

Veronica Williams, Esquire
PO Box 978
South Orange, NJ 07079

| | | |
|----------------------------------|---|------------------------------|
| Veronica Williams, Pro Se | : | SUPERIOR COURT OF NEW JERSEY |
| | : | ESSEX COUNTY |
| Plaintiff(s) | : | LAW DIVISION |
| | : | |
| Vs. | : | DOCKET NO.: L-00081-11 |
| | : | |
| Goldman Sachs Co., & Litton Loan | : | |
| Serving, LP | : | |
| Defendant(s) | : | |

DOCUMENTS SERVED: CIVIL ACTION SUMMONS AND COMPLAINT

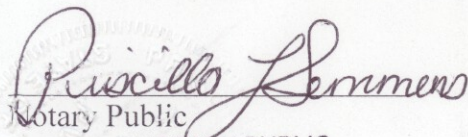
Received by Assurance Process Service on August 4, 2011 to be served on **Litton Loan Servicing, LP c/o CSC at 830 Bear Tavern Road, West Trenton, NJ 08628**. I, Douglas Bramble, being duly sworn, deposes and say that on the **5th of August 2011 at 11:00 a.m.** executed service by delivering a true copy of the documents in accordance with statutes in the manner marked below:

CORPORATION SERVICE: Doreen Haeselin, Authorized Agent

Description: White Female, 5'4", 150 lbs, Gray Hair, 55-60 years old, Glasses.

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and sworn before to me on
Aug 6, 2011 by the affiant
Who is personally known to me


Notary Public
NOTARY PUBLIC
STATE OF NEW JERSEY
PRISCILLA L. SEMMENS
MY COMMISSION EXPIRES JAN. 2, 2012

PROCESS SERVER



DOUGLAS BRAMBLE
Assurance Process Service
305 Colin Lane
Williamstown, NJ 08094

Veronica Williams, Esquire
PO Box 978
South Orange, NJ 07079

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| Goldman Sachs Co., & Litton Loan | : | |
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| Defendant(s) | : | |

DOCUMENTS SERVED: CIVIL ACTION SUMMONS AND COMPLAINT

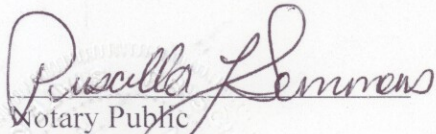
Received by Assurance Process Service on August 4, 2011 to be served on **Goldman Sachs, Co., c/o CT Corp at 820 Bear Tavern Road, West Trenton, NJ 08628**. I, Douglas Bramble, being duly sworn, deposes and say that on the **5th of August at 10:49 a.m.** executed service by delivering a true copy of the documents in accordance with statutes in the manner marked below:

CORPORATION SERVICE: Mary Jane Schultheis, Authorized Agent

Description: White Female, 5'5", 130 lbs, Brown Hair, 55-60 years old, Glasses.


I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made.

Subscribed and sworn before to me on
Aug 6, 2011 by the affiant
Who is personally known to me


Notary Public

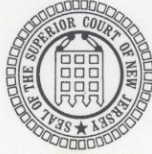
NOTARY PUBLIC
STATE OF NEW JERSEY
PRISCILLA L. SEMMENS
MY COMMISSION EXPIRES JAN. 2, 2012

PROCESS SERVER


DOUGLAS BRAMBLE
Assurance Process Service
305 Colin Lane
Williamstown, NJ 08094

SUPERIOR COURT OF NEW JERSEY

CIVIL DIVISION
ESSEX VICINAGE



Chambers of
James S. Rothschild, Jr., J.S.C.

Historic Courthouse
470 Dr. MLK Jr. Blvd
Newark, New Jersey 07102

September 14, 2011

Veronica Williams
541 New Scotland Road
South Orange, NJ 07079

CC:
Bradley Mitchell
Stevens & Lee
100 Lenox Drive, Suite 200
Lawrenceville, NJ 08648

**Re: Williams v. Litton Loan
Docket No. L-81-11**

Dear Ms. Williams:

I have received your request to adjourn oral argument on your motion to reinstate for trial and motion to amend complaint until February 2012. Because this is a significant delay, the court cannot adjourn the motions at this time. Please withdraw your motions and re-file the motions when you have recovered and able to prosecute the case.

Very truly yours,

A handwritten signature in black ink that reads "James S. Rothschild, Jr." in a cursive style.

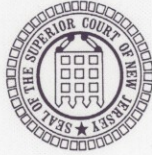
JAMES S. ROTHSCHILD, JR., JSC

JSR:ll

SUPERIOR COURT OF NEW JERSEY

CIVIL DIVISION
ESSEX VICINAGE

Chambers of
James S. Rothschild, Jr., J.S.C.



Historic Court House
470 Dr. MLK Jr. Blvd
Newark, New Jersey 07102

August 31, 2011

Veronica Williams
541 Scotland Road
South Orange, NJ 07079-3009

Bradley Mitchell
Stevens & Lee
100 Lenox Drive, Suite 200
Lawrenceville, NJ 08648

Re: Williams v. Litton Loan Servicing
Docket No. L-000081-11

Dear Parties:

Please be advised that oral argument for the above matter has been scheduled to **September 16, 2011 at 10:30 a.m.** at Courtroom 400 in the Historic Courthouse (470 Dr. MLK Jr. Blvd, Newark, NJ 07102). Your attendance is required—failure to appear may result in a default judgment or dismissal.

Very Truly Yours,

A handwritten signature in black ink that reads "James S. Rothschild, Jr." with a stylized flourish at the end.

James S. Rothschild, Jr., J.S.C.

STEVENS & LEE

100 Lenox Drive, Suite 200
Lawrenceville, NJ 08648
(609) 243-9111 Fax (609) 243-9333
www.stevenslee.com

Direct Dial: (609) 987-6680
Direct Fax: (610) 371-7928
Email: blm@stevenslee.com

August 24, 2011

VIA FEDERAL EXPRESS

Law Division Clerk
Essex County Superior Court
County Courts Building
50 W. Market Street
Newark, NJ 07102

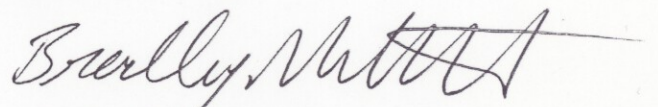
Re: *Veronica Williams v. Litton Loan Servicing, LP and Goldman Sachs & Co.*
Docket No. L-000081-11

Dear Sir or Madam:

Enclosed for filing please find an original and one copy of a Notice of Appearance, which is being filed on behalf of Defendant Litton Loan Servicing LP. We ask that you please file the original and return the copy in the enclosed, self-addressed stamped envelope. Please charge our account number 141242 for any filing fee.

Very truly yours,

STEVENS & LEE



Bradley L. Mitchell

BLM:mjb
Enclosures
cc: Veronica Williams (w/enc.)

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Williamsport • Wilkes-Barre • Princeton • Cherry Hill • New York • Wilmington

Richard J. Pinto, Managing Shareholder Harry A. Horwitz, Managing Shareholder
A PA PROFESSIONAL CORPORATION

Bradley L. Mitchell, Esq.
STEVENS & LEE
A PA Professional Corporation
Princeton Pike Corporate Center
100 Lenox Drive, Suite 200
Lawrenceville, New Jersey 08648
(609) 243-9111
BLM@stevenslee.com
Attorneys for Defendants Litton Loan Servicing, L.P.

VERONICA WILLIAMS,
Plaintiff,

v.

LITTON LOAN SERVICING L.P. and
GOLDMAN SACHS & CO.,

Defendants.

: SUPERIOR COURT OF NEW JERSEY
: ESSEX COUNTY – LAW DIVISION
:
: Docket No.: L-81-11
:
: CIVIL ACTION
:
: **NOTICE OF APPEARANCE**
:

PLEASE TAKE NOTICE that the law firm of Stevens & Lee, P.C. hereby appears as counsel for Defendant Litton Loan Servicing in the above-captioned action.

Respectfully submitted,

STEVENS & LEE
Attorneys for Defendants Litton Loan Servicing

Dated: Lawrenceville, NJ
August 24, 2011

By: 
Bradley L. Mitchell, Esq.

STEVENS & LEE

100 Lenox Drive, Suite 200
Lawrenceville, NJ 08648
(609) 243-9111 Fax (609) 243-9333
www.stevenslee.com

Direct Dial: (609) 987-6680
Direct Fax: (610) 371-7928
Email: blm@stevenslee.com

August 24, 2011

VIA FEDERAL EXPRESS

James S. Rothschild, Jr., J.S.C.
Essex County Superior Court
County Courts Building
50 W. Market Street
Newark, New Jersey 07102

Re: *Veronica Williams v. Litton Loan Servicing, LP and Goldman Sachs & Co.*
Docket No. L-000081-11

Dear Judge Rothschild:

We write as counsel for Defendant Litton Loan Servicing LP ("Litton"), and ask that Your Honor accept this letter brief in lieu of a more formal brief in response to Plaintiff's pending Motion to Reinstate for Trial (the "Motion"), which is returnable on September 2, 2011.

On July 22, 2011, this case was dismissed, without prejudice, by the Court pursuant to Rule 1:13-7 for lack of prosecution. Specifically, Plaintiff failed to file with the Court a proof of service of the summons and complaint upon Litton, or an acknowledgment of service by Litton, within the time prescribed by the Rule, which resulted in the suit being dismissed.

In support of the Motion, Plaintiff states that "On or about December 23, 2010, a summons was mailed to the defendants. The case defaulted on or about January 23, 2011." See Motion to Reinstate for Trial, paragraph 1. While it appears that Plaintiff did mail a summons to Litton in December, 2010, Plaintiff's statement that the "case defaulted on or about January 23, 2011" is in error. Rule 4:4-4 clearly identifies the methods by which service upon a corporate defendant can be made. Mail service alone that is not subsequently accompanied by an appearance from the defendant or an acknowledgement of service is not proper service under the rules. Litton was thus never properly served with the Summons and Complaint in this case prior to the time it was dismissed by the Court pursuant to Rule 1:13-7. Therefore, as it was never properly served, it is plain that Litton did not default prior to the dismissal on July 22.

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Williamsport • Wilkes-Barre • Princeton • Cherry Hill • New York • Wilmington

Richard J. Pinto, Managing Shareholder Harry A. Horwitz, Managing Shareholder
A PA PROFESSIONAL CORPORATION

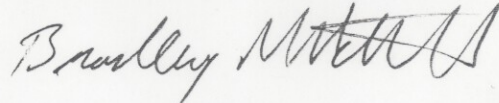
STEVENS & LEE
A PA Professional Corporation

James S. Rothschild, Jr., J.S.C.
August 24, 2011
Page 2

Accordingly, in the event the Court grants the Motion and reinstates this case to the active calendar, Litton respectfully requests that: (1) Plaintiff be required to properly serve Litton after restoration in accordance with the Court Rules, and (2) that the case be treated according to the Rules for scheduling purposes from the date that Plaintiff is able to establish proper service of the Summons and Complaint upon Litton.

Respectfully submitted,

STEVENS & LEE



Bradley L. Mitchell

BLM/blm
Enclosures
cc (w/enc.):
Veronica Williams, *pro se*
Law Division Clerk