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

VERONICA A. WILLIAMS,

Plaintiff, Pro Se

v.

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

Defendants

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

**UPDATE TO PLAINTIFF'S RESPONSE TO  
MOTIONS TO DISMISS**

**FOR PROBLEMS WITH:**

NJ Case Docket No. F – 000839-13

NJ Case Docket No. ESSX L – 004753-

NJ Case Docket No. ESSX L – 000081-13

U.S. DISTRICT COURT  
DISTRICT OF NEW JERSEY  
RECEIVED  
FEB 13 2018

**UPDATE TO PLAINTIFF'S RESPONSE TO MOTIONS TO DISMISS**

**Defendants' Feb. 6, 2018 and Plaintiff's New Count Warrant Update**

I, the Plaintiff, was prepared to deliver statements at the February 9, 2018 hearing (Agenda on p. 8). My U.S. District Court of New Jersey (USDCNJ) filings Docs #33, #34 and #77 are revised based on the Feb. 6, 2018 filing from the defendants and my Motion USDCNJ Doc# 78. In accordance with Judge Dickson's direction, my presentation is outlined below.

**FINANCIAL AND LEGAL FRAUD BY DEFENDANTS AND THEIR ALLIES IS UNCONSCIONABLE**

13 years is cruel and more than long enough! The 4 years of financial fraud committed by the defendants was quite diabolical. The ensuing 9 years of legal fraud committed by attorneys and certain employees of the State of New Jersey is utterly heinous. My case begs to be heard in open court to shed light on the tactics that have been imposed on me and certainly so many other homeowners. Highlights of my case are enclosed (Case Highlights).

Once I realized that even the NJ Supreme Court was shamelessly denying me due process, I drafted a writ for the US Supreme Court. While conducting research to support my writ, I learned that my matter met the criteria to be heard by the US District Court of New Jersey. Just a few of these reasons rebut the defendants' recent defenses and assertions why my case should be dismissed and moved to the US Supreme Court.

## JUSTIFICATION FOR USDCNJ JURISDICTION

The justifications for this case being heard in the U.S. District Court of New Jersey are many, but this document focuses on:

- Rooker-Feldman Doctrine and Time Barred Are Not Justified
- Plaintiff Has Been Denied Due Process
- Need Federal Dominion – Defendants Locations in CA, TX, GA, FL, NY & India
- Federal Torts Statutes Protect Against Defendants' Bad Actions
- Further Delays & Wash., DC Location Pose Undue Burden to Plaintiff

### ROOKER-FELDMAN DOCTRINE & TIME BARRED ARE NOT JUSTIFIED

The defendants contend that my case must be moved to the U.S. Supreme Court due to the Rooker-Feldman Doctrine and they believe it is time barred. Neither the Rooker-Feldman Doctrine nor the Fair Debt Collection Practices Act's (FDCPA) one-year statute of limitations applies to this case.

According to the Rooker-Feldman doctrine, "a U.S. district court has no authority to review final judgments of a state court in judicial proceedings"<sup>1</sup> The State of New Jersey never gave the Plaintiff the opportunity to present her case. The case was decided without the Plaintiff's knowledge, presence or input. The State of New Jersey did not wrongly consider the issues before it; *the State never considered the issues because it blocked hearing the issues.*

The Rooker-Feldman Doctrine and one-year statute of limitations are not valid in my case. The fraudulent mortgage obviates the defendants' right to collect on this alleged debt. The scope of this case is far more expansive than the violation of the FDCPA. Other issues are discussed herein and in Court filings.

In the foreclosure case, the State of New Jersey and the defendants' attorney withheld the fraudulent mortgage document and shielded the Plaintiff from attending hearings by failing to notify her. This prevented the Plaintiff from presenting her case, including proof she had that the mortgage was fraudulent.

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<sup>1</sup> *The Rooker-Feldman Doctrine and the Automatic Stay*, Feb. 2002, American Bankruptcy Institute, <https://www.abi.org/abi-journal/the-rooker-feldman-doctrine-and-the-automatic-stay>

Multiple Judges made decisions without the Plaintiff's knowledge or input. The case filings include a letter that the Plaintiff sent to Judges who made questionable decisions. Judge Mitterhoff denied me, the Plaintiff, access to a hearing but required my *former* attorney to represent me. This attorney was the Senior Partner to the attorney who co-signed the fraudulent Court document with the defendants' attorney. My case would have been closed if I, the Plaintiff, believed that document and had not shown up at the hearing that *had not been rescheduled* (as indicated in the document).

The clerks assigned to my (the Plaintiff) case in the NJ Appeals Court and NJ Supreme Court gave me instructions that, in my opinion, had no valor and would further prevent me from presenting the deceptive actions of the lawyers, judges, State staff and defendants. I, the Plaintiff, was denied due process at virtually every step in the New Jersey legal process.

Since the NJ Governor's Office failed to find the certified mail addressed to the Appeals Court that had been "lost" by the Post Office run by the State of New Jersey, and after multiple failed requests, I (the Plaintiff) had no reason to believe that the NJ Courts would change their pattern and offer me fair hearings and my constitutional right to due process. Details about these facts are presented in the USDCNJ case filings.

There were numerous legal inhibitors to the Plaintiff receiving due process in New Jersey. Yet, I, the Plaintiff, was directed to the NJ Courts. My, the Plaintiff, former attorney convinced me that he should file in State Court rather than in the USDCNJ. That turned out to be bad advice *for me*. The New Jersey legal inhibitors ranged from "losing" U.S. Certified mail, failing to return postal money orders, ignoring court rules to notify the Plaintiff and more.

These and other actions prevented me, the Plaintiff, from presenting evidence that would have proved the guilt of the defendants.

The Rooker-Feldman Doctrine, as aforementioned, states that district courts have no authority to review final judgments of the state. The USDCNJ is not reviewing final judgements of the New Jersey Courts. Rather, it is giving the Plaintiff her constitutional right to due process that was denied by the NJ Courts. A trial at the USDCNJ can allow the Plaintiff to present evidence, as well as

subpoena critical evidence and witnesses. The Rooker-Feldman Doctrine has been denied in other district court cases (a few are cited below) and it should be denied in this case.

**CASES CITED (highlighted case summaries or documents are available from Plaintiff):**

MD Fla Rooker-Feldman Does Not Bar Federal Court Jurisdiction over FDCPA Claim, Guda v. McClure & Grigsby, PA, <http://wilbertbankrutpcyupdates.blogspot.com/2017/05/md-fla-rooker-feldman-does-not-bar.html>

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION No. 4:13CV2524; BRADLEY LAVEAR, Plaintiff, v. HEA DENNIS J. BARTON, III, Defendant, [https://www.gpo.gov/fdsys/pkg/USCOURTS-moed-4\\_13-cv-02524/pdf/USCOURTS-moed-4\\_13-cv-02524-0.pdf](https://www.gpo.gov/fdsys/pkg/USCOURTS-moed-4_13-cv-02524/pdf/USCOURTS-moed-4_13-cv-02524-0.pdf)

United States Court of Appeals For the Eighth Circuit No. 14-3665, Appeal from United States District Court for the Eastern District of Missouri - St. Louis; Greg Hageman, Plaintiff - Appellant v. Dennis J. Barton, III, Defendant - Appellee <https://cases.justia.com/federal/appellate-courts/ca8/14-3665/14-3665-2016-03-29.pdf?ts=1459265467>

**PLAINTIFF HAS BEEN DENIED DUE PROCESS**

Most NJ hearings were held without my (the Plaintiff) knowledge, attendance or input. I showed up at the two scheduled hearings for which I received notification; the defendants did not show up at either hearing. In September 2011, I attended the hearing just days before a scheduled major surgery. Despite intense pain, I made it there. The Judge and attorneys allowed me to proceed first. To the chagrin of me and the Judge, the defendants did not show up. Since I was facing an extensive recovery, I withdrew the case and planned to refile as soon as I was healthy enough to continue. Based on Court protocol, the case would likely have been assigned to the Judge who had reviewed my complaint. Unfortunately, my health deteriorated and I was forced to retain an attorney to proceed.

When the attorney withdrew, I showed up at a scheduled hearing that the attorneys attempted to make me believe had been rescheduled. Again, the defendants did not show up.

Just by instinct and chance, I found out about another hearing about 2 days before it was scheduled. When I arrived I learned that most defendants and counts from my complaint had been removed. I was only allowed to present my case against one defendant for a single count. The Judge (Mitterhorf) ruled in my favor, the defendants' attorney promised to send me a modified mortgage that was within my welfare budget, a small monthly payment. It was a Friday afternoon. He made a call from the Courtroom. When he could not get immediate commitment, he told me I would have the specified modification by Monday. When I did not receive the specified modification, and he failed to contact me as promised, I began preparing my appeal.



These and other examples of me (the Plaintiff) being denied due process are included in documents filed with the US District Court of New Jersey. Filings from NJ Cases: NJ Case Docket No. F – 000839-13, NJ Case Docket No. F – 000839-13 and NJ Case Docket No. ESSX L – 000081-11, with names of presiding Judges are included in the documents filed with the US District Court of NJ.

### **NEED FEDERAL DOMINION – DEFENDANTS LOCATIONS IN CA, TX, GA, FL, NY & INDIA**

The defendants have repeatedly failed to cooperate with this legal effort when it was in the New Jersey Court system and even failed to cooperate in preparation for the US District Court hearing held on February 9, 2018. I, the Plaintiff, expect their attorney will follow Judge Dickson's instructions to provide me, the Plaintiff, with documents requested. I am also hopeful that we can proceed by following rules and procedures of the U.S. District Court. The Plaintiff has identified witnesses in California, Texas, Georgia, New York and other states. After speaking with a couple of witnesses, I expect a resistance to participate that can best be mitigated by oversight from the USDCNJ. The State of New Jersey Court System never afforded me the opportunity to present my side of the case, much less subpoena witnesses.

The New Jersey State Courts lack the dominion to properly adjudicate defendants with witnesses and evidence in states from California to Florida to New York and India.

### **FEDERAL TORTS STATUES PROTECT AGAINST DEFENDANTS' BAD ACTIONS**

The defendants repeatedly made promises, conducted reviews, provided documents and verbally assured the Plaintiff that the errors in the mortgage had been and would be corrected. Fremont Home Loan was put out of business by the Federal Deposit Insurance Corporation (FDIC). Litton Loan assured the Plaintiff that their new owner, Goldman Sachs, ensured that they now operated with integrity. These and other actions induced the Plaintiff to delay taking further action (USDCNJ Doc # 78). Once the Plaintiff filed her legal complaint, the defendants, their lawyers and the State of New Jersey facilitated further delays. The Plaintiff filed a motion to add the Count: False Inducement to Inaction. The torts laws supporting this are better litigated in the USDCNJ.

**FURTHER DELAYS & WASH., DC LOCATION POSE UNDUE BURDEN TO PLAINTIFF**

Having to move my (the Plaintiff) case to the U.S. Supreme Court imposes an undue burden, especially after 13 years of draining my finances and imposing stress related health challenges. As defined and quantified on page 3 of the Response to Defendants "Initial Disclosures" document, also filed today, the defendants are flexing their muscle beyond their already inhuman attack.

**TIME LINE OF SELECTED EVENTS**

**THE DEFENDANTS' ATTORNEYS HAVE REQUESTED TIMELINES IN THE PAST, SO THIS ABBREVIATED TIMELINE HAS BEEN PREPARED FOR THE ATTORNEYS AND THE COURT. A VIDEO EXPLAINING THE MORTGAGE CREATION PROCESS HAS ALSO BEEN FILED WITH USDCNJ.**

The foreclosure and all-encompassing demands of litigating against the fraud committed by the defendants and their attorneys has almost shut down my (the Plaintiff) greatest asset, ACT Inc. At the age of 62, in today's economy, it would require hundreds of millions of dollars to restore my 32 year old business to its pre-fraud state. That does not include revenue lost since the fraud began in 2005.

I, the Plaintiff, attended Kevin Flanagan's deposition telephonically. Mr. Flanagan was employed by Litton Loan and was hired by Ocwen when they acquired Litton's mortgage portfolio. I heard him corroborate my finding that Litton Loan did not record payments received. Witnesses and records to be subpoenaed will further corroborate this and also confirm that the principal on my mortgage was dramatically increased without cause.

Attorneys from Duane Morris and Stern & Eisenberg have changed course or provided erroneous documents and commitments during this legal action in the NJ Courts. Although the Plaintiff contacted the controlling Partners and CEO of these firms, nothing was corrected and actions continued. The State of New Jersey facilitated their deceptive actions.

Litton Loan started by destroying my credit and stealing unearned revenue by failing to acknowledge my payments and illegally adding to the principal balance of my mortgage. This was followed by what appears to be a joint effort by Litton Loan and Fremont. Together, Fremont and Litton Loan followed by deceptively creating a fraudulent mortgage and falsely assuring me that the true, intended mortgage had been filed. Fremont continued by duplicitously signing and notarizing a fraudulent mortgage without me. I was not present when Attorney Daniel Roy and the notary signed the mortgage. Neither one was present when the Fremont branch manager switched

mortgages, apologized for the error, then confirmed that he spoke with Fremont headquarters to reapprove the mortgage we had agreed upon long before I met with him to sign the mortgage.

The defendants also encouraged and oversaw the late, filing of the fraudulent mortgage. The fraud does not end there. Details are provided in the case filings and will be further corroborated by witnesses and information to be subpoenaed. Over 9 former Fremont employees, 11+ former Fremont employees, 18+ witnesses to legal fraud and others have been identified to deliver testimony or documents that will corroborate fraud against the Plaintiff. The Plaintiff has identified 91 subpoenas to be issued. The fraud is quite expansive and complex, however, the Plaintiff is prepared to consolidate the evidence and simplify the complexities for the jury.

My case needs to be heard in open Court so that the extent of fraudulent behavior and the far reaching expanse of the consequences can be understood by the public. The defendants' actions have persisted 13 years. Their current attorney has been assigned at least since 2013 (5 years). Asking for, and accepting, a 30-day extension is yet another example of depraved indifference.

The defendants' current attorneys have tried multiple times to convince me to replace Goldman Sachs with the Goldman Sachs Mortgage Company as a defendant. I absolutely will not. Goldman Sachs gave validation to Litton Loan. HSBC provided the foundation for fraud and property theft. That is the reason that all of the fraud was encouraged and allowed to happen. That is also why the defendants' attorneys told the Plaintiff that HSBC was paying legal fees for all defendants.

I implore the Court to allow this to move forward to trial in the USDCNJ. Many NJ residents can benefit in a manner that is not possible if the case is forced to move to Washington, DC. Additionally, I, the Plaintiff, have been through enough. It may take 8 to 9 months to reach trial in New Jersey. It may require another decade and exorbitant expenses to move this case to the U.S. Supreme Court.

Respectfully submitted,



Veronica A. Williams

Pro Se Counsel

/s/ Veronica A. Williams

Veronica A. Williams

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Phone (202) 486-4565

February 13, 2018

**PLAINTIFF'S PRESENTATION FOR FEB. 9, 2018**

US DISTRICT COURT OF NEW JERSEY CASE NO. Case 2-16-cv-05301—ES—JAD

*Discovery Plan presented to Seiden & Messinger**Plaintiff's Overview of Case (with highlights of Discovery requirements) SELECT HIGHLIGHTS*

<b>2005</b>	<ul style="list-style-type: none"> <li>• God's Grace 12/30/04 — <i>miraculous, life-saving, record setting surgery</i></li> <li>• Radiation &amp; List 541 &amp; TO DC – Fed GSA &amp; Family</li> <li>• Litton Bought Mortgage – <i>show doc with 2005 mortgage retirement</i></li> </ul>
<b>2006</b>	<ul style="list-style-type: none"> <li>• Refinance away from Litton <u>2+ Fedex delivery confirmations</u></li> <li>• Progressed Towards Fed Task Orders</li> <li>• Surgery – <i>PLUS ON TO 4 (5) surgeries PLUS 4 hospitalizations</i></li> </ul>
<b>2007</b>	<ul style="list-style-type: none"> <li>• Fremont delays by "fixing" error – <i>FDIC cease &amp; desist §</i></li> <li>• Progressed Towards Fed Task Orders</li> <li>• Take Job for Insurance</li> </ul>
<b>2008</b>	<ul style="list-style-type: none"> <li>• Litton promises <i>NOT to foreclose§, to accept checks§&amp;do modification</i></li> <li>• VW Closes Job to Position for Task Order</li> </ul>
<b>2009</b>	<ul style="list-style-type: none"> <li>• Written Fed Job Offer§ for Task Order Pending Security Clearance</li> <li>• VW Accepts Litton Refi</li> <li>• Pays Off Debt §</li> <li>• Litton Reconfirms in Writing § <i>see payment journals</i></li> <li>• Litton Forecloses &amp; <i>Then Cashes Checks §</i></li> </ul>
<b>2010</b>	<ul style="list-style-type: none"> <li>• VW Prepares Legal Claim <i>submits it weeks after foreclosure</i></li> <li>• Loses: <ul style="list-style-type: none"> <li>○ Clearance §</li> <li>○ Job §</li> <li>○ GSA Schedule §</li> <li>○ Financing §</li> </ul> </li> <li>• VW Files Legal Claim 0011-§</li> </ul> <div style="border: 2px solid black; padding: 5px; width: fit-content; margin-left: auto; margin-right: auto;">Health Threat Example: Erica Garner dead @ 27</div>
<b>2011 – NOW</b>	<ul style="list-style-type: none"> <li>• NJ begins denial of due process</li> <li>• 2011: Litton &amp; Goldman Sachs No Show @ Hearing</li> <li>• 2011: VW Surgeries <i>defendants lie to Federal Reserve §</i></li> <li>• 2014: Attorneys Give Fraudulent Legal Doc § Oct 2014</li> <li>• 2014: Defendants No Show @ Hearing § Carey</li> <li>• 2015: NJ "loses" US Certified Mail §</li> <li>• 2016: VW Removes Case to USDCNJ § Aug 2016</li> <li>• 2017: VW finally gets access to fraudulent mortgage <i>LIBOR filing§ &amp; ERRORS &amp; MISTRUTHS §</i></li> <li>• 2017: Another Surgery July 7<sup>th</sup> §</li> <li>• 2018: FINALLY, jury trial <i>926 witnesses → 34 witnesses + 91 subpoenas</i> <ul style="list-style-type: none"> <li>○ 9+ to Fremont fraud ♦ 11+ to Litton fraud ♦ 18+ to legal fraud</li> </ul> </li> </ul> <div style="border: 2px solid black; padding: 5px; width: fit-content; margin-left: auto; margin-right: auto;">GSA Settlement</div>



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

VERONICA A. WILLIAMS,

Plaintiff,

v.

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

Defendants.

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

**CERTIFICATION OF SERVICE**

I, Veronica Williams, certify that on this 12<sup>th</sup> day of February 2018, a true and correct copy of this document will be given to counsel or sent to the parties via the method and as addressed below:

<p><b>Via Email</b> Brett Messinger, Partner <a href="mailto:BLMessinger@duanemorris.com">BLMessinger@duanemorris.com</a>  Stuart I. Seiden, Associate <a href="mailto:siseiden@duanemorris.com">siseiden@duanemorris.com</a>  Attorneys for Litton Loan Servicing, HSBC Bank USA, Goldman Sachs, Ocwen, Fremont Home Loan trust 2006-C Mortgage-Backed Certificates Series 2006-C  Duane Morris LLP 30 South 17th Street Philadelphia, PA 19103-4196 Phone (215) 979-1124 Fax (215) 827-5536</p>	<p><b>Via Email</b> Evan Barenbaum, Esq Attorney for Stern &amp; Eisenberg    Director of Litigation Stern &amp; Eisenberg, PC 1581 Main Street, Suite 200 Warrington, PA 18976 Office 267-620-2130 Fax 215-572-5025 <a href="mailto:ebarenbaum@sterneisenberg.com">ebarenbaum@sterneisenberg.com</a> <a href="mailto:smalone-zeitz@sterneisenberg.com">smalone-zeitz@sterneisenberg.com</a></p>	<p><b>Via U.S. Mail</b> Attorney General for the State of NJ   Mr. Gurbir S. Grewal Attorney General Office of The Attorney General The State of New Jersey Richard J. Hughes Justice Complex (HJC) 25 Market Street 8th Floor, West Wing Trenton, NJ 08625-0080</p>
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Respectfully submitted,

  
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February 13, 2018