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[http://finfix.org/USAppealsCt/Case\\_19-1032\\_NJ-Unfair\\_6-6-19.pdf](http://finfix.org/USAppealsCt/Case_19-1032_NJ-Unfair_6-6-19.pdf)

**UNITED STATES COURT OF APPEALS  
THIRD DISTRICT**

VERONICA A. WILLIAMS,

Appellant, Pro Se

v.

LITTON MORTGAGE SERVICING LP  
(PARENT OF LITTON LOAN SERVICING  
LP); HSBC BANK USA, N.A.; GOLDMAN  
SACHS GROUP; FREMONT HOME LOAN  
TRUST 2006-C MORTGAGE- BACKED  
CERTIFICATES, SERIES 2006-C; OCWEN  
FINANCIAL CORPORATION; STERN &  
EISENBERG, PC; THE STATE OF NEW  
JERSEY

Defendants

UNITED STATES COURT OF APPEALS

Civ. No. 19-1032

**NJ COURT PROCESS UNFAIR****REFERRED BY:**

U.S. District Court of NJ Case 2:16-cv-05301-ES-

**FOR PROBLEMS WITH:**

NJ Case Docket No. F – 000839-13

NJ Case Docket No. ESSX L – 004753-13

NJ Case Docket No. ESSX L – 000081-11

**ADDITIONAL INFORMATION SUPPORTS HEARING CASE IN FEDERAL COURT****New Jersey Court Process Unfair**

As I continue to try to defend my case in the New Jersey Courts, I continue to face barriers that are unfair.

I am identifying procedural problems, not accusing individuals at this time. The Judge did not believe my testimony nor my financial rebuttal of the mortgage, and my supporting documents were not allowed due to legal rules. When I was forced to borrow<sup>1</sup> money to meet the deficiency determined by the Court before the end of the month, the staff in Trenton noted “ “ on the record.

The additional documents filed and those being prepared for the Court cost me over a year’s savings. The Defendants’ actions have drained my assets and impaired my earnings ability.

Since I have not been able to find a lawyer who I can afford to represent me, I am forced to continue Per Se. There is more than sufficient evidence – on its face – to warrant a verdict in my favor. Copies of new findings are enclosed. Additional investigations have been initiated that will further corroborate what has been submitted to all Courts. These investigations do not include the

<sup>1</sup> The cost of printing and binding *alone*, cost over 1 year of savings! This cost is less than 2 hours of my earnings *before* the Defendants reign of fraud began.

U.S. Department of Justice investigations<sup>2</sup> that preceded the Defendants' record payment of \$470M (HSBC) and \$5B (Goldman Sachs)<sup>3</sup>.

The volume of evidence and the complexities of my case should not obviate it being heard in open Court. The fraud that is rampant demands that my case be heard.

As an arbitrator, we give Per Se parties far more consideration than is provided by New Jersey, the state where I have lived most of my life.

**THE SCOPE OF THE MY CASE IS BEYOND THE JURISDICTION AND REACH OF THE STATE OF NEW JERSEY.**

With patience, I pray the Court allows me to proceed.

Respectfully submitted,

Veronica A. Williams  
Pro Se Counsel

/s/ Veronica A. Williams

Veronica A. Williams

[StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com)

(202) 486-4565

June 6, 2019

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<sup>2</sup> [DOJ investigation No. 3017165](#) was initiated based on information I provided to the Federal government. See [U.S. District Court of New Jersey Case 2:16-cv-05301 Filing](#) No. 99 pp. 17, 22 & 111

<sup>3</sup> See [U.S. District Court of New Jersey Case 2:16-cv-05301 Filing](#) No. 99 pp. 4, 12, XX & 111

## ATTACHMENT I

These documents are enclosed with this filing.

### ENCLOSURES

SECTION	CONTENTS	No. Pages	Click to View
Enclosure I	USDC 5/13/19 Filing <input type="text"/>	2	<a href="#">VIEW</a>
Enclosure II	USDC 5/13/19 Filing follow-up <input type="text"/>	10	<a href="#">VIEW</a>
Enclosure III	<i>NOT ACCEPTED</i> -Deficiency Motion <input type="text"/>	684	<a href="#">VIEW</a>
Enclosure IV	Proof of Delivery of Motion <input type="text"/>	2	<a href="#">VIEW</a>
Enclosure V	SUBPOENA Submitted <input type="text"/>	8	<a href="#">VIEW</a>
Enclosure VI	Proof of Delivery <input type="text"/>	2	<a href="#">VIEW</a>
<b>THE FOLLOWING DOCUMENTS WILL BE FILED AS SOON AS THE INVESTIGATIVE REPORTS HAVE BEEN RECEIVED</b>			
Enclosure VII	More Evidence to NJ <input type="text"/> <span style="color: red; font-weight: bold;">UPLOAD</span> More Evidence to USCA <input type="text"/> <span style="color: red; font-weight: bold;">UPLOAD</span>	TBD TBD	<a href="#">VIEW</a> <a href="#">VIEW</a>
Enclosure VIII	Forgery Report-underway <input type="text"/> <span style="color: red; font-weight: bold;">UPLOAD</span>	TBD	<a href="#">VIEW</a>
Enclosure IX	Fraud Report - initiated with Local & Federal Law Enforcement	TBD	<a href="#">VIEW</a>
Enclosure X	TBD		
Enclosure XI	TBD		
Enclosure XII	TBD		

**Enclosure I**  
**USDC 5/13/19 Filing**

THIS DOCUMENT MAY BE DOWNLOADED AT

[http://finfix.org/USAppealsCt/Case\\_19-1032\\_Additional-Info-Available\\_5-13-19.pdf](http://finfix.org/USAppealsCt/Case_19-1032_Additional-Info-Available_5-13-19.pdf)

**UNITED STATES COURT OF APPEALS  
THIRD DISTRICT**

VERONICA A. WILLIAMS,

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LITTON MORTGAGE SERVICING LP  
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EISENBERG, PC; THE STATE OF NEW  
JERSEY

Defendants

UNITED STATES COURT OF APPEALS

Civ. No. 19-1032

**ADDITIONAL INFO AVAILABLE**

**(THIS IS NOT A BRIEFING DOCUMENT)**

**REFERRED BY:**

U.S. District Court of NJ Case 2:16-cv-05301-ES-

**FOR PROBLEMS WITH:**

NJ Case Docket No. F – 000839-13

NJ Case Docket No. ESSX L – 004753-13

NJ Case Docket No. ESSX L – 000081-11

**ADDITIONAL INFORMATION SUPPORTS HEARING CASE IN FEDERAL COURT**

**Will Provide Additional Information at Court's Direction**

I have additional evidence that further confirms why my case must be head in Federal Court. I can prepare and send it to the U.S. Court of Appeals or submit it during Discovery. If I do not receive a response I shall present it during Discovery.

I continue my effort to work towards resolution. Currently my only recourse appears to be with approval from the U.S. Court of Appeals to proceed to trial. Discovery will be extremely revealing and clarify case complexities. Interrogatories for all witnesses have been prepared.

With patience, I pray the Court allows me to proceed.

Respectfully submitted,

Veronica A. Williams  
Pro Se Counsel

/s/ Veronica A. Williams

Veronica A. Williams

[StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com)

(202) 486-4565

May 13, 2019

**UNITED STATES COURT OF APPEALS  
THIRD DISTRICT**

<p>VERONICA A. WILLIAMS,</p> <p align="center">Appellant, Pro Se</p> <p align="center">v.</p> <p>LITTON LOAN SERVICING, HSBC BANK USA, N.A.; GOLDMAN SACHS GROUP; FREMONT HOME LOAN TRUST 2006-C MORTGAGE- BACKED CERTIFICATES, SERIES 2006-C; OCWEN FINANCIAL CORPORATION; STERN &amp; EISENBERG, PC; THE STATE OF NEW JERSEY</p> <p align="center">Defendants</p>	<p align="center">UNITED STATES COURT OF APPEALS</p> <p align="center">Civ. No. 19-1032</p> <p align="center"><b>ADDITIONAL INFO AVAILABLE</b></p> <p align="center"><b>(THIS IS NOT A BRIEFING DOCUMENT)</b></p> <p><b>REFERRED BY:</b> U.S. District Court of NJ Case 2:16-cv-05301-ES-</p> <p><b>FOR PROBLEMS WITH:</b> NJ Case Docket No. F – 000839-13 NJ Case Docket No. ESSX L – 004753-13 NJ Case Docket No. ESSX L – 000081-11</p>
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**CERTIFICATION OF SERVICE**

I, Veronica Williams, certify that on this 13<sup>th</sup> day of May 2019, a true and correct copy of this document will be sent to the parties via the method and as addressed below:

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

Veronica A. Williams  
Pro Se Counsel  
/s/ Veronica A. Williams  
[StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com)  
(202) 486-4565

May 13, 2019

**Enclosure II**  
**USDC 5/13/19 Filing follow-up**

THIS DOCUMENT MAY BE DOWNLOADED AT

[http://finfix.org/USAppealsCt/Case\\_19-1032\\_Additional-Info-Available\\_5-13-19-FU.pdf](http://finfix.org/USAppealsCt/Case_19-1032_Additional-Info-Available_5-13-19-FU.pdf)

**UNITED STATES COURT OF APPEALS  
THIRD DISTRICT**

VERONICA A. WILLIAMS,

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EISENBERG, PC; THE STATE OF NEW  
JERSEY

Defendants

UNITED STATES COURT OF APPEALS

Civ. No. 19-1032

**ADDITIONAL INFO AVAILABLE  
FOLLOW-UP TO 5/13/19 FILING**

**(THIS IS NOT A BRIEFING DOCUMENT)**

**REFERRED BY:**

U.S. District Court of NJ Case 2:16-cv-05301-ES-

**FOR PROBLEMS WITH:**

NJ Case Docket No. F – 000839-13

NJ Case Docket No. ESSX L – 004753-13

NJ Case Docket No. ESSX L – 000081-11

**ADDITIONAL INFORMATION SUPPORTS HEARING CASE IN FEDERAL COURT**

**Follow-up to May 13, 2019 Filing with U.S. Court of Appeals**

This filing documents my experience with the NJ Court on May 10, 2019. I reserve my opinion of individuals; I do criticize the process. I have additional evidence that further confirms why my case must be held in Federal Court. I can prepare and send it to the U.S. Court of Appeals or submit it during Discovery. If I do not receive a response I shall present it during Discovery.

I continue my effort to work towards resolution. Currently my only recourse appears to be with approval from the U.S. Court of Appeals to proceed to trial. Discovery will be extremely revealing and clarify case complexities. Interrogatories for all witnesses have been prepared.

With patience, I pray the Court allows me to proceed.

Respectfully submitted,

Veronica A. Williams  
Pro Se Counsel

/s/ Veronica A. Williams

Veronica A. Williams

[StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com)

(202) 486-4565

**PREPARED May 11, 2019**

Filed June 6, 2019



**ATTACHMENT I – Parking Receipt for May 10<sup>th</sup> Hearing**

LOCATION: 83 Academy St, Newark, NJ 07102-1711  
<https://www.parkfast.com/rutgers-parking>

DESTINATION: 212 Washington St. Newark, NJ 07102-2904  
<http://essexcountynj.org/essex-county-judiciary/>

**DISTANCE  
FROM  
NJ COURT:**

5 min. walk

528 feet

**NOTICE:**

Arrived 9:23 am

Left 4:15 pm

*F-000839-13*

**Edison Academy**

**(973) 623-0623**

**License # 007373**

**Parking Receipt**

*Scanned*

**Register 3 Sequence 3114**

**Credit Card Purchase**

**Account XXXXXXXXXXXXX3962**

**WILLIAMS/VERONICA**

**From:**

**09:23 May 10, 2019**

**To:**

**16:15 May 10, 2019**

**Elapsed time: day(s),**

**6 hour(s), 52 minute(s)**

**For \$19.00**

**Includes \$2.48 tax**

**83-91 Academy St.**

**Newark, NJ 07821**

## ATTACHMENT I – Recap of May 10, 2019 Hearing

I was disappointed with Judge Orsen’s decision, particularly since there is so much overwhelming evidence confirming that the mortgage is fraudulent. My testimony, the amortizations submitted and the document presented from Fremont all prove that my mortgage was \$38K NOT the \$291,418.35 on the fraud agreement. Additionally, the interest rate and terms are different than the agreement I signed.

Judge Orsen did give me ample opportunity to present my position. I thought we were in one accord that the Brief that I filed proved that the mortgage filed was not the agreement that I signed. The hearing lasted over 2 hours and all testimony and documents filed were clear.

With lightning speed, returned with a decision packed with case references that started with a statement that ignored multiple pieces of evidence in my brief and reiterated by me during the 3 hour hearing.

Judge Orsen’s opinion began with the statement that: *Williams signed a \$291,418.35 agreement ....* The full, accurate statement is available from the Court. I presented evidence that the mortgage was \$38K. The agreement that I signed vs. the fraudulent agreement are compared in the chart below:

MORTGAGE	SIGNED AND AGREED TO	FRAUDULENT
PRINCIPAL	\$38,399.67	\$291,418.36
INTEREST	7.25%	11.55%
TYPE	Firm Fixed	Adjustable
<b>SOURCE: Several documents referenced in <a href="#">CLICK HERE</a></b> <small>C:\CriticalFiles\CURRENT_Post2010\Veronica Williams\Legal_Prepaid\Case_LittonLoan\Financial-Injury_5-31-18.xlsx</small> <b>Mortgage History referenced in <a href="#">CLICK HERE</a></b> <small>C:\CriticalFiles\CURRENT_Post2010\Veronica Williams\Legal_Prepaid\Case_LittonLoan\Mortgage-History-wFinancials.xlsx</small>		

I DID NOT SIGN THE MORTGAGE AGREEMENT INCLUDED IN THE FORECLOSURE FILE. Moreover, there was not enough equity in my property to support the \$256, 018.68 cash out documented in the mortgage in the foreclosure file. The interest rate was at least triple going interest rates at that time. Evidence filed identifies several reasons that the mortgage in the foreclosure file is illegal.

To be honest, I do not know if Judge Orsen ruled because he did not believe the evidence I presented or, because reviewing the complete case documentation posed an undue burden to the NJ Court given the scope and nature of the illegal acts.

Mr. Seiden eliminated the possibility to appeal due to his physical absence because he made it quite clear that his objection to presenting the documents that I had prepared was based on legal grounds, NOT because he was not physically at the hearing to see them. Since I am not an attorney, I do not know if and how I can create another opportunity to explain why the information that I have is undeniable proof that the mortgage is fraudulent. The former employees that will support my proof are in California and New York. Most witnesses want the cover of a subpoena to protect them. I believe that will require power and money that neither the State of New Jersey nor I have.

**DEFENDANT DISAGREES WIDELY EMBRACED AND COMMON RATIONALE THAT CONTRIBUTES TO DECISION, AND DISAGREES WITH DECISION**

Judge Orsen, and other Judges, seem to believe that not making mortgage payments is reason to grant foreclosures. The numbers do not always support that reasoning. In my case, it would require at least 24 years for tax and insurance payments to equal the illegal amount added to the principal of my mortgage (see [Spreadsheet](#)). This does not include, however, the extreme costs added by the outrageously inflated interest rate (11.55% vs. 7.25%) and the costs for an adjustable rate vs. the fixed rate. I agreed to and signed a 7.25% fixed interest rate mortgage. These factors added costs would add another 10 years or more to the recovery time. Worse, the costs that I have incurred from the illegal foreclosure on my credit and public records escalate the payback to over 43 years, as well as into future lifetimes. A legal decision based on financial numbers *should be supported by the numbers*. In my case, **neither the financial numbers nor the facts support the mortgage or the foreclosure.**

It is up to industry professionals and citizens to provide Judges with the training and tools to enable them to make just decisions. Judges, understandably, want to err on the side of the established institutions if they do not understand the evidence and numbers presented to them.

The Plaintiff in my foreclosure case (F-000830-13) and many of the Defendants in my fraud case (US Court of Appeals 19-1032) are members of, and comply with regulations and protocols of, an established financial Authority . These include providing at least 10 days' notice before cancelling or changing a scheduled hearing, waiting more than 20 minutes for parties to join in telephonic hearings,

and waiting more than 40 minutes for parties to show up at in person hearings. The NJ Court rescheduled my hearing with about 15 hours' notice, and forced me to wait an additional 3 ½ hours after the hearing time had been moved ahead. I learned that the hearing was delayed when I called the NJ Court to confirm the location and Judge assigned. I learned that a different Judge was assigned and, when transferred to the Judge's office I was told that the hearing had been moved up from 9:00 am to 10:00 am.

The next day (~15 hours later), I was at the Court over 6 hours for a hearing that lasted a little over 2 hours! Worse, the Plaintiff's attorney was allowed to participate telephonically, while I was denied that opportunity. As I watched several parties arrive, attend their hearings and leave, I repeatedly asked when I would be called for my hearing.

When employees insisted that I was not waiting since 9:36 am, the two Court Officers came to my defense showing them the sign in sheet with my signature. The employees realized I was telling the truth. A Court employee told me after 12:00 pm that she would ask the Judge to hear my case. Once I was finally told that Judge Orsen would hear my case, I was only given 23 minutes to go and purchase, then eat lunch after waiting over almost 4 hours!

Judge Orsen was gracious and courteous to me. I thanked the Court for the opportunity to appear at the beginning of the hearing. To his credit, Judge Orsen asked astute probative questions that uncovered evidence that had been submitted to the NJ Superior Court years earlier. I did not know that documents already filed with the Court had to be refiled in advance of the hearing for my Motion. I did not have the documents that Judge Orsen asked for with me at the hearing. The law that the Plaintiff's attorney cited prevented that information from being considered.

When I saw Judge Orsen after he finished the hearing after mine, I thanked him for conducting himself professionally. The fact remains, nonetheless, that rather than issue a default judgement approving my Motion the Court *bent over backwards* for the attorney paid by HSBC and supported by Goldman Sachs and Ocwen. Judge Orsen was courteous in his demeanor; the procedures employed, however, were disrespectful and demeaning. *I do not believe Judge Orsen and his staff consciously saw the process as disrespectful.* So I restrained my anger and remained courteous despite my frustration and the insults I fielded.

The NJ Courts finally gave me an opportunity to be heard. Judge Orsen allowing me to present my brief has restored some of my belief in NJ Courts. My case includes acts that were committed coast to coast, and acts that violate Federal laws. Given the scope and nature of these acts, my case must be heard in Federal Court to properly litigate this action and receive a fair and just verdict.

NOTE: Names of Employees Have Been Withheld

**UNITED STATES COURT OF APPEALS  
THIRD DISTRICT**

<p>VERONICA A. WILLIAMS,</p> <p align="center">Appellant, Pro Se</p> <p align="center">v.</p> <p>LITTON LOAN SERVICING, HSBC BANK USA, N.A.; GOLDMAN SACHS GROUP; FREMONT HOME LOAN TRUST 2006-C MORTGAGE- BACKED CERTIFICATES, SERIES 2006-C; OCWEN FINANCIAL CORPORATION; STERN &amp; EISENBERG, PC; THE STATE OF NEW JERSEY</p> <p align="center">Defendants</p>	<p align="center">UNITED STATES COURT OF APPEALS</p> <p align="center">Civ. No. 19-1032</p> <p align="center"><b>ADDITIONAL INFO AVAILABLE</b></p> <p align="center"><b>(THIS IS NOT A BRIEFING DOCUMENT)</b></p> <p><b>REFERRED BY:</b> U.S. District Court of NJ Case 2:16-cv-05301-ES-</p> <p><b>FOR PROBLEMS WITH:</b> NJ Case Docket No. F – 000839-13 NJ Case Docket No. ESSX L – 004753-13 NJ Case Docket No. ESSX L – 000081-11</p>
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**CERTIFICATION OF SERVICE**

I, Veronica Williams, certify that on this 13<sup>th</sup> day of May 2019, a true and correct copy of this document will be sent to the parties via the method and as addressed below:

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

Veronica A. Williams  
Pro Se Counsel  
/s/ Veronica A. Williams  
[StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com)  
(202) 486-4565

**PREPARED May 11, 2019**

Filed June 6, 2019

**Enclosure III**  
***NOT ACCEPTED*-Deficiency Motion**

**Pages 1 – 10 of 682 total pages submitted in document that has legal binding and Bates numbers**

Veronica A. Williams  
 P.O. Box 978  
 South Orange, NJ 07079  
 Email StopFraud@vawilliams.com  
 Phone 973-715-8580

THIS DOCUMENT MAY BE DOWNLOADED AT

[http://finfix.org/NJSuperior\\_2019/Case-Docket\\_F-00839-13\\_Brief-for-Motion-Deficiency\\_5-24-19.pdf](http://finfix.org/NJSuperior_2019/Case-Docket_F-00839-13_Brief-for-Motion-Deficiency_5-24-19.pdf)

**SUPERIOR COURT OF NEW JERSEY**

HSBC Bank USA, National Association as  
 Trustee for Fremont Home Loan Trust 2006-  
 C, Mortgage-Backed Certificates, Series  
 2006-C

Plaintiff

Veronica Williams, et als.

Defendant, Pro Se

IN THE SUPERIOR COURT OF NEW JERSEY  
**ESSEX COUNTY**  
**CHANCERY DIVISION**

**Case No. F – 000839-13**

**BRIEF TO MEET MOTION DEFICIENCY  
 IN RESPONSE TO CHC2019204674:  
 EXECUTE INJUNCTON AGAINST SALE OF  
 541 SCOTLAND ROAD, SOUTH ORANGE, NJ,  
 and DISMISS FORECLOSURE, and  
 DISMISS MORTGAGE AGAINST 541  
 SCOTLAND ROAD, S. ORANGE, NJ**

**RELATED CASES:**

U.S. Court of Appeals, Third District 19-1032  
 U.S. District Court of NJ Case 2:16-cv-05301-ES-JAD  
 NJ Case Docket No. ESSX L – 004753-13  
 NJ Case Docket No. ESSX L – 000081-11

**BRIEF TO MEET MOTION DEFICIENCY IN RESPONSE TO  
 TRANSACTION ID CHC2019204698   
 IN SUPPORT OF MOTION FOR:  
 INJUNCTION AGAINST THE SALE OF 541 SCOTLAND ROAD, S. ORANGE, NJ AND  
 DISMISSAL OF FORECLOSURE AND  
 DISMISSAL OF MORTGAGE**

**Another Effort to Explain and Present the Truth**

This is another attempt to show the Court that the mortgage filed is fraudulent. Since my sworn testimony was not enough, and the documents that brought to the hearing support my explanation were not allowed, I am trying again. The evidence shows that:

- \$169,492.34 was fraudulently added to the principal of the mortgage agreement
- The interest rate was changed from 7.0% or 7.5% to 11.55%
- The type was changed from a FIXED RATE to an ADJUSTABLE RATE

These financial elements combine to a ***total extorted amount of \$1,087,011.83*** if I were to have acquiesced and paid the mounting costs charged by from this scam. If the mortgage servicers continue to pay my taxes and insurance, ***it would take at least 24 years to pay back the money*** they are attempting to steal.



The proof is in the numbers. Here is the financial breakdown:

<b>THE NUMBERS</b>			
<b>ACTION</b>	<b>YEAR</b>	<b>US DOLLAR</b>	<b>EXPLANATION</b>
Bought Home in 1983	1983	\$88,000	I first purchased my home.
Litton Loan Bought Mortgage	2005		
Refinanced with Fremont	2006	\$121,926.01	<a href="#">Total Amount Refinanced</a>
• Includes Balance of		\$38,339.67	Mortgage Balance • <a href="#">Proof Filed with NJ Courts in 2014</a> • <a href="#">Corroborated by Fremont 2007</a> <sup>1</sup>
• Includes Advance of		\$86,526.34	<a href="#">Cash Out received by Williams</a>
Made regular payments	1983-2009	\$286,486+	Plaintiff's Paid <i>at least</i> \$286,486.54 in monthly Interest & Principal
<a href="#">Fremont Filed Fraudulent Mortgage</a> pp. XX	2010	\$291,418.35	<a href="#">Cash Out \$169,492.34 never received !!</a>
Fraudulent Mortgage has different terms & conditions			<ul style="list-style-type: none"> <li>• Interest 11.55%, <i>signed off</i> on 7.25%</li> <li>• Principal \$261,000, <i>signed off</i> on \$121,926.01</li> <li>• Adjustable Rate, <i>signed off</i> on Firm Fixed Rate</li> </ul>
No. Years to Pay Plaintiff \$256,018 overstated principal As of foreclosure filing p. XX	24+		Mortgage holder must pay taxes and interest at least 24 years to cover overstated mortgage principal

SPREADSHEET C:\CriticalFiles\CURRENT\_Post2010\Veronica Williams\Legal\_Prepaid\Case\_LittonLoan\Financial-Injury\_5-31-18.xlsx [CLICK HERE](#)  
THE NUMBERS C:\CriticalFiles\CURRENT\_Post2010\Veronica Williams\Legal\_Prepaid\Case\_LittonLoan\COURT-NJ-Foreclosure\_2019\THE-NUMBERS.docx

Attachments VIII – XIII include evidence of the line items above.

**I KNOW, UNEQUIVOCALLY, THAT THE MORTGAGE FILED IS FRAUDULENT.** I also know the primary people who are responsible for the forgery and fraud. Since I have not been believed, however, I have initiated multiple investigations.

I was stonewalled throughout the foreclosure legal process<sup>2</sup>. My attorney was unable to extend the hearing on December 23, 2009 (Case F-28279-09). Although I made a desperate attempt to attend the hearing, I was unable to do so. Rather than acknowledge the “errors” with the mortgage, the Plaintiffs opened another foreclosure action. In my first attempt to fight the Plaintiffs’ illegal acts, Case No. L – 000081-11, neither the Plaintiffs (Defendants in this action) nor their attorneys showed up. In the other cases L – 004753-13 and F – 000839-13, hearings were held without my knowledge or presence. I was not informed of hearings when I was represented by Denbeaux and Denbeaux. I did not learn about the 2014 decision until years later! See Attachment XIX.

<sup>1</sup> Williams never considered Fremont’s offer a “modification” because the “mortgage” that was being *modified* was fraudulent – it was not the real, correct and valid mortgage.

<sup>2</sup> Federal torts laws protect against these and other actions by Defendants.

I am including the following information from the last document filed with the Superior Court on May 15, 2019.

This document presents the Motion WITH SELECTED EVIDENCE THAT SUPPORTS each point. The evidence provided should be more than sufficient, however, additional information is available – if necessary – from the 8,000 pages filed. The foreclosure was fraudulent, it was executed deceptively, and William has repeatedly been denied due process in her numerous attempts to be heard by the Courts.

The fraudulent mortgage and other evidence of the crimes in this case are evidenced in filings with the NJ Superior Court, the U.S. District Court of New Jersey, the U.S. Court of Appeals, Third District and several Federal Agencies. The injunction and both dismissals should be granted for several reasons, including:

- The mortgage in the foreclosure documents is fraudulent. The principal amount, interest rate, type of interest and terms are not what Williams agreed to. See Attachment I
- The mortgage was filed after the foreclosure was filed; over 2 years after allegedly executed.
- Foreclosure hearings were held without the knowledge or presence of the property owner, named in the foreclosure. See Attachment II
- The foreclosure case filings contain extensive false information. See Attachment III
- The first law firm hired to seek the foreclosure had accurate information and notified the property owner. See Attachment IV
- A second law firm was hired, used false information, and did not give the property owner sufficient notice. See Attachment III
- The NJ Judge who signed the final order DID NOT preside over the foreclosure hearing. Neither Judge listened to the property owner. See Attachment V
- The property owner's cases (NJ Case Docket No. ESSX L – 000081-11, NJ Case Docket No. ESSX L – 004753-13, U.S. District Court of NJ Case 2:16-cv-05301-ES-JAD, U.S. Court of Appeals, Third District 19-1032) include *more than 7* witnesses who were involved in or directly responsible for creating the fraudulent mortgage. See Attachment VI
- The loss incurred by the property owner, thus far, vastly exceeds the amount of the mortgage and the value of the property. See Attachment VII
- If necessary, I can subpoena legal and financial professionals who are aware of dubious actions by firms involved in this fraud.

An additional copy of supporting filings and documents (over 16GB) was provided to the Court on a thumb drive with the Motion. Defendants have been given multiple copies of everything.

## CLOSING FOR THIS FILING

The thumb drive that I submitted was returned to me by the Clerk of the Superior Court of New Jersey. Since the Court does not accept thumb drives, and paper documents further exacerbate the difficulty in understanding the financial and operational intricacies of this case, I request that the Court allow me to explain the filed information using the underlying digital files. I can present them at the hearing using a PC and computer projection machine.

I have a moral and civic responsibility to shine light on flaws in the processes that enable financial fraud, and to take steps to stop it. I will do so. Removing my illegal foreclosure is an important early step. This document should clarify the forged, modified agreement for the Court. Results from the investigations initiated should allow law enforcement to stop potential continuing acts by the perpetrators. My other efforts will define measures that can dramatically help protect others in the future.

The focus of this motion is on reversing the illegal foreclosure and fraudulent mortgage that underlies it. The other fraud in this case is being litigated and mitigated in separate actions and initiatives.

Respectfully submitted,

Veronica A. Williams  
Pro Se Counsel

/s/ Veronica A. Williams

Veronica A. Williams  
[StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com)

(202) 486-4565

May 26, 2019

I, Veronica Williams, authored and created a storyboard to simplify the explanation of how this fraud was conducted. The storyboard incorporates documents filed with the State of New Jersey, the Federal Courts and multiple Federal Agencies. Slides and pages from the storyboard are referenced in the attachments as well as many filings and some of the 1,140+ evidence items. I will gladly provide or explain any and all of the documents that indisputable support my multifaceted motion.

## ATTACHMENTS TO MAY 15, 2019 AND TO THIS FILING

SECTION	CONTENTS	Page No.
Attachment I	Evidence of Fraudulent Mortgage	4 – 9
Attachment II	NJ Holds Hearings without Williams – <i>denying her due process</i>	10
Attachment III	Foreclosure Case Filings Filed with False Information	11 – 28
Attachment IV	First Law Firm Had Correct Information for Williams – Notified Her	29
Attachment V	Judge Klein Heard Foreclosure Case – Judge Innes Signed Foreclosure	30
Attachment VI	More Than 7 Witnesses To Confirm Fraudulent Mortgage	31 – 35
Attachment VII	Fraud Imposes Damages Order of Magnitude Greater than Property – Related Costs	36
Additional Info	EXTENSIVE FILINGS, EVIDENCE, ANALYSIS INCLUDED ON THUMB DRIVE FILED WITH MOTION	
Attachment VIII	<b>ACTION:</b> Bought Home in 1983	
Attachment IX	<b>ACTION:</b> Refinanced with Fremont (AMOUNT OF ATTEMPTED SCAM)	
Attachment X	<b>ACTION:</b> <a href="#">Proof Filed with NJ Courts in 2014</a>	
Attachment XI	<b>ACTION:</b> <a href="#">Corroborated by Fremont 2007</a>	
Attachment XII	<b>ACTION:</b> <a href="#">Cash Out received by Williams</a>	
Attachment XIII	<b>ACTION:</b> <a href="#">Fremont Filed Fraudulent Mortgage</a>	
Attachment XIX	Documents Identifying Actions to Deflect by Defendants	

**ATTACHMENT I**

- The mortgage in the foreclosure documents is fraudulent. The principal amount, interest rate, type of interest and terms *are not what Williams agreed to.*

I knew right away – when Fremont quoted me a monthly payment of were \$3,000 rather than the approx. \$1,000 correct amount – that they were **trying to earn more in interest alone than \$ 614,733.33 more** than the mortgage I had signed up for. Once the equity grab and extraneous fees are added, the **total amount of the intended GRAND THEFT is at least \$1,039,630.58**. I had already agreed to pay \$35,399 more in interest than was necessary just to get out of Litton Loan’s fraudulent grasp. Doing that doubled what was necessary to retire my mortgage, from ~\$35,000 to ~\$70,000. I agreed to a principal of ~\$70,000, a firm fixed interest rate of 7% amortized over 30 years. The mortgage agreement that Fremont, Litton Loan and the Stated of New Jersey revealed in 2017, 10 years later, was a fraudulent agreement with \$261,000 principal; 11.25% adjustable interest rate that had not been seen in over 30 years! This is an obvious act of criminal ignorance of finance: An impossible principal based on my 20+ year payment history, an interest rate not seen since the hyper inflated 1970’s, and with an adjustable ride only a fool could have agreed to!

Discovery pp. USDC Case 2:16-05301 Filing# 57 (LIBOR),  
 USDCNJ #57 Additional Evidence of Mortgage Fraud (LIBOR) [OL](#)  
**Fremont Mortgage (agreement & SPREADSHEET)**

**The \$1M+ amount pales in comparison to the damages imposed on Williams due to this fraud.**

<b>AMOUNT OF ATTEMPTED SCAM</b>					
			<b>BALANCE</b>	<b>ADVANCE</b>	<b>TOTAL PRINCIPAL</b>
Mortgage Refi Interest Cost Correct	\$58,330.67		35,399.67	50,000.00	85,399.67
Fake Mortgage Refi Interest Cost (SPREADSHEET AMOR	\$673,142.00		35,399.67	225,600.33	261,000.00
Equity Grab by Fake Mortgage	\$225,600.33				
Extraneous Fees by Fake Mortgage	\$140,888.25				
Fake Mortgage Cost Less Correct Mortgage Cost	\$614,811.33				
<b>TOTAL GRAND THEFT FROM FAKE MORTGAGE</b>	<b>\$1,039,630.58</b>				
Principal per Seiden photon email	750,000.00				
Advance per Williams Recollection	50,000.00				
Principal per Fremont's verbal bill		\$3,100			
Principal per Fake Mortgage in Foreclosure Docs	261,000.00	11.55%			

**NOTE: FREMONT CONFIRMED BALANCE OF \$35,339.67 WHICH IS MONTHLY PMT. OF \$1,XXX**

**SOURCE OF THIS CALCULATION:** C:\CriticalFiles\CURRENT\_Post2010\Veronica Williams\Legal\_Prepaid\Case\_LittonLoan\Financial-Injury\_5-31-18.xlsx  
**SUPPORTING WORKSHEETS AVAILABLE UPON REQUEST**

SOURCE ENTIRE SECTION: STORYBOARD SLIDE #19, p. 27

**ATTACHMENT I cont'd.**

Case files include files from NJ cases [F-000839-13](#)<sup>3</sup> and [L-004753-13](#)<sup>4</sup>. I never received most of the correspondence alleged to have been sent to me in the Foreclosure case filings in [Attachment V](#). I thought the corrected mortgage agreement was in Litton Loan's files and knew that it had not been filed with Essex County New Jersey as of 2010."

P. 106 USDC Filing #99 [FILED BY VW](#) ♦ [IN COURT FILES](#) ♦ [DOC ON PC](#)

INDEX FROM FORECLOSURE FILE F-000839-13 [OL](#) [PC](#) .....Case-Files\_Index\_CURRENT.docx

Evidence Item #730 [OL](#) [PC-Folder](#) [http://finfix.org/proof/FCLOSE/1\\_Case-Files\\_Index\\_6-13-17.pdf](http://finfix.org/proof/FCLOSE/1_Case-Files_Index_6-13-17.pdf)

SOURCE: STORYBOARD SLIDE #42, p. 17

Fremont acknowledged the catastrophic error in my mortgage and promised to correct it. They sent me a new document but went out of business before it was processed.

CORRECT MORTGAGE DOCUMENT FROM FREMONT – PRESENTED IN THE FOLLOWING PAGES

SOURCE: Case Files [CLICK HERE](#)

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<sup>3</sup> Case files may be viewed at <http://finfix.org/proof/NJ-CASE-F-000839-13>.

<sup>4</sup> Case files may be viewed at <http://finfix.org/proof/NJ-CASE-L-004753-13>

**THIS IS THE CONFIRMATION AGREEMENT WILLIAMS RECEIED FROM FREMONT  
THE FULL DOCUMENT IS AVAILABLE UPON REQUEST**

Office Address:  
Fremont Investment & Loan  
3110 E. Gauss Rd.  
Ontario, CA 91761



Phone: 909-484-0291  
Fax: 714-431-1283

# Fax

<b>To:</b> Veronica Williams	<b>From:</b> Lorraine
<b>Fax:</b> 888 492 5864	<b>Pages:</b> 10
<b>Date:</b> 11/14/07	<b>CC:</b>
<b>Re:</b> 9000082816	

Urgent     For Review     Please Comment     Please Reply     Please Recycle

**\* Comments:**

Please review, sign and return via fax 714 431 1283

THIS TRANSMISSION IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY TO WHOM IT IS ADDRESSED AND MAY CONTAIN INFORMATION THAT IS PRIVILEGED, CONFIDENTIAL, AND EXEMPT FROM DISCLOSURE UNDER APPLICABLE LAW. IF THE READER OF THIS TRANSMISSION IS NOT THE INTENDED RECIPIENT OR THE PERSON RESPONSIBLE FOR DELIVERING THE TRANSMISSION TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU RECEIVE THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US BY TELEPHONE IMMEDIATELY. THANK YOU.



Loss Mitigation Department  
3110 E. Guasti Rd  
Ontario, CA. 91761  
Tel No. (951) 484-0291

11/9/2007

Veronica Williams  
541 Scotland Rd  
South Orange, NJ. 07079

RE: Loan: 8000082616  
Property: 541 Scotland Rd  
South Orange, NJ. 07075  
Dear Veronica Williams

Congratulations! You have been approved for a Loan Modification. This modification changes the interest rate for the remaining term of the loan, effective 11/1/07 to an interest rate of 7.25% and your principal and interest payment effective as of 12/1/07 to 2,050.60. If your loan is impounded for Taxes and/or Insurance the amount added to this payment will be your monthly escrow collection of 5990.17 this is based on the last analysis and is subject to change yearly based on your premiums. Please find attached the itemization page with the breakdown of the capitalization.

Enclosed please find two original copies of the Loan Modification Document, one for your records. Please review the Loan Modification Agreement and sign your name exactly as it is printed under the signature line. All parties listed under the agreement must sign. Please fax a copy of the signed documents to my attention at fax : (714)431-1283 AND mail the original documents using the self addressed Federal Express label enclosed.

In addition to the documents, please include your down payment in the amount of \$6,295.21. All funds should be made by Western Union Quick Collect to the following:

Code City: Investors  
Code State: CA  
Attention: Loan Number

Or by certified funds payable to Fremont Investment & Loan and mailed to:

Fremont Investment & Loan  
Attn: Loss Mitigation  
3110 Guasti Road, Ste. 500  
Ontario, CA. 91761

Please be advised that we must receive both the signed agreement and the down payment no later than 11/16/2007, failure to comply may result in Fremont & Investment & Loan's rescission of this loss mitigation option.

Fremont Investment Loan is a debt collector and is attempting to collect a debt, any information obtained will be used for that purpose.

P. 02

ON FAX

NOV-14-2007 WED 10:55 AM





Loss Mitigation Department  
 3110 E. Gessell Rd  
 Ontario, CA 91761  
 Tel No. (999) 484-0221

**Total Amount Due:**

Principal & Interest Payments:	\$33,730.19
Escrow Payments:	\$12,065.21
Late Charges:	\$1,815.02
NSF Fees:	\$0.00
Delinquent Taxes:	\$0.00
Placed Coverage Insurance:	\$0.00
Property Inspection/Appraisal/BPO Fees:	\$613.00
Foreclosure Fees & Cost:	\$2,195.21
Interest on Corporate Advances:	\$65.28
Non-Refundable Modification Fee:	\$0.00
Less Suspense Credits:	\$5,770.00
<b>TOTAL AMOUNT DUE:</b>	<b>\$44,713.91</b>

**Itemization of Capitalization:**

The following is a breakdown of the amounts we have including in your Capitalization Modification. These items will be spread over the remaining term of your loan per the terms of your Agreement:

Interest Payments:	\$32,526.18
Delinquent Taxes:	\$0.00
Placed Coverage Insurance:	\$0.00
Property Inspection/Appraisal/BPO Fees:	\$613.00
Foreclosure Fees & Cost:	\$2,195.21
Interest on Corp Advances:	\$65.28
Less Suspense Credits:	\$5,770.00
Less Down Payment:	\$6,285.21
<b>TOTAL AMOUNT OF CAPITALIZATION:</b>	<b>\$35,399.67</b>

**Outstanding Items:**

Please be advised that we do not include outstanding Late Charges or NSF fees in the modification. The following amounts will still remain outstanding and are responsible to pay:

Late Charges:	\$1,815.02
NSF Fees:	\$0.00
<b>TOTAL AMOUNT OUTSTANDING:</b>	<b>\$1,815.02</b>

Please be advised that all figures reflected on this page were as of the date of: 11/9/2007  
 any additional fees/costs charged to the loan will not be reflected in the Modification Agreement and will be the responsibility of the borrower to pay as stated in the terms of the Note Agreement.

If you have any questions regarding this matter please feel free to contact me at (909)418-3616 extension # 3616

Sincerely,  
 Elizabeth Rayford  
 Loss Mitigation Specialist

Fremont Investment Loan is a debt collector and is attempting to collect a debt; any information obtained will be used for that purpose.

# **Enclosure IV**

## **Proof of Delivery of Motion**

# USPS Tracking®

FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

Track Another Package +

Tracking Number: EE452578118US

Remove X

Scheduled Delivery by

**WEDNESDAY**

**29** MAY 2019 ⓘ

by **12:00pm** ⓘ

 **Delivered**

May 29, 2019 at 6:57 am  
Delivered  
TRENTON, NJ 08625

Get Updates ✓

Feedback

---

Text & Email Updates



---

Proof of Delivery



---

Tracking History



---

Product Information



---

See Less ^

**Can't find what you're looking for?**

Go to our FAQs section to find answers to your tracking questions.

**FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)**

Feedback

## **The easiest tracking number is the one you don't have to know.**

With Informed Delivery<sup>®</sup>, you never have to type in another tracking number. Sign up to:

- See images\* of incoming mail.
- Automatically track the packages you're expecting.
- Set up email and text alerts so you don't need to enter tracking numbers.
- Enter USPS Delivery Instructions<sup>™</sup> for your mail carrier.

### **Sign Up**

**([https://reg.usps.com/entreg/RegistrationAction\\_input?](https://reg.usps.com/entreg/RegistrationAction_input?app=UspsTools&appURL=https%3A%2F%2Ftools.usps.com%2Fgc)**

**\*NOTE: Black and white (grayscale) images show the outside, front of letter-sized envelopes and mailpieces that are processed through USPS automated equipment.**

**Enclosure V**  
**SUBPOENA Submitted**

Veronica A. Williams  
P.O. Box 978  
South Orange, NJ 07079  
Email StopFraud@vawilliams.com  
Phone 973-715-8580

THIS DOCUMENT MAY BE DOWNLOADED AT

[http://finfix.org/NJSuperior\\_2019/Case-Docket\\_F-00839-13\\_Subpoenas-Filed\\_5-31-19.pdf](http://finfix.org/NJSuperior_2019/Case-Docket_F-00839-13_Subpoenas-Filed_5-31-19.pdf)

**SUPERIOR COURT OF NEW JERSEY**

HSBC Bank USA, National Association as  
Trustee for Fremont Home Loan Trust 2006-  
C, Mortgage-Backed Certificates, Series  
2006-C

Plaintiff

Veronica Williams, et als.

Defendant, Pro Se

IN THE SUPERIOR COURT OF NEW JERSEY  
**ESSEX COUNTY**  
**CHANCERY DIVISION**

**Case No. F – 000839-13**

**SUBPOENAS  
TO MEET MOTION DEFICIENCY  
IN RESPONSE TO CHC2019204674:**

**EXECUTE INJUNCTION AGAINST SALE OF  
541 SCOTLAND ROAD, SOUTH ORANGE, NJ,  
and DISMISS FORECLOSURE, and  
DISMISS MORTGAGE AGAINST 541  
SCOTLAND ROAD, S. ORANGE, NJ**

**RELATED CASES:**

U.S. Court of Appeals, Third District 19-1032

U.S. District Court of NJ Case 2:16-cv-05301-ES-JAD

NJ Case Docket No. ESSX L – 004753-13

NJ Case Docket No. ESSX L – 000081-11

**SUBPEONAS TO MEET MOTION DEFICIENCY IN RESPONSE TO  
TRANSACTION ID CHC2019204698**

**Subpoenas to Litton Loan Servicing, TD Bank and Northwestern Mutual**

Three subpoenas are enclosed to be served on Litton Loan Servicing, TD Bank and Northwestern Mutual Life Insurance Company. This service is necessary to respond to the refusal of the Defendants and their counsel to acknowledge evidence and testimony provided by Veronica Williams. Williams cannot afford all subpoenas for the forged mortgage at this time. THESE SUBPOENAS ARE ONLY FOR THE FRAUDULENT MORTGAGE AND ILLEGAL FORECLOSURE. SUBPEONAS TO SUPPORT FRAUD WILL BE ISSUED SEPARATELY.

The other fraud in this case is being litigated and mitigated in separate actions and initiatives.

Respectfully submitted,

Veronica A. Williams  
Pro Se Counsel

/s/ Veronica A. Williams

Veronica A. Williams

[StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com)

(202) 486-4565

May 31, 2019

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**SUPERIOR COURT OF NEW JERSEY**

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HSBC Bank USA, National Association as  
Trustee for Fremont Home Loan Trust 2006-C,  
Mortgage-Backed Certificates, Series 2006-C

Plaintiff

Veronica Williams, et als.

Defendant, Pro Se

IN THE SUPERIOR COURT OF NEW JERSEY  
**ESSEX COUNTY**  
**CHANCERY DIVISION**

**Case No. F – 000839-13**

**MOTION TO:**

**EXECUTE INJUNCTION AGAINST SALE  
OF 541 SCOTLAND ROAD, SOUTH  
ORANGE, NJ, and  
DISMISS FORECLOSURE and  
DISMISS MORTGAGE AGAINST 541  
SCOTLAND ROAD, S. ORANGE, NJ**

**RELATED CASES:**

U.S. Court of Appeals, Third District 19-1032

U.S. District Court of NJ Case 2:16-cv-05301-ES-JAD

NJ Case Docket No. ESSX L – 004753-13

NJ Case Docket No. ESSX L – 000081-11

---

**CERTIFICATION OF SERVICE**

I, Veronica Williams, certify that on this 31<sup>st</sup> day of May 2019, a true and correct copy of this document will be sent to the parties via the method and as addressed below:

**Via Email**

Steven Keith Eisenberg, Esq  
Attorney for Stern & Eisenberg

Senior Partner  
Stern & Eisenberg, PC  
1581 Main Street, Suite 200  
Warrington, PA 18976  
Office 267-620-2130  
Fax 215-572-5025  
[jefis@sterneisenberg.com](mailto:jefis@sterneisenberg.com)

**Via Email**

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  
[ethics@ethics.nj.gov](mailto:ethics@ethics.nj.gov)  
[OBCCR@njdcj.org](mailto:OBCCR@njdcj.org)

**Via Email**

Stuart I. Seiden, Associate  
Brett Messinger, Partner  
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  
[siseiden@duanemorris.com](mailto:siseiden@duanemorris.com) and  
[LMTRYON@DUANEMORRIS.COM](mailto:LMTRYON@DUANEMORRIS.COM)

Respectfully submitted,

Veronica A. Williams  
Pro Se Counsel  
/s/ Veronica A. Williams  
[StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com)  
(202) 486-4565

May 31, 2019

**Plaintiff or Filing Attorney Information:**

Name Veronica A. Williams , Per Se  
NJ Attorney ID Number \_\_\_\_\_  
Address P.O. Box 978  
South Orange, NJ 07079  
Telephone Number 202-486-4565

HSBC Bank USA, National Association as Trustee  
for Fremont Home Loan Trust 2006-C,  
Mortgage-Backed Certificates, Series 2006-C

\_\_\_\_\_,  
Plaintiff,

v.

Veronica Williams,

Defendant.

Superior Court of New Jersey  
Chancery Division Essex \_\_\_\_\_ County  
General Equity Part

Docket No. F-000839-13

CIVIL ACTION

*Subpoena Duces Tecum*

**STATE OF NEW JERSEY TO:** Litton Loan c/o Ocwen Financial Corp., 1661 Worthington Road, Suite 100, West Palm Beach, Florida 33409

**YOU ARE HEREBY COMMANDED** to appear in person before the Superior Court of New Jersey, Chancery Division, Essex \_\_\_\_\_ County, Foreclosure \_\_\_\_\_ Part, at the Court House located at 212 Washington St, Room 8<sup>th</sup> floor, Newark, NJ 07102 on \_\_\_\_\_ at \_\_\_\_\_ a.m./ p.m. and there to testify as a witness in the above- captioned matter.

**YOU ARE ALSO COMMANDED** to bring with you and to produce at that time the following described books, papers, documents and other tangible things:

1. All information since 2004, including monthly statements, for **ALL** Accounts for Veronica Williams & property at 541 Scotland Road, South Orange, NJ 07079 **including but not limited to Mortgage Loan No. 40212367**
2. Information should include, but is not limited to, account balances **acquired by & transferred to** Litton Loan in 2005 and balances **transferred to** Fremont Investment & Loan in 2006

Provided that if you are notified that a motion to quash the subpoena has been filed, the subpoenaed evidence shall not be produced or released until ordered to do so by the court or the release is consented to by all parties to the action.

Failure to appear or comply with the command of this Subpoena will subject you to the penalties provided by law.

Dated: \_\_\_\_\_

Michelle M. Smith, Clerk of the Superior Court



PROOF OF SERVICE

I, \_\_\_\_\_, being over the age of 18, served the attached subpoena by delivering a copy to \_\_\_\_\_ at \_\_\_\_\_ and by handing him/her the fee of \$2.00 for one day's attendance and, if applicable, a mileage fee of \$\_\_\_\_\_, as allowed by law

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date \_\_\_\_\_

Signature \_\_\_\_\_

**Plaintiff or Filing Attorney Information:**

Name Veronica A. Williams , Per Se  
NJ Attorney ID Number \_\_\_\_\_  
Address P.O. Box 978  
South Orange, NJ 07079  
Telephone Number 202-486-4565

HSBC Bank USA, National Association as Trustee  
for Fremont Home Loan Trust 2006-C,  
Mortgage-Backed Certificates, Series 2006-C

\_\_\_\_\_,  
Plaintiff,

v.

Veronica Williams,

Defendant.

Superior Court of New Jersey  
Chancery Division Essex \_\_\_\_\_ County  
General Equity Part

Docket No. F-000839-13

CIVIL ACTION

*Subpoena Duces Tecum*

**STATE OF NEW JERSEY TO:** TD Bank , US Headquarters, 1701 Route 70 East, Cherry Hill, NJ 08034

**YOU ARE HEREBY COMMANDED** to appear in person before the Superior Court of New Jersey,  
Chancery Division, Essex \_\_\_\_\_ County, Foreclosure \_\_\_\_\_ Part, at the Court House located at  
212 Washington St, Room 8<sup>th</sup> floor, Newark, NJ 07102 \_ on \_\_\_\_\_ at \_\_\_\_\_ a.m./ p.m. and there  
to testify as a witness in the above- captioned matter.

**YOU ARE ALSO COMMANDED** to bring with you and to produce at that time the following  
described books, papers, documents and other tangible things:

1. All statements, including monthly statements, for Account No. 3451044323 from 1983 – Jan. 2019
2. ALL Detailed information on wire transfer from Fremont Investment & Loan or Freedom Bank on 3/31/2006 (\$86,526.34 or correct amount)
3. \_\_\_\_\_

Provided that if you are notified that a motion to quash the subpoena has been filed, the  
subpoenaed evidence shall not be produced or released until ordered to do so by the court or the release  
is consented to by all parties to the action.

Failure to appear or comply with the command of this Subpoena will subject you to the penalties  
provided by law.

Dated: \_\_\_\_\_  
Michelle M. Smith, Clerk of the Superior Court

PROOF OF SERVICE

I, \_\_\_\_\_, being over the age of 18, served the attached subpoena by delivering a copy to \_\_\_\_\_ at \_\_\_\_\_ and by handing him/her the fee of \$2.00 for one day's attendance and, if applicable, a mileage fee of \$\_\_\_\_\_, as allowed by law

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date \_\_\_\_\_

Signature \_\_\_\_\_

**Plaintiff or Filing Attorney Information:**

Name Veronica A. Williams , Per Se  
NJ Attorney ID Number \_\_\_\_\_  
Address P.O. Box 978  
South Orange, NJ 07079  
Telephone Number 202-486-4565

HSBC Bank USA, National Association as Trustee  
for Fremont Home Loan Trust 2006-C,  
Mortgage-Backed Certificates, Series 2006-C  
\_\_\_\_\_  
Plaintiff,  
v.  
Veronica Williams,  
Defendant.

Superior Court of New Jersey  
Chancery Division Essex \_\_\_\_\_ County  
General Equity Part  
\_\_\_\_\_  
Docket No. F-000839-13

CIVIL ACTION  
*Subpoena Duces Tecum*

**STATE OF NEW JERSEY TO:** Northwestern Mutual Life Insurance , 720 East Wisconsin Ave., Milwaukee, WI 53202 Phone 414-661-1444

**YOU ARE HEREBY COMMANDED** to appear in person before the Superior Court of New Jersey, Chancery Division, Essex \_\_\_\_\_ County, Foreclosure \_\_\_\_\_ Part, at the Court House located at 212 Washington St, Room 8<sup>th</sup> floor, Newark, NJ 07102 on \_\_\_\_\_ at \_\_\_\_\_ a.m./ p.m. and there to testify as a witness in the above- captioned matter.

**YOU ARE ALSO COMMANDED** to bring with you and to produce at that time the following described books, papers, documents and other tangible things:

1. All information since 1979, including monthly statements, for ALL Accounts for Veronica Williams including but not limited to Account Nos. 8887817 , 9248239 , 8307112
2. Information should include all disbursements including front and back of checks processed

Provided that if you are notified that a motion to quash the subpoena has been filed, the subpoenaed evidence shall not be produced or released until ordered to do so by the court or the release is consented to by all parties to the action.

Failure to appear or comply with the command of this Subpoena will subject you to the penalties provided by law.

Dated: \_\_\_\_\_  
Michelle M. Smith, Clerk of the Superior Court

PROOF OF SERVICE

I, \_\_\_\_\_, being over the age of 18, served the attached subpoena by delivering a copy to \_\_\_\_\_ at \_\_\_\_\_ and by handing him/her the fee of \$2.00 for one day's attendance and, if applicable, a mileage fee of \$\_\_\_\_\_, as allowed by law

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Date \_\_\_\_\_

Signature \_\_\_\_\_

# **Enclosure VI**

## **Proof of Delivery**

# USPS Tracking®

FAQs > (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

## Track Another Package +

Tracking Number: 9505515788739150006879

Remove X

Expected Delivery on

**SATURDAY**

**1** JUNE  
2019 ⓘ

by  
**8:00pm** ⓘ

 **Delivered**

June 1, 2019 at 6:15 am  
Delivered  
TRENTON, NJ 08625

Get Updates ▾

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Text & Email Updates



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Tracking History



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Product Information



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See Less ^

Feedback

## Can't find what you're looking for?

Go to our FAQs section to find answers to your tracking questions.

## FAQs (<https://www.usps.com/faqs/uspstracking-faqs.htm>)

### The easiest tracking number is the one you don't have to know.

With Informed Delivery®, you never have to type in another tracking number. Sign up to:

- See images\* of incoming mail.
- Automatically track the packages you're expecting.
- Set up email and text alerts so you don't need to enter tracking numbers.
- Enter USPS Delivery Instructions™ for your mail carrier.

### Sign Up

([https://reg.usps.com/entreg/RegistrationAction\\_input?](https://reg.usps.com/entreg/RegistrationAction_input?app=UspsTools&appURL=https%3A%2F%2Ftools.usps.com%2Fgc)

\*NOTE: Black and white (grayscale) images show the outside, front of letter-sized envelopes and mailpieces that are processed through USPS automated equipment.

Feedback



**UNITED STATES COURT OF APPEALS  
THIRD DISTRICT**

<p>VERONICA A. WILLIAMS,</p> <p style="text-align: center;">Appellant, Pro Se</p> <p style="text-align: center;">v.</p> <p>LITTON LOAN SERVICING, HSBC BANK USA, N.A.; GOLDMAN SACHS GROUP; FREMONT HOME LOAN TRUST 2006-C MORTGAGE- BACKED CERTIFICATES, SERIES 2006-C; OCWEN FINANCIAL CORPORATION; STERN &amp; EISENBERG, PC; THE STATE OF NEW JERSEY</p> <p style="text-align: center;">Defendants</p>	<p style="text-align: center;">UNITED STATES COURT OF APPEALS</p> <p style="text-align: center;">Civ. No. 19-1032</p> <p style="text-align: center;"><b>ADDITIONAL INFO AVAILABLE</b></p> <p style="text-align: center;"><b>(THIS IS NOT A BRIEFING DOCUMENT)</b></p> <p><b>REFERRED BY:</b> U.S. District Court of NJ Case 2:16-cv-05301-ES-</p> <p><b>FOR PROBLEMS WITH:</b> NJ Case Docket No. F – 000839-13 NJ Case Docket No. ESSX L – 004753-13 NJ Case Docket No. ESSX L – 000081-11</p>
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**CERTIFICATION OF SERVICE**

I, Veronica Williams, certify that on this 6<sup>th</sup> day of June 2019, a true and correct copy of this document will be sent to the parties via the method and as addressed below:

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

Respectfully submitted,

Veronica A. Williams  
Pro Se Counsel  
/s/ Veronica A. Williams  
[StopFraud@vawilliams.com](mailto:StopFraud@vawilliams.com)  
(202) 486-4565

June 6, 2019