NA	
1)	Notice is hereby given that (6) <u>Veronica Williams</u> appeals to the Appellate Division from a <input checked="" type="checkbox"/> Judgment or <input type="checkbox"/> Order entered on <u>October 14, 2014</u> in the <input type="checkbox"/> Civil <input type="checkbox"/> Criminal or <input type="checkbox"/> Family Part of the Superior Court or from a <input type="checkbox"/> State Agency decision entered on _____.				
2)	If not appealing the entire judgment, order or agency decision, specify what parts or paragraphs are being appealed.				
3)	Have all issues, as to all parties in this action, before the trial court or agency been disposed of? (In consolidated actions, all issues as to all parties in all actions must have been disposed of.) <input type="checkbox"/> Yes <input type="checkbox"/> No If not, has the order been properly certified as final pursuant to R. 4:42-2? <input type="checkbox"/> Yes <input type="checkbox"/> No				
4)	For criminal, quasi-criminal and juvenile actions only: Give a concise statement of the offense and the judgment including date entered and any sentence or disposition imposed:				
5)	This appeal is from a <input type="checkbox"/> conviction <input type="checkbox"/> post judgment motion <input type="checkbox"/> post-conviction relief. If post-conviction relief, is it the <input type="checkbox"/> 1st <input type="checkbox"/> 2nd <input type="checkbox"/> other _____ specify				
6)	Is defendant incarcerated? <input type="checkbox"/> Yes <input type="checkbox"/> No Was bail granted or the sentence or disposition stayed? <input type="checkbox"/> Yes <input type="checkbox"/> No				
7)	If in custody, name the place of confinement:  Defendant was represented below by: <input type="checkbox"/> Public Defender <input type="checkbox"/> self <input type="checkbox"/> private counsel _____ specify				

HSBC Bank USA, Natl. Assoc., as Trustee for Fremont Home Loan Trust 2006-C,  
Mortgage-Backed Certificates, Series 2006-C vs. Veronica Williams et. al.  
Superior Court of New Jersey, Chancery Division Docket No. F – 000839-13

WILLIAMS vs. HSBC, GOLDMAN SACHS, OCWEN, et. al.  
Superior Court of New Jersey, Law Division Docket No ESSEX-L-004753-13

U.S. Dept. of Justice Investigation No. 3017165

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- 1) Notice of appeal and attached case information statement have been served where applicable on the following:

	Name	Date of Service
Trial Court Judge	NA	
Trial Court Division Manager	NA	
Tax Court Administrator	NA	
State Agency	NA	
Attorney General or Attorney for other Governmental body pursuant to <u>R. 2:5-1(a), (e) or (h)</u>	David M. Lazopoulos	May 17, 2016

Other parties in this action:

Name and Designation	Attorney Name, Address and Telephone No.	Date of Service
Plaintiff's Counsel	Stuart I. Seiden, 30 S. 17th St. Phila, PA 215-979-1141	5/17/16
Plaintiff's Counsel	Brett L. Messenger, 30 S. 17th St. Phila, PA 215-979-1508	5/17/16

- 2) Attached transcript request form has been served where applicable on the following:

Name	Date of Service	Amount of Deposit
Trial Court Transcript Office		
Court Reporter (If applicable)		
Supervisor of Court Reporters		
Clerk of the Tax Court		
State Agency		

- 3) Exempt from submitting the transcript request form due to the following:

- ☐ No verbatim record.
- ☐ Transcript in possession of attorney or pro se litigant (four copies of the transcript must be submitted along with an electronic copy).  
List the date(s) of the trial or hearing:
- ☐ Motion for abbreviation of transcript filed with the court or agency below. Attach copy.
- ☐ Motion for free transcript filed with the court below. Attach copy.

I certify that the foregoing statements are true to the best of my knowledge, information and belief.

I also certify that, unless exempt, the filing fee required by N.J.S.A. 22A:2 has been paid.

(14) May 15, 2016

DATE

(15)


SIGNATURE OF ATTORNEY OR PRO SE LITIGANT

HSBC Bank USA, Natl. Assoc., as Trustee for Fremont Home Loan Trust 2006-C,  
Mortgage-Backed Certificates, Series 2006-C vs. Veronica Williams et. al.  
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U.S. Dept. of Justice Investigation No. 3017165

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 <b>New Jersey Judiciary</b> <b>Superior Court - Appellate Division</b> <b>CIVIL CASE INFORMATION STATEMENT</b>																			
Please type or clearly print all information.																			
<b>TITLE IN FULL (1)</b>  HSBC Bank USA v. Veronica Williams	<b>TRIAL COURT OR AGENCY DOCKET NUMBER (2)</b>  Case Docket F – 000839-13																		
a. Attach additional sheets as necessary for any information below.																			
<b>APPELLANT'S ATTORNEY</b> EMAIL ADDRESS: <u>StopFraud@vswilliams.com</u>																			
<input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT <input type="checkbox"/> OTHER (SPECIFY) _____																			
<table border="1" style="width: 100%; border-collapse: collapse;"><tr><td colspan="2" style="font-size: x-small;">NAME</td><td colspan="2" style="font-size: x-small;">CLIENT</td></tr><tr><td colspan="2">Veronica A. Williams</td><td colspan="2">Veronica A. Williams</td></tr><tr><td style="font-size: x-small;">STREET ADDRESS</td><td style="font-size: x-small;">CITY</td><td style="font-size: x-small;">STATE</td><td style="font-size: x-small;">ZIP</td><td style="font-size: x-small;">TELEPHONE NUMBER</td></tr><tr><td>541 Scotland Road</td><td>South Orange</td><td>NJ</td><td>07079</td><td>202-486-4565</td></tr></table>		NAME		CLIENT		Veronica A. Williams		Veronica A. Williams		STREET ADDRESS	CITY	STATE	ZIP	TELEPHONE NUMBER	541 Scotland Road	South Orange	NJ	07079	202-486-4565
NAME		CLIENT																	
Veronica A. Williams		Veronica A. Williams																	
STREET ADDRESS	CITY	STATE	ZIP	TELEPHONE NUMBER															
541 Scotland Road	South Orange	NJ	07079	202-486-4565															
<b>RESPONDENT'S ATTORNEY *</b> EMAIL ADDRESS: _____																			
<table border="1" style="width: 100%; border-collapse: collapse;"><tr><td colspan="2" style="font-size: x-small;">NAME</td><td colspan="2" style="font-size: x-small;">CLIENT</td></tr><tr><td colspan="2">David M. Lambropoulos, Stern &amp; Eisenberg</td><td colspan="2">HSBC Bank USA</td></tr><tr><td style="font-size: x-small;">STREET ADDRESS</td><td style="font-size: x-small;">CITY</td><td style="font-size: x-small;">STATE</td><td style="font-size: x-small;">ZIP</td><td style="font-size: x-small;">TELEPHONE NUMBER</td></tr><tr><td>1581 Main Street, Suite 200</td><td>Warrington</td><td>PA</td><td>18976</td><td>(215) 572-8111</td></tr></table>		NAME		CLIENT		David M. Lambropoulos, Stern & Eisenberg		HSBC Bank USA		STREET ADDRESS	CITY	STATE	ZIP	TELEPHONE NUMBER	1581 Main Street, Suite 200	Warrington	PA	18976	(215) 572-8111
NAME		CLIENT																	
David M. Lambropoulos, Stern & Eisenberg		HSBC Bank USA																	
STREET ADDRESS	CITY	STATE	ZIP	TELEPHONE NUMBER															
1581 Main Street, Suite 200	Warrington	PA	18976	(215) 572-8111															
* Indicate which parties, if any, did not participate below or were no longer parties to the action at the time of entry of the judgment or decision being appealed.																			
<b>GIVE DATE AND SUMMARY OF JUDGMENT, ORDER, OR DECISION BEING APPEALED AND ATTACH A COPY:</b> October 14, 2014. Copy requested from Court.																			
<div><div>Are there any claims against any party below, either in this or a consolidated action, which have not been disposed of, including counterclaims, cross-claims, third-party claims and applications for counsel fees?</div><div><input type="checkbox"/> YES    <input type="checkbox"/> NO</div></div> <div><div>If so, has the order been properly certified as final pursuant to R. 4:42-2? (If not, leave to appeal must be sought. R. 2:2-4,2:5-6)</div><div><input type="checkbox"/> YES    <input type="checkbox"/> NO</div></div> <div><div>(If the order has been certified, attach, together with a copy of the order, a copy of the complaint or any other relevant pleadings and a brief explanation as to why the order qualified for certification pursuant to R. 4:42-2.)</div></div> <div><div>Were any claims dismissed without prejudice?</div><div><input type="checkbox"/> YES    <input type="checkbox"/> NO</div></div> <div><div>If so, explain and indicate any agreement between the parties concerning future disposition of those claims.</div><div>Nothing has been provided to the defendant in writing about this judgment.</div></div>																			
<div><div>Is the validity of a statute, regulation, executive order, franchise or constitutional provision of this State being questioned? (R. 2:5-1(h))</div><div><input type="checkbox"/> YES    <input type="checkbox"/> NO</div></div>																			
<b>GIVE A BRIEF STATEMENT OF THE FACTS AND PROCEDURAL HISTORY:</b> The defendant has not been made aware of any procedures and unable to obtain pertinent information in this matter until last week (about 5/12/16).																			

HSBC Bank USA, Natl. Assoc., as Trustee for Fremont Home Loan Trust 2006-C,  
Mortgage-Backed Certificates, Series 2006-C vs. Veronica Williams et. al.  
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U.S. Dept. of Justice Investigation No. 3017165

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1)	TO THE EXTENT POSSIBLE, LIST THE PROPOSED ISSUES TO BE RAISED ON THE APPEAL AS THEY WILL BE DESCRIBED IN APPROPRIATE POINT HEADINGS PURSUANT TO <u>R. 2:6-2(a)(5)</u> . (Appellant or cross-appellant only): Defendant's attorney assured her that the foreclosure would NOT proceed until the civil case (ESSEX L-004753-13) has been closed. The case is ongoing; defendant (who is the Plaintiff in the civil case) has submitted an appeal to the NJ Superior Court Appellate Division. This foreclosure was awarded without the defendant's knowledge.	
2)	IF YOU ARE APPEALING FROM A JUDGMENT ENTERED BY A TRIAL JUDGE SITTING WITHOUT A JURY OR FROM AN ORDER OF THE TRIAL COURT, COMPLETE THE FOLLOWING:  1. Did the trial judge issue oral findings or an opinion? If so, on what date? _____ <input type="checkbox"/> YES <input type="checkbox"/> NO  2. Did the trial judge issue written findings or an opinion? If so, on what date? _____ <input type="checkbox"/> YES <input type="checkbox"/> NO  3. Will the trial judge be filing a statement or an opinion pursuant to <u>R. 2:5-1(b)</u> ? <input type="checkbox"/> YES <input type="checkbox"/> NO  Caution: Before you indicate that there was neither findings nor an opinion, you should inquire of the trial judge to determine whether findings or an opinion was placed on the record out of counsel's presence or whether the judge will be filing a statement or opinion pursuant to <u>R. 2:5-1(b)</u> .  DATE OF YOUR INQUIRY: _____	
1)	1. IS THERE ANY APPEAL NOW PENDING OR ABOUT TO BE BROUGHT BEFORE THIS COURT WHICH:	
2)	(A) Arises from substantially the same case or controversy as this appeal? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
3)	(B) Involves an issue that is substantially the same, similar or related to an issue in this appeal? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
4)	2. WAS THERE ANY PRIOR APPEAL INVOLVING THIS CASE OR CONTROVERSY? <input type="checkbox"/> YES <input type="checkbox"/> NO	
5)	IF THE ANSWER TO EITHER 1 OR 2 ABOVE IS YES, STATE: Case Name: Appellate Division Docket Number: Veronica Williams v. HSBC Bank USA, Goldman Sachs, Litter Loan, A2981-15 Ocwen, Stern & Eisenberg, et. al.	
6)	Civil appeals are screened for submission to the Civil Appeals Settlement Program (CASP) to determine their potential for settlement or, in the alternative, a simplification of the issues and any other matters that may aid in the disposition or handling of the appeal. Please consider these when responding to the following question. A negative response will not necessarily rule out the scheduling of a preargument conference.  State whether you think this case may benefit from a CASP conference. <input type="checkbox"/> YES <input type="checkbox"/> NO Explain your answer:	
7)	I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).  (17) <u>Veronica Williams</u> (18) <u>Veronica Williams</u> Name of Appellant or Respondent Name of Counsel of Record (or your name if not represented by counsel)  (19) <u>May 16, 2016</u> (20) _____ Date Signature of Counsel of Record (or your signature if not represented by counsel)	

*Veronica Ann Williams*

Mailing Address: P.O. Box 978 ♦ South Orange, NJ 07079-0978  
Residence—NO MAIL: 541 Scotland Rd ♦ South Orange, NJ 07079-3009

May 17, 2016

Superior Court of New Jersey  
Appellate Division Clerk's Office  
P.O. Box 006  
Trenton, New Jersey, 08625

**Download this submission at**  
**[www.FinFix.org/Appeal-NJF.pdf](http://www.FinFix.org/Appeal-NJF.pdf)**

Re: Plaintiff's Appeal of Judgment on October 24, 2014  
NJ Superior Court Chancery Division Case Docket No. F – 000839-13

Dear Officers of The Court:

I just learned last week that this judgment had been granted on 10/24/14. I was also told that, according to the record, it was uncontested. **THAT IS ABSOLUTELY NOT TRUE!!** My determination to explain the magnitude of the fraud imposed by HSBC, Goldman Sachs, Litton Loan and their associate firms upon me and others is clear by the intensity of the protracted battle I have engaged in since 2006. I have fought through life threatening illness and financial ruin, all imposed by HSBC and their allies, to have my day in front of a jury. The Plaintiff's attorney, Mr. Lambropoulos, is well aware of this (documented herein).

#### **DEFENDANT WILLIAMS HAS FOUGHT FRAUDULENT MORTGAGE SINCE 2006**

I have always contested all foreclosure attempts and filed a legal complaint against parties involved in this fraud in 2010. I was awarded a default judgment in Nov. 2014 against all defendants and another partial judgment in 2016. My former attorneys, Denbeaux and Denbeaux, assured me that the foreclosure action would be *on hold* until my civil action was concluded. The irrefutable evidence in my civil action shows that the defendants are guilty of fraud.

Proceeding with this foreclosure shows they are also duplicitous, using fraud and unscrupulous legal tactics to conduct theft. The defendants engaged their attorneys to conduct a protracted legal effort to allow them (i.e. the defendants) to avoid the responsibility for their actions. The attorney representing the plaintiff, HSBC Bank USA, is one of the defendants in my civil action. The attorney representing all of the defendants in my civil action is being paid by HSBC. Any reasonable person would expect that the communication between these attorneys prompted them to influence the change my position to "uncontested" and fast track the foreclosure judgment awarded on October 24, 2014 (**10/24/14**). Denbeaux and Denbeaux notified me on October 23, 2014 (**10/23/14**) that they were withdrawing as counsel but were not officially removed as my counsel by the NJ Superior Court until December 8, 2014 (**12/8/14**).

#### **DEFENDANT WILLIAMS REPEATEDLY NOT INFORMED OF COURT PROCEEDINGS**

It is only by the grace of God that I learned about the 2/19/16 hearing on 2/17/16, and that just last week I learned about the foreclosure judgment awarded on 10/24/14/.

## OVERWHELMING EVIDENCE

There are over 1,225 pages of documentation submitted to the Superior Court of New Jersey and the Office of the United States Attorney General. These documents show:

- Litton Loan and Fremont Home Loan added \$208,000 to the principal balance of the mortgage ATTACHMENT I: DISCOVERY EXHIBIT B – 49 & PROOF HEARING EXHIBIT B – 52
- Fremont Home Loan never paid out most of the funds from the refinance ATTACHMENT I: DISCOVERY EXHIBIT B – 49 & PROOF HEARING EXHIBIT B – 52
- Fremont never filed required documents with the State of New Jersey's Essex County Hall of Records
- Due to unscrupulous actions, Fremont Home Loan was run out of business by the US DOJ ATTACHMENT II CEASE & DESIST ORDER
- Fraud and Deception during this Foreclosure process seek to hide damages to homeowners in NJ and throughout the US that is likely in excess of \$85B EXCERPTS FROM TIMELINE & ADDL SUPPORTING DOCs pp. 34 & 35 – DOJ settlements
- The Plaintiff in this foreclosure case refused to intervene when Williams requested their help in 2009. Now they are paying legal fees for all defendants in my civil case ATTACHMENT III :
- Plaintiff's Attorney, David M. Lambropoulos, is guilty of defamation of character of defendant ATTACHMENT IV :

There is much more evidence demonstrating a serious, series of actions by the defendants that constitute depraved and systemic theft and fraud. Two of the defendants in my civil case, HSBC and Goldman Sachs, just this year reached historic settlements with the US DOJ due to extensive wrongdoing, including "HSBC: provide cash payments to borrowers whose homes were finally sold or taken in foreclosure by Defendants between and including January 1, 2008 and December 31, 2012" and "Goldman Sachs: consumer relief to remediate harms resulting from alleged unlawful conduct of Goldman Sachs". (see Appeal submitted to NJ Superior Account Appellate Division, download at [www.FinFix.org/Appeal-NJ.pdf](http://www.FinFix.org/Appeal-NJ.pdf)) . ***If I had not fought so hard my home would have been taken between 2009 and 2012.***

## PLANTIFF REPEATEDLY EVADES TRIAL AS DEFENDANT SUFFERS

Instead of resolving their "errors" when I pointed them out in 2006, the defendants exacerbated their fraud, bringing in more parties and engaging many law firms to support and protect them from their continued and perpetual fraudulent actions. Now, ten years later, their effort to protect themselves continues as my damages from their fraud continue to grow.

The defendants' actions have indeed taken a tremendous toll on my health and finances. I am surely not the only person damaged by these firms.

**STATE OF NEW JERSEY SHOULD INVESTIGATE**

The State of New Jersey should review all mortgages in which these defendants participated in any way including as a servicer, underwriter, backer, investment manager or other capacity. The volume and magnitude of the participation could possibly have contributed to NJ ranking No. 2 in foreclosures nationwide.

I look forward to your response.

Sincerely,

Veronica Williams  
Plaintiff & Owner of 541 Scotland Road since 1983

cc: David M. Lambropoulos, Stern & Eisenberg, PC via US certified mail & email  
Superior Court of New Jersey, Essex County Veterans Courthouse, Room 131 via US Mail  
Judge Stephanie Ann Mitterhorf via facsimile to  
Stuart Seiden, Duane Morris LLP via email to  
Brett L. Messinger, Partner, Duane Morris via email to  
Office of the Attorney General of the United States, Investigation No. 3017165  
Federal Mortgage Working Group

**ATTACHMENT I**  
**Defendant's Increase Principal Balance \$208,000**  
**FROM DISCOVERY DOCUMENT**  
**EXHIBIT B – 49**

DATE	MORTGAGE PROVIDERS & SERVICERS	OUT OF BUSINESS	PROVIDER/ SERVICER	PRIMARY HELOC	BEGINNING PRINCIPAL BALANCE PER DEFENDANTS	CORRECT PRINCIPAL BALANCE	AMOUNT ADDED TO PRINCIPAL
8/25/1983	City Federal Savings & Loan	YES	P	P	\$75,536	\$75,536	\$0
	Main Street Mortgage	YES	S	P			\$0
	Chase Mortgage (HELOC)	DISMISSED	P	H			\$0
5/6/2002	Aames Home Loan	YES	P	P	\$69,980	\$69,980	\$0
	PCFS Mortgage	YES	S	P			\$0
2006	Litton Home Loan	YES	S	P	\$180,000	\$67,675	\$112,325
3/27/2006	Fremont Home Loan	YES	P	P	\$261,000	\$53,000	\$95,675
2009	Litton Home Loan	YES	S	P	NA	\$53,000	NA
2011	Ocwen	NO	S	P	NA	NA	NA
						TOTAL	\$208,000
	Litton Principal Payments, estimated					\$15,000	
	<b>As of Feb. 15, 2010</b>					<b>\$38,000</b>	
<b>All mortgages issued from te Fremont Home Loan Trust and serviced by Fremont Home Loan should be cancelled immediately. Consumers cannot trust the validity or accuracy of the figures for Fremont mortgages in MERS or any other files and systems.</b>							
	Fremont Home Loan trust 2006-C Mortgage-Backed Certificates Series 2006-C						

<http://finfix.org/proof/DD/Mortgage-History-wFinancials.xlsx>

All mortgages issued from the Fremont Home Loan Trust and serviced by Fremont Home Loan should be cancelled immediately. Consumers cannot trust the validity or accuracy of the figures for Fremont mortgages in MERS or any other files and systems.

From Discovery:


- o Litton Loan added about \$112,325 & Fremont added about \$95,675 to my principal (Ex3:[PROOF](#))




## ATTACHMENT II cont'd.

### PRESS RELEASE

### FDIC CEASE AND DESIST ORDER TO FREMONT INVESTMENT & LOAN

**Federal Deposit Insurance Corporation**  
Each depositor insured to at least \$250,000 per insured bank

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Home > [News & Events](#) > Press Releases

#### Press Releases

#### FDIC Issues Cease and Desist Order Against Fremont Investment & Loan, Brea, California, and its Parents

FOR IMMEDIATE RELEASE  
March 7, 2007

Media Contact:  
David Barr (202) 898-6992  
Cell: 703-622-4790  
[dbarr@fdic.gov](mailto:dbarr@fdic.gov)

The Federal Deposit Insurance Corporation (FDIC) today announced it had issued a cease and desist order against Fremont Investment & Loan, Brea, California ("Bank"), and its parent corporations, Fremont General Corporation and Fremont General Credit Corporation. The bank and its parents, without admitting or denying the allegations, consented to the order.

In taking this action, the FDIC found that the bank was operating without effective risk management policies and procedures in place in relation to its subprime mortgage and commercial real estate lending operations. The FDIC determined, among other things, that the bank had been operating without adequate subprime mortgage loan underwriting criteria, and that it was marketing and extending subprime mortgage loans in a way that substantially increased the likelihood of borrower default or other loss to the bank.

The order sets forth a variety of corrective actions to be undertaken. The order requires that the bank adopt a five-year strategic plan for its business. The order also requires that the bank, within 90 days, adopt a subprime mortgage lending policy with provisions designed to correct its lending practices, including that it underwrite future subprime loans with an analysis of the borrower's ability to repay at the fully indexed rate and provide borrowers with clear information about the benefits and risks of the products.

The order also requires the bank within 90 days to describe efforts it will make to restructure loans in distress consistent with the marketability of such loans and with sound principles of underwriting. In addition, the order requires the bank to fully comply with all consumer protection laws. The order also requires the bank to correct its commercial real estate lending practices.

"Our concern has always been that banks make loans that borrowers are able to repay," said FDIC Chairman Sheila C. Bair. "We believe that the agreement with Fremont addresses this basic concern."

Attachment: <http://www.fdic.gov/bank/individual/enforcement/2007-03-00.pdf> - PDF 53k ([PDF Help](#))

<https://www.fdic.gov/news/news/press/2007/pr07022.html>

#### ORDER TO CEASE AND DESIST Docket No. FDIC-07-035b

Dated at San Francisco, California, this 7th day of March, 2007.

John F. Carter

Regional Director Division of Supervision and Consumer Protection

San Francisco Region

Federal Deposit Insurance Corporation

<https://www.fdic.gov/bank/individual/enforcement/2007-03-00.pdf>

## ATTACHMENT III cont'd.

Ex29: [PROOF](#) Page 1 of 15 total pages

*Veronica Ann Williams*  
Mailing Address P.O. Box 978 ✦ South Orange, NJ 07079-0978  
Residence – NO MAIL: 541 Scotland Road ✦ South Orange, NJ 07079-3009

---

June 10, 2010

Mr. Brendan McDonagh  
CEO  
HSBC North America Holdings Inc.  
28525 N. Riverwoods Blvd.  
Mettawa, IL 60045

Dear Mr. McDonagh,

I would like your assistance to ensure that I receive a mortgage modification that is in the mutual best interests of HSBC, my community and I. Given the manner in which my previous efforts have been handled by Litton Loan (see Attachment I), I believe we can resolve this matter in a mutually beneficial and fair way with your intervention.

### **FORECLOSURE BAD BUSINESS DECISION FOR HSBC**

HSBC earns a greater return with modification than foreclosure; the proposed modification gains \$35,864 vs. the foreclosure which loses \$50,413 (see Attachment IV). Foreclosure puts HSBC at a financial and strategic disadvantage (see Attachment I). I qualify for HAMP (see Attachment II) but Litton Loan recently told Tri-City they don't participate in HAMP. In December 2008, Litton Loan told me they would provide me with a HAMP modification.

My foreclosure, as many others, is not in the spirit of US Banking Laws. The manner in which my account has been handled by Litton Loan is not consistent with HSBC's history & reputation.

### **HSBC CHARTERED TO SUSTAIN NOT DESTROY COMMUNITIES**

My neighborhood, like so many others in the U.S., is beginning to decline due to empty foreclosed homes and other casualties of the economy. The Federal Reserve<sup>1</sup> seeks to sustain U.S. communities when banking and mortgage charters are issued to institutions like HSBC. Indeed, HSBC is still fairly new in the US banking market<sup>2</sup>. I ask that you review your obligation to shareholders, mortgage holders and US citizens as you reconsider options to assist me.

I thank you for joining in the spirit of the Federal effort to generate our Nation's economic recovery.

Sincerely yours,



cc with attachments, without enclosures:

Toni L. Caldwell, Executive Director/Chief Executive Officer, Tri-City Peoples Corporation  
Edward R. Kim III, Partner, Powers Kim LLC  
Hon. Harriet Farber Klein, J.S.C.  
Larry Litton, Jr., President, Litton Loan Servicing LP  
Brendan McDonagh, CEO, HSBC North America  
Ashley Besk, Assistant Vice President, Prime Modification Dept., Chase  
David H. Stevens, Assistant Secretary for Housing – Federal Housing Commissioner, HUD

<sup>1</sup> Through Community Reinvestment Act – Title 12. PART 203—HOME MORTGAGE DISCLOSURE (REGULATION C)

<sup>2</sup> "HSBC USA Receives Approval for National Charter" [by Comptroller of the Currency], BusinessWire June 24, 2004.

**ATTACHMENT III cont'd.**

Ex30: [PROOF](#) Page 3 of 3 total pages



June 25, 2010

Veronica Williams  
PO Box 978  
South Orange, NJ 07079

Re: Litton Loan Servicing LP Loan No. 40212367  
Property address: 541 Scotland Road South Orange, NJ 07079

Dear Ms. Williams:

This letter is in response to your correspondence dated June 16, 2010 regarding the above referenced account.

Please be aware that HSBC Bank U.S.A. acts as a trustee for certain loan securitization trusts in connection with the issuance of mortgage backed securities. As trustee, the bank has only a nominal role with the respect to the properties owned by the trust. Under the agreements that establish the trusts, other companies are designated as the servicers of the loans and those servicers handle matters such as mortgage foreclosures, loan modifications, evictions and sales of foreclosed trust properties. This matter has been forwarded to Litton Loan Servicing for handling who is the servicer of the trust that owns this property.

Should you require any additional information, please feel free to contact me directly at (813) 571-6505.

Sincerely,

A handwritten signature in black ink, appearing to read "Erin Martin".

Erin Martin  
Customer Resolution Department

**ATTACHMENT IV**  
**Plaintiff's Attorney Defames Defendant**

**FROM MOTION FOR PROOF HEARING**

**EXHIBIT B – 49**

**PLAINTIFF'S RESPONSE TO CHARACTER ASSASSINATION BY DEFENDANT'S ATTORNEY**

February 1, 2014

TO: Denbeaux & Denbeaux Team  
FROM: Veronica Williams  
RE: Stern & Eisenberg's Effort to Destroy My Reputation

I was so angry and insulted after reading the first 2 paragraphs of the correspondence from David Lambropoulos to Judge Harriet Klein dated January 29, 2014 (attached), that I prepared this information as soon as I calmed down (a few days later). Yes, I know this is the *dance* and a common, underhanded legal strategy to undermine me. Let's turn it back on them. Of course, you should decide if and when to use this information.

I have always carried myself and taken great pride in having the upmost integrity. While I can cite numerous examples of being vetted and recognized for my character and integrity, let me highlight just a few:

ORGANIZATION & POSITION	DESCRIPTION	DATE
<a href="#">FINRA</a> Arbitrator	Successfully underwent extensive review, evaluation and investigation to become an arbitrator for the Financial Industry Regulatory Authority.	Since 2009
<a href="#">Women Who Mean Business</a>	Acclaimed panel and their supporting team scrutinized leading business women in the US and Canada. <a href="#">I was one of the 75 selected featured in this book.</a>	1999
Member of Microslate Board of Directors	I was the focus of an extensive and thorough investigation by this renown international manufacturing firm. I was the only foreigner, woman and minority voted in as a member of their Board of Directors. Our Board oversaw a major acquisition and also chaired the compensation committee.	1998 – 2003 est.
COMDEX Board of Advisors COMDEX Media Board	I was selected and <a href="#">provided advisory services to the largest commercial IT event company</a> for more than 5 years. A sitting US President attended the pavilion I created, orchestrated and led. This meant passing a Secret Service review. I also made several media appearances on their behalf.	1994-2002

ORGANIZATION & POSITION	DESCRIPTION	DATE
US Public Trust	I held a US Public Trust (consulted to the National Archives) and passed two investigations by the US Dept. Homeland Security to attend confidential, private briefings. I also was cleared to review strategic information and deliver strategic and custom designed solutions for the US Army with admittance to multiple military bases. <b><i>I was in the final stage to receive a US Security Clearance until Goldman Sachs and Litton Loan defrauded me, an action condoned by HSBC in writing.</i></b>	2008
US Department of Defense (DoD)	Recommended by the DoD – OSD – I served as an early contributor to GIG development process as member of DoD Industry Council supported by NDIA/AFEI, DISA and major Federal contractors. With a reputation of high integrity, my company was the only small firm without a DoD task Order invited to attend.	2003 – 2008 est.
Marquis Who's Who	<a href="#">Recognized since 1988 in over 38 publications.</a> Since Marquis Who's Who® is the premier publisher of biographical information used by thousands of public, academic and corporate libraries around the world. <a href="#">Marquis' Who's Who in America®</a> has remained the definitive biographical reference work since 1899, chronicling the lives and accomplishments of men and women in every field of endeavor. Marquis Who's Who LLC is a wholly owned subsidiary of News Communications, Inc, which also owns The Hill and National Register Publishing. For more information, please visit <a href="http://www.marquiswhoswho.com">www.marquiswhoswho.com</a>	1994 to current
<a href="#">PMI</a> PgMP credential holder	Successfully completed extensive and thorough evaluation and review to earn the <a href="#">PgMP credential</a> , held by less than 1,000 worldwide. <a href="#">Continues to comply with expertise and ethics standards to maintain credential.</a>	2009
Rotary International	I served as a two-term President of the Orange Rotary. Rotary International brings together a global network of volunteer leaders dedicated to tackling the world's most pressing humanitarian challenges. Rotary connects 1.2 million members of more than 34,000 Rotary clubs in over 200 countries and geographical areas. Their work improves lives at both the local and international levels, from helping families in need in their own communities to working toward a polio-free world. For more information, visit <a href="http://Rotary.org">Rotary.org</a> .	2004-06
Recommendations and Commendations	I have received countless recommendations over the years for my contributions and accomplishments. Many can be found online at <a href="http://www.VeronicaWilliams.com">www.VeronicaWilliams.com</a> , <a href="#">LinkedIn</a> and <a href="http://www.the5ps.com/Brand">http://www.the5ps.com/Brand</a> . Many written letters are available and two recent letters from fellow arbitrators are attached.	Lifetime

Additional validation available from extended resume (attached) and at [www.VeronicaWilliams.com](http://www.VeronicaWilliams.com).



**ATTACHMENT IV cont'd.**

**EXHIBIT B – 49 cont'd.**

**Page 1 of 28 Total Pages**

*Rec'd 1/30/14*



Stern & Eisenberg PC

Stern & Eisenberg, PC  
[www.sterneisenberg.com](http://www.sterneisenberg.com)

Steven K. Eisenberg<sup>\*</sup>  
Thomas E. Shea<sup>\*</sup>  
Jacqueline F. McNally<sup>\*</sup>  
David M. Lambropoulos<sup>\*</sup>  
Margaret Cascino<sup>\*</sup>  
M. Troy Freedman<sup>\*</sup>  
Evan Barenbaum<sup>\*</sup>  
Stacey A. Weisblatt<sup>\*</sup>  
Leslie J. Rase<sup>\*</sup>  
Christina C. Viola<sup>\*</sup>  
Oliver Ayon<sup>\*</sup>  
Andrew J. Marley<sup>\*</sup>  
Michael J. Reilly<sup>\*</sup>  
Michael I. Gouda<sup>\*</sup>  
Alexandra Saites<sup>\*</sup>  
Lucas M. Anderson<sup>\*</sup>

Richard F. Stern<sup>++</sup>

<sup>\*</sup> Admitted to practice in PA  
<sup>\*</sup> Admitted to practice in NJ  
<sup>\*</sup> Admitted to practice in NY  
<sup>+</sup> Of Counsel

1040 N. Kings Highway  
Suite 407  
Cherry Hill, New Jersey 08034  
(609) 397-9200  
Facsimile: (856) 667-1456

Pennsylvania  
(215) 572-8111  
Facsimile: (215) 572-5025

New York:  
(732) 582-6344  
Facsimile: (732) 726-8719

Our file #117.7900

January 29, 2014

Via Lawyers Service

Hon. Harriet F. Klein, J.S.C.  
Essex County Superior Court  
Wilentz Justice Complex, 13<sup>th</sup> Floor  
212 Washington Street  
Newark, NJ 07102

RE: HSBC Bank USA, National Association, as Trustee vs. Veronica Williams, et. al.  
Docket F-839-13

Dear Judge Klein:

As the Court is aware, this firm serves as legal counsel to Plaintiff in the above captioned matter. Please accept this letter brief in lieu of a more formal memorandum of law in response to Defendant's opposition to Plaintiff's motion for Summary Judgment.

## ATTACHMENT IV cont'd.

### EXHIBIT B – 49 cont'd.

#### Page 2 of 28 Total Pages

Evidently Defendant believes that she can conjure a legitimate defense to this foreclosure action by burdening both the Court and opposing counsel with an endless legal brief. Defendant's opposition is a transparent attempt to raise arguments which have now become convenient predicated on her inability to honor her loan obligations. It bears noting that Defendant has admitted *all* elements of Plaintiff's *prima facie* case in mortgage foreclosure. (See Defendant's Legal Brief in Support of Opposition, page 2). Despite the voluminous nature of her opposition, Defendant falls well short in converting her strained arguments into genuine issues of material fact which would warrant the denial of Plaintiff's application for Summary Judgment. As will be discussed in detail below, Plaintiff is a holder in due course with actual possession of the original "wet ink" note.

#### **Defendants' Suggestion that Plaintiff Lacks Standing Is Unsupported By the Competent Evidence Provided**

Plaintiff and Defendant agree that, in a foreclosure action, standing is established via possession of the original note *or* an assignment of mortgage which pre-dates the filing of the complaint. Deutsche Bank Trust Co. v. Angeles, 428 N.J. Super. 315 (App. Div. 2012). (See Defendants Legal Brief in Support of Opposition, page 4). In the matter *sub judice*, Plaintiff has both possession of the original note in addition to an assignment of mortgage which predates the complaint.

Plaintiff takes issue with Defendant's representation to the Court that "Plaintiff did not plead possession in their complaint, nor have they produced anything to date that is evidence of their physical possession of the original promissory note." Clearly, paragraph 16 of Plaintiff's complaint avers that Plaintiff is the holder of the note and entitled to commence foreclosure. Further, Plaintiff's interrogatory response # 28 (attached to Defendants opposition as Exhibit

## ATTACHMENT V

### Excerpt from Appeal. p. 26

#### HSBC Settlement Agreement Excerpt (complete agreement enclosed):

- ♦ The intention of the United States and the States in effecting this settlement is to remediate harms allegedly resulting from the alleged unlawful conduct of the Defendants
- ♦ to provide cash payments to borrowers whose homes were finally sold or taken in foreclosure by Defendants between and including January 1, 2008 and December 31, 2012
- ♦ relief to consumers

#### Goldman Sachs Settlement Agreement Excerpt (complete agreement enclosed):

- ♦ the United States believes that there is an evidentiary basis to compromise potential legal claims by the United States against Goldman Sachs for violations of federal laws in connection with the marketing, structuring, arrangement, underwriting, issuance, and sale of RMBS.
- ♦ of consumer relief to remediate harms resulting from alleged unlawful conduct of Goldman Sachs,
- ♦ the activities where the representation, disclosure, or non-disclosure involves information about or obtained during the process of originating, acquiring, securitizing, underwriting, or servicing residential mortgage loans
- ♦ common law theories of negligence, gross negligence, payment by mistake, unjust enrichment, money had and received, breach of fiduciary duty, breach of contract, misrepresentation, deceit, fraud, and aiding and abetting any of the foregoing

Copies of the settlement agreements that HSBC and Goldman Sachs executed with the United States Department of Justice are enclosed with this appeal.

**SUMMARY OF EXCERPTS FROM TIMELINE: p. 34**  
**ADDITIONAL SUPPORTING DOCUMENTS p. 35**

This appeal for **Case F-000839-13** can be downloaded at **[www.FinFix.org/Appeal-NJF.pdf](http://www.FinFix.org/Appeal-NJF.pdf)**

All primary documents from **Case L-004753-13** and their hyperlinks are provided below:

No. Pgs	Documents	Download
59	Appeal	<a href="http://www.FinFix.org/Appeal-NJ.pdf">www.FinFix.org/Appeal-NJ.pdf</a>
118	Enclosures	<a href="http://www.FinFix.org/Appeal-Encl-NJ.pdf">www.FinFix.org/Appeal-Encl-NJ.pdf</a>
93	Case Files	<a href="http://www.FinFix.org/CaseFiles-NJ.pdf">www.FinFix.org/CaseFiles-NJ.pdf</a>
750	Discovery	<a href="http://www.fifix.org/proof/DD/Motion-for-Proof-Hearing_SHARED.pdf">http://www.fifix.org/proof/DD/Motion-for-Proof-Hearing_SHARED.pdf</a>
205	Motion for Proof Hearing	<a href="http://finfix.org/proof/DD/Discovery-Documents_ALL_11-18-14.pdf">http://finfix.org/proof/DD/Discovery-Documents_ALL_11-18-14.pdf</a>
PLEASE NOTE THIS IS LESS THAN 2% OF THE DOCUMENTS ASSOCIATED WITH THIS CASE.		



## ATTACHMENT VI

366 KINDERKAMACK ROAD  
WESTWOOD, NEW JERSEY 07675  
201.664.8855  
FAX: 201.666.8589  
www.denbeauxlaw.com  
email: info@denbeauxlaw.com



Marcia W. Denbeaux\*  
Joshua W. Denbeaux\*  
Adam Deutsch\*  
Abigail D. Kahl\*  
Nicholas A. Stratton\*  
Meghan Chrisner-Keefe  
Of Counsel  
Mark P. Denbeaux\*  
\*Admitted in NJ and NY

October 16, 2013

Sent via E-mail and UPS

David M. Lambropoulos  
Stern & Eisenberg, PC  
1040 N. Kings highway  
Suite 407  
Cherry Hill, New Jersey 08034

Re: **Veronica Williams v. Stern & Eisenberg, PC, et al.**  
**Docket No.: L-4753-13**

Dear Mr. Lambropoulos

This office is in receipt of your letter dated September 16, 2013.

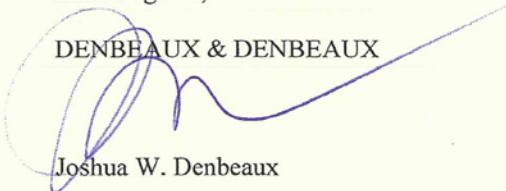
Please be advised that this office will not be dismissing Stern & Eisenberg from the above referenced action. However, after reviewing your letter, Plaintiff agrees that Stern & Eisenberg would not be liable under the following claims: Consumer Fraud Act Violation, Breach of Contract, and Intentional Infliction of Emotional Distress. Accordingly, those claims will be withdrawn as to Stern & Eisenberg only.

Plaintiff will not be withdrawing its claim under the Fair Debt Collections Practices Act. Stern & Eisenberg is a debt collector as defined by the FDCPA and accordingly is liable under that statute for their improper attempts to foreclose on Plaintiff's home.

Please be guided accordingly.

Kind Regards,

DENBEAUX & DENBEAUX



Joshua W. Denbeaux

cc: Veronica Williams

**EXCERPTS FROM TIMELINE**  
(Complete, Updated Timeline Will Be Presented at Trial)

HSBC Bank USA, Natl. Assoc., as Trustee for Fremont Home Loan Trust 2006-C,  
Mortgage-Backed Certificates, Series 2006-C vs. Veronica Williams et. al.  
Superior Court of New Jersey, Chancery Division Docket No. F – 000839-13

WILLIAMS vs. HSBC, GOLDMAN SACHS, OCWEN, et. al.  
Superior Court of New Jersey, Law Division Docket No ESSEX-L-004753-13

U.S. Dept. of Justice Investigation No. 3017165

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## ATTACHMENT VII : FROM APPEAL OF CIVIL CASE

### SUMMARY OF EXCERPTS FROM TIMELINE:

(Complete, Updated Timeline Will Be Presented at Trial)

LONGEVITY NO LONGER EQUATES TO INTEGRITY FOR LONG ESTABLISHED FINANCIAL INSTITUTIONS		
1850 – 1938	<ul style="list-style-type: none"> <li>The <a href="#">Hongkong and Shanghai Banking Corporation</a> (HSBC) was established 3-3-1865 in Hong Kong, China.</li> <li>Goldman Sachs was established in 1869</li> </ul>	
DEFENDANTS CREATE A TANGLED WEB		
1985 - 2011	<ul style="list-style-type: none"> <li>Movement of funds and Avoidance of Legal Actions through SEC Shelf Registrations, Firms established, Creative Mergers &amp; Acquisitions, Reverse Acquisitions, Firms Shut Down and more</li> </ul>	
PLAINTIFF ADVISES FEDERAL GOVERNMENT ON FRAUDULENT ACTIONS BY DEFENDANTS		
2011 – 2015	<ul style="list-style-type: none"> <li>2011 Plaintiff advises Federal Departments and Agencies of Defendants' actions including the Securities and Exchange Commission (<a href="#">SEC</a>), Dept. of the Treasury, Consumer Financial Protection Bureau (<a href="#">CFPB</a>) and the Dept. of Justice (<a href="#">DOJ</a>) and other agencies</li> </ul>	
AS DEFENDANTS DISPOSE OF ASSETS AND NEGOTIATE SETTLEMENTS WITH THE US DEPT OF JUSTICE, THEY INCREASE EFFORTS TO DISMISS PLAINTIFF'S ACTION		
2015 – 4/27/16	<ul style="list-style-type: none"> <li>Ocwen sells mortgage rights March 7, 2015</li> </ul>	<a href="#">Selling \$45B mortgage rights</a> <a href="#">Ocwen sells \$45B mortgage rights</a>
	<ul style="list-style-type: none"> <li>US DOJ opens investigation April 23, 2015</li> </ul>	<a href="http://www.fifix.org/UPDATE_5-29-15.pdf">http://www.fifix.org/UPDATE_5-29-15.pdf</a>
	<ul style="list-style-type: none"> <li>Ocwen sells mortgage rights April 24, 2015</li> </ul>	<a href="#">Selling \$89B mortgage rights</a> <a href="#">Why Ocwen Unloads \$89B Portfolio</a>
	<ul style="list-style-type: none"> <li>HSBC reaches settlement with DOJ Feb. 5, 2016 HSBC settled Friday, February 5, 2016 <a href="#">Agreement</a> 66 pages</li> </ul>	<a href="https://www.justice.gov/opa/pr/justice-department-reaches-470-million-joint-state-federal-settlement-hsbc-address-mortgage">https://www.justice.gov/opa/pr/justice-department-reaches-470-million-joint-state-federal-settlement-hsbc-address-mortgage</a>
	<ul style="list-style-type: none"> <li>Goldman Sachs reaches settlement with DOJ April 11, 2016 Goldman Sachs settled for \$5.1B Monday, April 11, 2016 <a href="#">Agreement</a> 18 pages</li> </ul>	<a href="https://www.justice.gov/opa/pr/goldman-sachs-agrees-pay-more-5-billion-connection-its-sale-residential-mortgage-backed">https://www.justice.gov/opa/pr/goldman-sachs-agrees-pay-more-5-billion-connection-its-sale-residential-mortgage-backed</a>
	<ul style="list-style-type: none"> <li>Plaintiff files Appeal with Appellate Division of NJ Superior Court on March 10, 2016</li> </ul>	
	<ul style="list-style-type: none"> <li>Plaintiff files amendment to Appeal with Appellate Division of NJ Superior Court on April 27, 2016</li> </ul>	

SOURCES INCLUDE: [www.Justice.gov](http://www.Justice.gov), Discovery document, Proof Hearing document, DOJ submission, Email update to DOJ about Ocwen's recent activities: a US DOJ ID Number 3017165 – UPDATE

[http://www.fifix.org/proof/VWDS/COURT\\_US-AG\\_HELP\\_UPD\\_EMAIL\\_8-31-15.docx](http://www.fifix.org/proof/VWDS/COURT_US-AG_HELP_UPD_EMAIL_8-31-15.docx)

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