

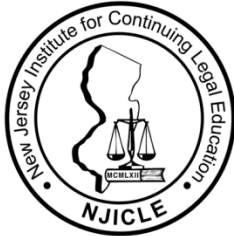


IN REM TAX FORECLOSURES: A WEBINAR

Keith A. Bonchi, Esq.
Goldenberg Mackler Sayegh Mintz
Pfeffer Bonchi & Gill (Northfield)

Sharon Lorenzini
Paralegal, Goldenberg Mackler Sayegh
Mintz Pfeffer Bonchi & Gill (Northfield)

WRPP021617



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Thank you for logging in. We will begin shortly.

IN REM TAX FORECLOSURES



Using The Online Classroom

1. All Attendee phone lines are muted.
2. Questions may be submitted
 - Via Chat on the right hand side of your screen.
 - Questions will be answered periodically during the presentation

Note: Attendees with dial up connections will see a slower response.



Asking Questions – Easy as 1,2,3

3. See your messages here

1. Type your question here.

2. Send

The screenshot shows a web-based chat interface. At the top, there's a 'Participants' section with a list of names and a 'Feedback' link. Below that, there's a toolbar with icons for 'Make Presenter', 'Audio', 'Mute', and other functions. A 'Chat' window is open, showing a 'Send to:' dropdown menu set to 'All Participants'. Below the dropdown is a text input field with a 'Send' button. The chat area above the input field is currently empty.



Technical Difficulties??

If you experience technical difficulties during today's webinar, please hit #0 and an operator will assist you



ATTENDANCE VERIFICATION

+ PLEASE FAX OR E-MAIL YOUR ATTENDANCE
VERIFICATION FORM TO NJICLE

+ FAX: 732-249-1428

+ E-MAIL: smilek@njsba.com



SEMINAR MATERIALS AND CLE FORMS

TO ACCESS SEMINAR MATERIALS,
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PLEASE GO

TO THE LINK THAT WAS E-MAILED TO YOU
TODAY.



IN REM FORECLOSURES A WEBINAR

Keith A. Bonchi, Esq.
Sharon Lorenzini, Paralegal
660 New Road, 1st Floor
Northfield, NJ 08225
(609) 646-0222

In Rem Tax Foreclosure Act (1948)
N.J.S.A. 54:5-104.29 et. seq.

- Used exclusively by municipalities until 2015 (amended C 15, PL 2015) to allow private lien holder to foreclose *In Rem* on abandoned properties.

Why Do Municipalities Foreclose *In Rem*?

- To compel payment of taxes.
- To remove non-performing properties from tax rolls.
- To increase collection rate to lower reserve for uncollected taxes.
- To control abandoned properties.
- To stabilize tax base.

Prior to Instituting Foreclosure a Municipality Should

- Pass a resolution appointing counsel to do the *In Rem*.
- Pass a resolution listing the lands to be foreclosed.
- Identify which tax sale certificates are to be foreclosed.
- Budget the funds necessary to pay for the foreclosure.

NOTE: Check to see if properties are contaminated

Ordering Foreclosure Searches

- Quality of Title Company
- Costs
- 60 year county searches
- Judgment searches – 20 years last past
- Up to 200 properties can be included in one complaint.

N.J.S.A. 54:5-104.34

“Time for Institution of Action”

- More than 6 months expired from tax sale.
- All or any portion of general land taxes levied and assessed the land for 21 months preceding the action.
- Amendment effective January 5, 1996, provides: “Such action on a tax sale certificate may include the lien for unpaid taxes, utility liens or any other municipal liens in conjunction with or independent of one another.” Thus, certificates foreclosed *In Rem* on or after January 5, 1996, need not be based on general land taxes which was a previous limitation.

Please note that N.J.S.A. 54:5-86
(6) states:

“Any person holding a tax sale certificate on a property that meets the definition of abandoned property as set forth in P.L. 2003, c. 210 (c. 55:19-78 et. al.), either at the time of the tax sale or thereafter, may at any time file an action with the Superior Court in the county wherein said municipality is situate, demanding the right of redemption on such property be barred pursuant to the “tax sale law”, R.S. 54:5-1 et. seq.”

N.J.S.A. 54:5-104.35

Resolution by Governing Body

The governing body of any municipality may, from time to time, determine, by resolution, to foreclose any of the tax sale certificates held by it, by the summary proceedings *In Rem* provided by this act. Such resolution shall list the lands against which such proceedings shall be instituted. Such list, to be known as the "Tax Foreclosure List," shall be prepared and certified by the tax collector. It shall schedule the lands and certificates in numerical sequence, and shall contain the following information:

- (a) Schedule number.
- (b) Description of the land as it appears on the tax duplicate and in the certificate of tax sale.
- (c) Serial number, or, if no serial number, other identification of the certificate of tax sale.
- (d) Date of tax sale.
- (e) Book and page or date and instrument number of the record of the certificate in the office of the county recording officer if such certificate has been recorded at the time of the adoption of such resolution, and the prior recording of the tax certificate shall not be a prerequisite to the adoption of the resolution.
- (f) The amount of the sale as set forth in the certificate.
- (g) The amount of all tax liens accruing subsequent to the tax sale, including interest, penalties and costs.
- (h) The amount required to redeem.
- (i) The name of the person appearing as the owner of the land to be affected by the foreclosure proceedings as it appears on the last tax duplicate of the municipality, or the word "unknown" if no name appears thereon.

RESOLUTION AUTHORIZING THE SOLICITOR TO FORECLOSE CERTAIN PROPERTIES FOR DELINQUENT TAXES IN THE TOWNSHIP OF WOOLWICH, COUNTY OF GLOUCESTER, STATE OF NEW JERSEY

R-2014-150

WHEREAS, the Tax Collector of the Township of Woolwich has prepared and presented to the Township Committee of the Township of Woolwich an In Rem Foreclosure List. The list includes Schedule Numbers One through Twelve; and

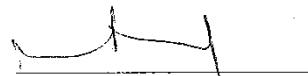
WHEREAS, N.J.S.A.54:5-104.35 provides in pertinent that the Governing Body may by Resolution, foreclose any of the tax sale certificates held by it, by the summary proceedings In Rem as provided in the In Rem Foreclosure Act [L.1948, c, 96];

NOW THEREFORE BE IT RESOLVED, by the Township Committee of the Township of Woolwich, in the County of Gloucester and the State of New Jersey that Mark Shoemaker, Esquire of Ward Shoemaker LLC, 196 Grove Avenue Suite A, West Deptford, NJ 08096 is hereby authorized to foreclose the property schedule as noted below on the In Rem Foreclosure List, a copy of which is attached hereto and made a part hereof:

Cert #	Blk. Lot	Property Name
10-8	Block 11, lot 7	Woolwich dev. Group LLC
10-7	Block 5, Lot 11.02	PMC Co. Inc.
12-00009	Block 25, Lot 3.20	William G. Phillips
12-00010	Block 34, Lot 2.03	Joseph and Karen Eliason
12-00011	Block 34, Lot 2.04	Joseph and Karen Eliason

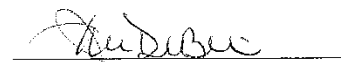
Adopted this 18th day of August, 2014

TOWNSHIP OF WOOLWICH



Samuel Maccarone, Jr. Mayor


ATTEST:



Jane DiBella, Clerk

CERTIFICATION

The foregoing resolution was duly adopted by the Township Committee of Woolwich, at a meeting held on the 18th day of August, 2014



Jane DiBella, Clerk

TAX COLLECTORS IN REM FORECLOSURE LIST

SCHEDULE NUMBER	BLOCK/LOT	CERT NUMBER	TAX SALE DATE	RECORDING BOOK/PAGE	\$ OF TAX SALE	SUBSEQUENT TO THE TAX SALE	\$ TO REDEEM	NAME OF OWNER PER LAST
1	5/6.01	08-7	11/6/2007		\$155.11		\$ 342.41	PMC CO INC 106 LOCKE AVE - NO
2	5/11.02	10-7	11/17/2010		\$771.69	\$	2,868.26	\$ 5,091.60 PMC CO INC 106 LOCKE AVE - VA
3	11/7	10-8	11/17/2010		\$7,535.77	\$24,967.43	\$48,139.67	WOOLWICH DEV GROUP LLC-211
4	11/23.07	11-003	11/17/2011	12865-240	\$1,043.81	\$	1,879.38	\$ 4,188.12 THE ENCLAVE @ STONE MEETING
5	11/23.20	10-9	11/17/2010		\$388.56	\$	2,008.12	\$ 3,329.55 THE ENCLAVE @ STONE MEETING
6	25/3.07	12-00005	12/13/2012	13414/193	\$1,873.14	\$	4,040.63	\$ 7,570.64 HIDDEN MILL ASSOC - 145 STEEPL
7	25/3.08	12-00006	12/13/2014	13414/190	\$1,753.64	\$	3,646.89	\$ 7,725.90 HIDDEN MILL ASSOC - 144 STEEPL
8	25/3.20	12-00009	12/13/2014	13414/187	\$2,043.28	\$	4,361.60	\$ 8,177.24 PHILLIPS, WILLIAM G JR - 220 MOI
9	34/2.03	12-00010	12/13/2014	13414-184	\$1,901.87	\$	4,805.48	\$ 8,503.70 ELIASEN JOSEPH & KAREN-OGDEN
10	34/2.04	12-00011	12/13/2014	13414-181	\$1,901.87	\$	4,640.24	\$ 8,305.26 ELIASEN JOSEPH & KAREN-OGDEN
11	47.02/3	09-39	10/7/2009	12128-234	\$2,194.87	\$	5,687.11	\$ 13,619.17 BLUE SPRUCE LLC -GABRIELLE CIR
12	56/2	04-4	10/28/2004		\$1,357.88	\$	13,237.02	\$ 29,039.02 KRAMER & COMETZ-102 RUSSELL

Preparing Complaint

- The format of the complaint follows. Each complaint contains a full caption. The properties are listed in numerical order by block and lot number – lowest block and lot number to highest.
- A copy of the municipal resolution authorizing the foreclosure must be attached to complaint.

- An expanded tax list must be attached to complaint. Using the tax list attached to the resolution, add 2 additional columns: [1] Estimated Amount to Redeem as of _____ (approximate date when complaint will be filed); and [2] Estimated Amount to Redeem as of _____ (date six months out).
- The tax collector is required to sign the certification page attached to the complaint.
- Approximately 1 year ago, the Foreclosure Unit requested that a Second Count for possession be added to the *In Rem* complaint.

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

<u>Attorneys for Plaintiff</u>	<u>SUPERIOR</u>	COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey)	GLOUCESTER COUNTY
)	CHANCERY DIVISION
)	
Plaintiff(s))	Docket No. F-
vs.)	
)	CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))	
ASSESSED TO: PMC COMPANY [per TSC])	COMPLAINT
PMC CO., INC. [per Deed])	
106 Locke Avenue)	[IN REM FORECLOSURE]
-----)	
BLOCK: 11 LOT: 7 (#2))	
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC)	
2111 US 322 [Erroneously typed as '211' instead of '2111' on the tax sale certificate document])	
-----)	
REMOVED (#3))	
-----)	
BLOCK: 34 LOT: 2.03 (#4))	
ASSESSED TO: ELIASSEN, Joseph F. and Karen A., h/w)	
Ogden Road)	
-----)	
BLOCK: 34 LOT: 2.04 (#4))	
ASSESSED TO: ELIASSEN, Joseph F. and Karen A., h/w)	
Ogden Road)	
-----)	
)	
<u>Defendant(s)</u>)	

Plaintiff, Township of Woolwich, A Municipal Corporation of New Jersey, having its principal place of business at 120 Village Green Drive, Woolwich Township, New Jersey 08085, for its complaint, says:

FIRST COUNT

1. By resolution(s) adopted by the Township Council of the Township of Woolwich, the governing body of said Township of Woolwich, on August 18, 2014, pursuant to R.S. 54:5-104.29 to R.S. 54:5-104.71, as amended in the Rules of this Court governing such practice and procedure, plaintiff determined to Foreclose In Rem, the tax sale certificates particularly mentioned and described in the tax foreclosure list annexed to said resolution(s), copies of which resolution(s) and tax foreclosure list(s) are annexed hereto and made part hereof.

2. Pursuant to N.J.S.A. 54:5-104.34, more than six months have expired from the date of the sale out of which each of the above mentioned tax sale certificates arose.

3. All or any portion of the general land taxes levied and assessed against the land covered by each of the above mentioned tax sale certificates for the 21 months next preceding the commencement of the action, other than those subject to payment by installments authorized by resolution adopted pursuant to R.S.54:5-65, remains unpaid.

4. Each of the tax sale certificates and the land therein described which are the subject matter of this foreclosure are listed in the tax foreclosure list annexed hereto and made a part hereof and are there designated as Schedules 1, 2, 4 and 5.

5. The name of the person or persons who, by the public records appear to be the owners of the land to be affected by this tax foreclosure proceeding, more particularly set forth in the attached tax foreclosure list, and the book and page or date and instrument number of the instrument by which such persons acquired title as set forth hereunder, opposite the respective schedule number referred to in paragraph 4 above. For further identification, there is also set forth opposite each schedule number, the identifying serial number of the certificate of tax sale, the date of recording of same in the Office of the Clerk of Gloucester County, and the instrument number or book and page number where the same is recorded and each certificate set forth herein shall be deemed a separate cause of action.

<u>SCHEDULE NUMBER</u>	<u>TAX SALE CERTIFICATE NUMBER</u>	<u>DATE RECORDED</u>	<u>BOOK AND PAGE REFERENCE</u>
1	10-7	07/09/2014	14010 - 187
2	10-8	07/09/2014	14010 - 184
3	REMOVED		
4	12-00010	01/30/2013	13414 - 184
5	12-00011	01/30/2013	13414 - 181

<u>SCHEDULE NUMBER</u>	<u>TRANSFEREE OR PURCHASER OF TITLE</u>	<u>DEED DATE</u>	<u>DATE RECORDED</u>	<u>BOOK AND PAGE REFERENCE</u>
1	PMC Co., Inc.	03/22/2007	04/03/2007	4364 - 284
2	Woolwich Development Group, LLC	04/30/2008	05/08/2008	4533 - 129
3	REMOVED			
4	Joseph F. Eliassen & Karen A. Eliassen h/w	02/06/2004 12/30/2009	02/11/2004 01/25/2010	3728 - 262 4737 - 278
5	Joseph F. Eliassen & Karen A. Eliassen h/w	02/06/2004 12/30/2009	02/11/2004 01/25/2010	3728 - 262 4737 - 290

WHEREFORE, Plaintiff demands Judgment:

(a) That notice of foreclosure in the form prescribed by said statute and the rules of this Court be published once in a newspaper circulating in the municipality and that any person desiring to protect a right, title interest in the above described lands or any parcel thereof, by redemption, or to protect a right, title interest in the above described lands or any parcel thereof, by redemption, or to contest plaintiff's right to foreclose must do so by paying the amount required to redeem, plus interest to the date of redemption, and such costs, as the Court may allow prior to the entry of a Judgment herein, or by filing and serving an answer to this complaint setting forth defendant's defense within 45 days after the date of publication.

(b) That in the event of failure to redeem or answer by any person having the right to redeem or answer, such person shall be forever barred and foreclosed of all his right, title and interest and equity of the redemption of the lands and premises herein above described.

(c) That a Judgment be entered by this Court giving full and complete relief in accordance with the purposes and provisions of the aforesaid act, and in accordance with any other statutory authority and with the practice of the Court, to bar the right of redemption and to foreclose all prior or subsequent alienations and descents of the land aforesaid and encumbrances thereon, and to Order and Adjudge an absolute and indefeasible estate of inheritance in fee simple in the lands herein above described to be vested in the plaintiff.

SECOND COUNT

1. By virtue of the entry of judgment in Count 1, Plaintiff is entitled to possession of premises located in the Township of Mine Hill, County of Morris, and State of New Jersey, more particularly described in paragraph 2 of the First Count. Said claims are joined in one action pursuant to R.4:27-2.

2. Defendants have at all times since that date deprived the plaintiff of possession of said premises.

WHEREFORE, Plaintiff, or its assigns, demands Judgment:

(a) That the said defendants and all persons claiming by, through, or under them be directed to deliver up to the plaintiff the possession of the said lands and premises, together with all deeds, papers, and writings in their custody and power relating to or concerning the said lands and premises or any part thereof.

(b) For costs.

GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
Attorneys for Plaintiff

BY _____
KEITH A. BONCHI

DATED: March 20, 2017

CERTIFICATION

I, KIM M. JAWORSKI, Tax Collector, hereby certify that the attached is a list of tax sale certificates held by the Township of Woolwich, and the lands affected by said certificates, together with the amounts due, to December 1, 2015 and June 1, 2016, on said tax sale certificates and for subsequent municipal liens, with interest, penalties, and costs, including the amount to redeem, as appears on the records of the tax collector's office, and the ownership of said lands as appears on the last tax duplicate of the Township of Woolwich.

I further certify that more than six (6) months has expired from the date of the tax sales out of which each of said certificates arose, and that no part of any general land taxes, levied and assessed for the 21 months next preceding the date hereof against the land covered by each of said certificates, has been paid.

DATED: November , 2015

KIM M. JAWORSKI, CTC
TOWNSHIP OF WOOLWICH

STATE OF NEW JERSEY)
) SS.
COUNTY OF GLOUCESTER)

KIM M. JAWORSKI, of full age, being duly sworn according to law, deposes and says:

1. I am the Tax Collector of the Township of Woolwich, the plaintiff herein.
2. I have read the foregoing complaint and know the contents thereof.
3. The tax foreclosure list contained in said complaint was prepared by me or under my supervision.
4. The matters and things stated in said complaint which were taken from the records of my office, are true, and the other matters therein stated are true to the best of my knowledge, information and belief.

KIM M. JAWORSKI, CTC
TOWNSHIP OF WOOLWICH

Sworn to and subscribed
before me this day
of November, 2015

A Notary Public of New Jersey

-5- (attach resolution next)

-6- (attach tax foreclosure list next)

CERTIFICATION PURSUANT TO RULE 4:5-1

Plaintiff, upon information and belief, is not aware of any pending or contemplated action. Further, upon information and belief, plaintiff is not aware of any other party who should be joined in this action.

GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
Attorneys for Plaintiff

BY

KEITH A. BONCHI

DATED: November 16, 2016

-7-

CERTIFICATION

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).

GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
Attorneys for Plaintiff

BY

KEITH A. BONCHI

DATED: March 20, 2017

-8-

CERTIFICATION

I, the undersigned, an attorney at law of the State of New Jersey, partner of the law firm of Goldenberg, Mackler, Sayegh, Mintz, Pfeffer, Bonchi & Gill, attorneys for the plaintiff in the within action, and the person actually entrusted with the conduct and management of the case.

I aver that prior to the filing of this tax foreclosure complaint, I have received and reviewed a title search of the public record for the purpose of identifying any lienholder or other persons and entities with an interest in the property that is subject to the within foreclosure dated October 16, 2015.

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.

GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
Attorneys for Plaintiff

BY _____
KEITH A. BONCHI

DATED: March 20, 2017

UNLESS YOU NOTIFY US IN WRITING WITHIN THIRTY [30] DAYS AFTER RECEIPT OF THIS LETTER THAT THE DEBT, OR ANY PART OF IT, IS DISPUTED, WE WILL ASSUME THAT THE DEBT IS VALID. IF YOU DO NOTIFY US OF A DISPUTE, WE WILL OBTAIN VERIFICATION OF THE DEBT AND MAIL IT TO YOU. ALSO UPON YOUR WRITTEN REQUEST WITHIN THIRTY [30] DAYS, WE WILL PROVIDE YOU WITH THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR IF DIFFERENT FROM THE CURRENT CREDITOR.

THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Complaint is filed on eCourts

54:5-104.41

“The plaintiff shall file the complaint in the office of the municipal tax collector, the county recording officer and the Attorney General of the State of New Jersey.”

This requires an Acknowledgment of Filing by the Tax Collector, County Recording Officer and Attorney General.

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

<u>Attorneys for Plaintiff</u>	<u>SUPERIOR COURT OF NEW JERSEY</u>)
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey)	GLOUCESTER COUNTY CHANCERY DIVISION
)	
	Plaintiff(s)) Docket No. F-038500-15
vs.)	
)	CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))	
ASSESSED TO: PMC COMPANY [per TSC])	ACKNOWLEDGMENT OF
PMC CO., INC. [per Deed])	FILING BY ATTORNEY
106 Locke Avenue)	GENERAL
-----)	
BLOCK: 11 LOT: 7 (#2))	
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC)	
2111 US 322 [Erroneously typed as '2111' instead of '2111' on the tax sale certificate document])	
-----)	
REMOVED (#3))	
-----)	
BLOCK: 34 LOT: 2.03 (#4))	
ASSESSED TO: ELIASSEN, Joseph F. and Karen A., h/w)	
Ogden Road)	
-----)	
BLOCK: 34 LOT: 2.04 (#4))	
ASSESSED TO: ELIASSEN, Joseph F. and Karen A., h/w)	
Ogden Road)	
-----)	
)	
	Defendant(s))

On this _____ day of December, 2015, a copy of the complaint entitled as above, certified to be a true copy by Keith A. Bonchi, Esquire, Attorney for the Plaintiff, was received for filing, and remains on file in my office.

 ATTORNEY GENERAL

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

Attorneys for Plaintiff	SUPERIOR	COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal)	GLOUCESTER COUNTY
Corporation of New Jersey)	CHANCERY DIVISION
)	
	Plaintiff(s)) Docket No. F-038500-15
vs.)	
)	CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))	
ASSESSED TO: PMC COMPANY [per TSC])	ACKNOWLEDGMENT OF
PMC CO., INC. [per Decd])	FILING BY TAX
106 Locke Avenue)	COLLECTOR
-----)	
BLOCK: 11 LOT: 7 (#2))	
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)	
LLC)	
2111 US 322 [Erroneously typed as '211')	
instead of '2111' on the tax sale)	
certificate document])	
-----)	
REMOVED	(#3))
-----)	
BLOCK: 34 LOT: 2.03 (#4))	
ASSESSED TO: ELIASSEN, Joseph F. and Karen)	
A., h/w)	
Ogden Road)	
-----)	
BLOCK: 34 LOT: 2.04 (#4))	
ASSESSED TO: ELIASSEN, Joseph F. and Karen)	
A., h/w)	
Ogden Road)	
-----)	
)	
	Defendant(s))

On this _____ day of December, 2015, a copy of the complaint entitled as above, certified to be a true copy by Keith A. Bonchi, Esquire, Attorney for the Plaintiff, was received for filing, and remains on file in my office.

 KIM M. JAWORSKI, CTC
 TOWNSHIP OF WOOLWICH

N.J.S.A. 54:5-104.44

“Upon the filing of such copy of the complaint, the county recording officer shall forthwith cause the action to be indexed in the name of all persons appearing in the tax foreclosure list and the complaint in the same index used for notices of Lis Pendens, and the filing of said complaint shall be noted in the margin of the record of each certificate of tax sale referred to in said complaint.”

This is the NOTICE OF LIS PENDENS to the world.

Preparing Service List

- As soon as the searches are received, and the complaint filed, inquiry should commence to assemble the service list for each schedule.
- The notice should be mailed to the property owner at the [1] property address; [2] address in the deed; [3] address according to the tax office records.

SCHEDULE 1

RE: BLOCK 5 - LOT 11.02 / 106 LOCKE AVENUE

ASSESSED OWNER: PMC COMPANY [per TSC]

PMC CO., INC. [per Deed]

PMC COMPANY/PMC CO., INC. [Assessed Owner]
106 Locke Avenue [Property Addresss]
Woolwich Township, NJ 08085
VACANT LAND / NO MAIL DELIVERY

OWNER/OCCUPANT/TENANT
106 Locke Avenue [Property Addresss]
Woolwich Township, NJ 08085
VACANT LAND / NO MAIL DELIVERY

STATE OF NEW JERSEY [Possible unpaid NJ
c/o Attorney General Corporation Franchise or
P.O. Box 080 other taxes]
Trenton, NJ 08625 [Judgment#DJ-257373-2012]
ORDINARY MAIL/
CERTIFIED R.R.R. _____

PMC COMPANY/PMC CO., INC. [Assessed Owner]
1880 Superfine Lane, Apt. 22 [Address per Tax Office]
Wilmington, DE 19802-4918
ORDINARY MAIL/
CERTIFIED R.R.R. _____

PMC COMPANY/PMC CO., INC. [Assessed Owner]
P.O. Box 1115 [Address per Dced]
Swedesboro, NJ 08085
ORDINARY MAIL/
CERTIFIED R.R.R. _____

PMC COMPANY/PMC CO., INC. [Assessed Owner]
200 W. Locke Avenue [Address per State records]
Swedesboro, NJ 08085
ORDINARY MAIL/
CERTIFIED R.R.R. _____

PMC COMPANY/PMC CO., INC. [Assessed Owner]
C/O Div. of Commercial Recording
P.O. Box 308
Trenton, NJ 08625
ORDINARY MAIL/
CERTIFIED R.R.R. _____

PMC COMPANY/PMC CO., INC. [Assessed Owner]
c/o Joseph G. Vasta R/A
1880 Superfine Lane, Apt. 22
Wilmington, DE 19802-4918
ORDINARY MAIL/
CERTIFIED R.R.R. _____

PMC COMPANY/PMC CO., INC.
c/o Joseph G. Vasta R/A
1107 Courses Landing Road
Pilesgrove, NJ 08098
ORDINARY MAIL/
CERTIFIED R.R.R. _____

[Assessed Owner]

PMC COMPANY/PMC CO., INC.
c/o Salvatore F. Vasta, O/O/D
1064 Courses Landing Road
Pilesgrove, NJ 08098
ORDINARY MAIL/
CERTIFIED R.R.R. _____

[Assessed Owner]

SCHEDULE 2

RE: BLOCK 11 - LOT 7 / 2111 US 322 [Erroneously typed '211' on TSC]

ASSESSED OWNER: WOOLWICH DEVELOPMENT GROUP, LLC

WOOLWICH DEVELOPMENT GROUP, LLC [Assessed Owner]
2111 US 322 [Property Address]
Woolwich Township, NJ 08085
VACANT LAND / NO MAIL DELIVERY

OWNER/OCCUPANT/TENANT
2111 US 322 [Property Address]
Woolwich Township, NJ 08085
VACANT LAND / NO MAIL DELIVERY

STATE OF NEW JERSEY [Possible unpaid NJ
c/o Attorney General Corporation Franchise or
P.O. Box 080 other taxes]
Trenton, NJ 08625
ORDINARY MAIL/
CERTIFIED R.R.R. _____

WOOLWICH DEVELOPMENT GROUP, LLC [Assessed Owner]
6 Spruce Street [Address per Tax Office]
Woolwich Township, NJ 08085 [Address per Deed]
ORDINARY MAIL/
CERTIFIED R.R.R. _____

WOOLWICH DEVELOPMENT GROUP, LLC [Assessed Owner]
c/o Joseph A. DeAngelo, Jr. R/A
6 Spruce Street
Woolwich Township, NJ 08085
ORDINARY MAIL/
CERTIFIED R.R.R. _____

WOOLWICH DEVELOPMENT GROUP, LLC [Assessed Owner]
C/O Div. of Commercial Recording
P.O. Box 308
Trenton, NJ 08625
ORDINARY MAIL/
CERTIFIED R.R.R. _____

KATINA VELAHOS [Judgment#J-078074-2009]
49 Ocean Drive W.
Brigantine, NJ 08203
ORDINARY MAIL/
CERTIFIED R.R.R. _____

KATINA VELAHOS [Judgment#J-078074-2009]
90 S. Orchard Street
Gibbstown, NJ 08027
ORDINARY MAIL/
CERTIFIED R.R.R. _____

ANTHONY VELAHOS [Judgment#J-078074-2009]
49 Ocean Drive W.
Brigantine, NJ 08203
ORDINARY MAIL/
CERTIFIED R.R.R. _____

ANTHONY VELAHOS [Judgment#J-078074-2009]
90 S. Orchard Street
Gibbstown, NJ 08027
ORDINARY MAIL/
CERTIFIED R.R.R. _____

KATINA VELAHOS [Judgment#J-078074-2009]
49 Ocean Drive W.
Brigantine, NJ 08203
ORDINARY MAIL/
CERTIFIED R.R.R. _____

KATINA VELAHOS & ANTHONY VELAHOS [Judgment#J-078074-2009]
c/o Ward Shoemaker LLC
196 Grove Avenue, Suite A
West Deptford, NJ 08086
ORDINARY MAIL/
CERTIFIED R.R.R. _____

ARTEMIS KOCH [Judgment#J-078074-2009]
414 Haverford Avcnue
Narberth, PA 19072
ORDINARY MAIL/
CERTIFIED R.R.R. _____

ARTEMIS KOCH [Judgment#J-078074-2009]
300 16th Strcct S
Brigantine, NJ 08203
ORDINARY MAIL/
CERTIFIED R.R.R. _____

WILLIAM KOCH [Judgment#J-078074-2009]
414 Haverford Avenue
Narberth, PA 19072
ORDINARY MAIL/
CERTIFIED R.R.R. _____

WILLIAM KOCH [Judgment#J-078074-2009]
300 16th Street S
Brigantine, NJ 08203
ORDINARY MAIL/
CERTIFIED R.R.R. _____

ARTEMIS KOCH & WILLIAM KOCH [Judgment#J-078074-2009]
c/o Ward Shoemaker LLC
196 Grove Avenue, Suite A
West Deptford, NJ 08086
ORDINARY MAIL/
CERTIFIED R.R.R. _____

REUVEN OANANO [Judgment#J-217881-2009]
c/o Clerk, Superior Court of NJ
P.O. Box 971
Trenton, NJ 08625
ORDINARY MAIL/
CERTIFIED R.R.R. _____

REUVEN OANANO c/o Steven C. Forman, Esquire 540 N. Route 73 Box 331 W. Berlin, NJ 08091 ORDINARY MAIL/ CERTIFIED R.R.R. _____	[Judgment#J-217881-2009]
JOSEPH A. DeANGELO, JR. 6 Spruce Street Woolwich Township, NJ 08085 ORDINARY MAIL/ CERTIFIED R.R.R. _____	[Principal] [Mortgage-Bk.11501/pg.60]
TIM McKINNEY a/k/a TIMOTHY B. McKINNEY, MD 10 Baltusrol Terrace Moorestown, NJ 08057 ORDINARY MAIL/ CERTIFIED R.R.R. _____	[Mortgage-Bk.11501/pg.60] [LisPendens-Bk.00038080]
TIM McKINNEY a/k/a TIMOTHY B. McKINNEY, MD c/o Thomas A. McKinney, Esquire 1107 Goffle Road Hawthorne, NJ 07507 ORDINARY MAIL/ CERTIFIED R.R.R. _____	[Mortgage-Bk.11501/pg.60] [LisPendens-Bk.00038080]
TIM McKINNEY a/k/a TIMOTHY B. McKINNEY, MD 3021 NE 23 RD Court Fort Lauderdale, FL 33305 ORDINARY MAIL/ CERTIFIED R.R.R. _____	[Mortgage-Bk.11501/pg.60] [LisPendens-Bk.00038080]
TIM McKINNEY a/k/a TIMOTHY B. McKINNEY, MD 212 Melody Lane Lavallette, NJ 08735 ORDINARY MAIL/ CERTIFIED R.R.R. _____	[Mortgage-Bk.11501/pg.60] [LisPendens-Bk.00038080]
ROBERT CAIONE 25 Hunters Creek Circle Mullica Hill, NJ 08062-2635 ORDINARY MAIL/ CERTIFIED R.R.R. _____	[Mortgage-Bk.12132/pg.64] [Mortgage-Bk.12132/pg.65]
DRESDNER ROBIN ENVIRONMENTAL MANAGEMENT, INC./ PERKS REUTTER DIV. 4300 Haddonfield Road, Suite 115 Pennsauken, NJ 08109 ORDINARY MAIL/ CERTIFIED R.R.R. _____	[Construction Lien Claim- Bk.31/pg.85]

SCHEDULE 6 / ADDITIONAL PARTIES / ALL PROPERTIES

STATE OF NEW JERSEY
c/o Attorney General
P.O. Box 080
Trenton, NJ 08625
ORDINARY MAIL/
CERTIFIED R.R.R. _____

CONECTIV POWER SERVICES
Attn: Manager of R/E & R/W
5100 Harding Highway, Suite 399
Mays Landing, NJ 08330
ORDINARY MAIL/
CERTIFIED R.R.R. _____

SOUTH JERSEY GAS CO.
Attn: Engineering Manager
1 South Jersey Plaza
Hammonton, NJ 08037
ORDINARY MAIL/
CERTIFIED R.R.R. _____

PUBLIC SERVICE ELECTRIC & GAS CO.
Attn: Manager-Corporate Properties
80 Park Plaza, T6B
Newark, NJ 07012
ORDINARY MAIL/
CERTIFIED R.R.R. _____

NJ STATE DEPT OF TRANSPORTATION
Attn: Planning Division
P.O. Box 600
Trenton, NJ 08625
ORDINARY MAIL/
CERTIFIED R.R.R. _____

GLOUCESTER COUNTY DEPT. OF PUBLIC WORKS
Attn: Planning Division
Route 47/Delsca Drive
Clayton, NJ 08312
ORDINARY MAIL/
CERTIFIED R.R.R. _____

COMCAST CABLE CO.
Attn: James Parkinson
1846 N. W. Boulevard
Vincland, NJ 08360
ORDINARY MAIL/
CERTIFIED R.R.R. _____

WASTE MANAGEMENT
P.O. Box 13648
Philadelphia, PA 19101
ORDINARY MAIL/
CERTIFIED R.R.R. _____

- Note: If the property being foreclosed is vacant land, notice need not be mailed to the property, but it should be noted in the tax list that it is vacant land and there is no mail delivery.
- Notice should also be mailed to any other address for the property owner ascertained through diligent inquiry.

- If the property has a structure, it is suggested that a notice addressed to 'Owner/Occupant/Tenant' at the property address also be sent.
- Notice must be mailed to all others holding any type of lien against the premises i.e. mortgage, prior tax sale certificate, judgment, lis pendens, etc.

- If, through the searches or inquiry, it is found that the property owner is deceased, diligent inquiry is required to locate whomever inherited the property. There may be a filed will showing the beneficiaries or the owner may have died intestate in which case, inquiry is needed to locate any and all intestate heirs. This may take considerable effort and time to accomplish.
- If the property owner is an entity, the State of New Jersey should be given notice for possible unpaid NJ corporation franchise or other taxes.

- If anyone in title is deceased, the State of New Jersey should be given notice for possible unpaid NJ Transfer Inheritance Taxes and/or NJ Estate Taxes.
- There are situations when an owner is deceased, but no beneficiaries or heirs can be located. In those situations, Unknown Owners/Unknown Claimants should also be noticed. In that case, the State of New Jersey should also be given notice for possible escheat.

- Keep in mind that if the foreclosure searches show any type of federal lien, whether it be a mortgage, judgment, IRS lien, that property cannot be foreclosed through the *In Rem* process. It can, however, be foreclosed through an *In Personam* action.

- Keep in mind that a Certification of Inquiry is not required to be filed in an *In Rem* action, but complete inquiry material should be compiled and maintained. The question of inquiry usually comes up following completion of the foreclosure and the resale of the property or in a motion to vacate final judgment. Be ready to support to whom notice was given, the addresses of service. Title companies, on a resale, often question the exclusion of judgment creditors. Be in a position to provide basis for judgment eliminations.

- There are numerous websites available to locate the current name and address of any bank, savings and loan, or other lending institution.
- There are websites available to locate the current name and address of any insurance company.

- If an estate is located for a deceased person, where an executor or administrator is appointed, notice should be given to the executor or administrator in care of the Surrogate's Office of the county where the estate is filed. That is in addition to the personal address for that executor or administrator.
- Keep in mind that more notice is better than not enough notice.
- Effort is required.

- Preparation of the service schedules should be worked on as soon as the complaint is filed while waiting for the search continuation following filing the complaint in the county of venue. This is often very time consuming.
- Do not arrange for publication until your service lists are completed and envelopes prepared.
- A separate service list should be prepared for each schedule.
- In addition, the last service list should be a list of 'Additional Parties/All Properties'. That list would include the State of New Jersey, and any and all companies that provide services to properties in that municipality – i.e. water,sewer.trash etc.

Posting, Mailing and Publication

- When the search continuations are received through the date the complaint is filed in the county, if there are any additional liens that are shown, those additional liens should be added to the appropriate service schedules previously prepared.

- After the search continuations are received and all service schedules are prepared and expanded, if necessary, the notice for the newspaper should be prepared. If working with an abstracting company, that company should review the form of notice before it is submitted to the newspaper.

NOTICE OF IN REM FORECLOSURE OF TAX LIEN TITLES
SUPERIOR COURT OF NEW JERSEY
GLOUCESTER COUNTY
CHANCERY DIVISION
DOCKET NO. F-038500-15

TOWNSHIP OF WOOLWICH
A Municipal Corporation of the State of New Jersey

TAKE NOTICE that an action In Rem has been commenced in the Superior Court of New Jersey, by the filing of a complaint on November 30, 2015 to foreclose and forever bar any and all rights of redemption of the parcels of land described in the Tax Foreclosure List below from plaintiff's tax lien titles.

1. The action is brought against the land only, and no personal judgment may be entered.
2. Any person desiring to protect a right, title or interest in the described land and/or any parcel thereof by redemption or to contest plaintiff's right to foreclose, must do so by paying the amount required to redeem as set forth below, plus interest to the date of redemption, and such costs as the court may allow, prior to the entry of judgment therein, or by filing an answer to the complaint setting forth the defendant's defense, within forty-five (45) days after the date of publication of this notice.
3. In the event of failure to redeem or answer by any person having the right to redeem or answer, such person shall be forever barred and foreclosed of all his right, title and interest and equity of redemption in and to the parcels of land described in the following tax foreclosure list.
4. Following is a copy of the tax foreclosure list showing the lands against which this action is brought.

TAX FORECLOSURE LIST

KEITH A. BONCHI, ESQUIRE
GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
Attorneys for Plaintiff
660 New Road, Suite 1A
Northfield, NJ 08225

DATED: February 8, 2016

- When you are ready to publish, select a publication date at least 7 days out. Email the notice to the paper [must be a newspaper circulating in the municipality where the properties are located]. It is highly suggested that you request a proof prior to publication for your review and approval.
- Within 7 days after publication, a copy of the notice should be mailed by certified mail, return receipt requested, and by ordinary mail to each listing in each service list. [It is our procedure to mail on the same date as publication.]

- Within 15 days of the publication date, a copy of the notice should be ‘posted’ in the Office of the Tax Collector, in the Office of the County Clerk/Register, in 3 conspicuous places in the municipality, and on each property where ‘Unknown Owners/Unknown Claimants’ are listed. [It is our procedure, to have a notice posted on every property being foreclosed.]
- Following publication, obtain an Affidavit (Proof) of Publication from the newspaper to submit with your final judgment package.

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

Attorneys for Plaintiff) SUPERIOR COURT OF NEW JERSEY
 TOWNSHIP OF WOOLWICH, A Municipal) GLOUCESTER COUNTY
 Corporation of New Jersey) CHANCERY DIVISION
)
 Plaintiff(s)) Docket No. F-038500-15
 vs.)
) CIVIL ACTION
 BLOCK: 5 LOT: 11.02 (#1)) CERTIFICATION
 ASSESSED TO: PMC COMPANY [per TSC]) OF POSTING
 PMC CO., INC. [per Deed])
 106 Locke Avenue)
 -----)
 BLOCK: 11 LOT: 7 (#2))
 ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
 LLC)
 2111 US 322 [Erroneously typed as '211'
 instead of '2111' on the tax sale
 certificate document])
 -----)
 REMOVED (#3))
 -----)
 REDEEMED (#4))
 -----)
 REDEEMED (#5))
 -----)
 Defendant(s))

_____, of full age, by way of certification
 in accordance with R.1:4-4(b), says:

1. I am an agent of the plaintiff in the above entitled action.
2. On February _____, 2016, I posted a copy of the Notice of In Rem Tax Foreclosure of Tax Lien Titles, dated and published on February 8, 2016, in the five locations set forth on the attached list, the same being conspicuous places within the Township of Woolwich.
3. 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 wilfully false, I am subject to punishment.

DATED: February _____, 2016

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

Attorneys for Plaintiff _____ SUPERIOR COURT OF NEW JERSEY
 TOWNSHIP OF WOOLWICH, A Municipal) GLOUCESTER COUNTY
 Corporation of New Jersey) CHANCERY DIVISION
)
 Plaintiff(s)) Docket No. F-038500-15
 vs.)
) CIVIL ACTION
 BLOCK: 5 LOT: 11.02 (#1)) CERTIFICATION OF
 ASSESSED TO: PMC COMPANY [per TSC]) POSTING IN TAX
 PMC CO., INC. [per Deed]) COLLECTOR'S OFFICE
 106 Locke Avenue)
 -----)
 BLOCK: 11 LOT: 7 (#2))
 ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
 LLC)
 2111 US 322 [Erroneously typed as '211'
 instead of '2111' on the tax sale
 certificate document])
 -----)
 REMOVED (#3))
 -----)
 REDEEMED (#4))
 -----)
 REDEEMED (#5))
 -----)
 _____ Defendant(s) _____)

KIM M. JAWORSKI, of full age, by way of certification in accordance with R.1:4-4(b), says:

1. I am the Tax Collector of the Township of Woolwich, the plaintiff in the above entitled action.
2. On February 8, 2016, I posted a copy of the Notice of In Rem Tax Foreclosure of Tax Lien Titles, dated and published on February 8, 2016, in the office of the Tax Collector, 120 Village Green Drive, Woolwich Townships, New Jersey.
3. 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 wilfully false, I am subject to punishment.

 KIM M. JAWORSKI, CTC

DATED: February 8, 2016

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

<u>Attorneys for Plaintiff</u>		<u>SUPERIOR</u>	COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey)	GLOUCESTER COUNTY)
)	CHANCERY DIVISION)
)	Docket No. F-038500-15)
Plaintiff(s)))
vs.))
)	CIVIL ACTION)
BLOCK: 5 LOT: 11.02	(#1)	CERTIFICATION OF)
ASSESSED TO: PMC COMPANY [per TSC])	POSTING IN GLOUCESTER)
PMC CO., INC. [per Decd])	COUNTY CLERK'S OFFICE)
106 Locke Avenue))
-----))
BLOCK: 11 LOT: 7	(#2))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC))
2111 US 322 [Erroneously typed as '211' instead of '2111' on the tax sale certificate document]))
-----))
REMOVED	(#3))
-----))
REDEEMED	(#4))
-----))
REDEEMED	(#5))
-----))
_____	Defendant(s))

_____, of full age, by way of certification in accordance with R.1:4-4(b), says:

1. I am an agent of the plaintiff in the above entitled action.
2. On February _____, 2016, I posted a copy of the Notice of In Rem Tax Foreclosure of Tax Lien Titles, dated and published on February 8, 2016, in the Gloucester County Clerk's Office.
3. 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 wilfully false, I am subject to punishment.

DATED: February _____, 2016

Applying for Final Judgment

- The following are required when applying for final judgment:
 1. Certification in Lieu of Affidavit with Respect to Time Periods Since Tax Sales, and as to General Land Taxes;
 2. Certification in Lieu of Affidavit re: General Land Taxes;
 3. Certification in Lieu of Affidavit re: Filing of Notice of Interested Person Pursuant to N.J.S.A. 54:5-104.48;

4. Certification with Respect to Non-Redemption;
5. Certification with Respect to Service of In Rem Foreclosure of Tax Lien Titles;
6. Request for Entry of Default;
7. Certification in Lieu of Affidavit with Respect to Non-Military Service;
8. Certification in Lieu of Affidavit of No Answer;
9. Acknowledgment of filing for Attorney General;

10. Acknowledgment of Filing by County Clerk/Register;
11. Acknowledgment of Filing by Tax Collector;
12. Certification of Posting in Tax Collector's Office;
13. Certification of Posting in County Clerk/Register's Office;
14. Certification of Posting in 3 Conspicuous Places;
15. Certification of Posting on properties being foreclosed;

16. Proof of Publication;
17. Certification of 60 Year Search;
18. Notice to Dismiss Schedules [if needed];
19. Final Judgment.

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

<u>Attorneys for Plaintiff</u>	<u>SUPERIOR</u>	COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey)	GLOUCESTER COUNTY
)	CHANCERY DIVISION
)	
)	Docket No. F-038500-15
vs.)	
)	CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))	CERTIFICATION IN LIEU
ASSESSED TO: PMC COMPANY [per TSC])	OF AFFIDAVIT WITH RESPECT
PMC CO., INC. [per Deed])	TO TIME PERIODS SINCE TAX
106 Locke Avenue)	SALES, AND AS TO
-----)	GENERAL LAND TAXES
BLOCK: 11 LOT: 7 (#2))	
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC)	
2111 US 322 [Erroneously typed as '211' instead of '2111' on the tax sale certificate document])	
-----)	
REMOVED (#3))	
-----)	
REDEEMED (#4))	
-----)	
REDEEMED (#5))	
-----)	
)	Defendant(s)

KIM M. JAWORSKI, of full age, by way of certification in accordance with R.1:4-4(b), says:

1. I am the Tax Collector of the Township of Woolwich, the plaintiff herein.
2. Said records show that with reference to each of the tax sale certificates set forth in the Tax Foreclosure List and the Complaint, the tax sales were held after the enactment of C.91, P.L. 1974; that more than six months have expired from the date of each such sale, and that no part of any general land taxes levied and assessed for the twenty-one months next preceding the date of such tax foreclosure list and the commencement of this action has been paid with respect thereto, all as appears in my Certificate in Lieu of Affidavit of Non-Redemption about to be filed herein.
3. 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 wilfully false, I am subject to punishment.

 KIM M. JAWORSKI, TAX COLLECTOR

DATED: March 20, 2017

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

Attorneys for Plaintiff	SUPERIOR	COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey)	GLOUCESTER COUNTY
)	CHANCERY DIVISION
)	
Plaintiff(s))	Docket No. F-038500-15
vs.)	
)	CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))	CERTIFICATION IN LIEU
ASSESSED TO: PMC COMPANY [per TSC])	OF AFFIDAVIT RE:
PMC CO., INC. [per Deed])	GENERAL LAND TAXES
106 Locke Avenue)	
-----)		
BLOCK: 11 LOT: 7 (#2))	
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC)	
2111 US 322 [Erroneously typed as '211' instead of '2111' on the tax sale certificate document])	
-----)		
REMOVED (#3))	
-----)		
REDEEMED (#4))	
-----)		
REDEEMED (#5))	
-----)		
Defendant(s))	

KIM M. JAWORSKI, of full age, by way of certification in accordance with R.1:4-4(b), says:

1. I am the Tax Collector of the Township of Woolwich, the plaintiff herein.

2. The sales upon which the tax sale certificates were issued as set forth in the Complaint filed in the above entitled cause were based upon general land taxes.

3. 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 wilfully false, I am subject to punishment.

 KIM M. JAWORSKI, TAX COLLECTOR

DATED: March 20, 2017

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

<u>Attorneys for Plaintiff</u>	<u>SUPERIOR</u>	COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey)	GLOUCESTER COUNTY
)	CHANCERY DIVISION
)	
Plaintiff(s))	Docket No. F-038500-15
vs.)	
)	CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))	CERTIFICATION IN LIEU
ASSESSED TO: PMC COMPANY [per TSC])	OF AFFIDAVIT RE: FILING
PMC CO., INC. [per Deed])	OF NOTICE OF INTERESTED
106 Locke Avenue)	PERSON PURSUANT TO
-----)	N.J.S.A. 54:5-104.48
BLOCK: 11 LOT: 7 (#2))	
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC)	
2111 US 322 [Erroneously typed as '211' instead of '2111' on the tax sale certificate document])	
-----)	
REMOVED (#3))	
-----)	
REDEEMED (#4))	
-----)	
REDEEMED (#5))	
-----)	
Defendant(s))	

KIM M. JAWORSKI, of full age, by way of certification in accordance with R.1:4-4(b), says:

1. I am the Tax Collector of the Township of Woolwich, the plaintiff herein.

2. According to the records on file in my office, no person owning land or holding a mortgage thereon, or any person having a lien on or claim thereon, or interest therein, has filed in my office, a notice pursuant to N.J.S.A. 54:5-104.48 with reference to any of the parcels of land more particularly described in the Complaint filed in the above cause.

3. 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 wilfully false, I am subject to punishment.

 KIM M. JAWORSKI, TAX COLLECTOR

DATED: March 20, 2017

-----)
BLOCK: 34 LOT: 2.03 (#4))
ASSESSED TO: ELIASSEN, Joseph F. and Karen)
 A., h/w)
Ogden Road)
-----)
BLOCK: 34 LOT: 2.04 (#5))
ASSESSED TO: ELIASSEN, Joseph F. and Karen)
 A., h/w)
Ogden Road)
-----)

4. According to the records of my office, I find the following properties have been removed from the certificates of tax sale and subsequent tax liens affecting the same:

NONE

5. According to the records of my office, I find that there has been no redemption of any of the properties mentioned in paragraph 2 hercof from the tax sale certificates and the subsequent tax liens affecting the same EXCEPT as set forth in paragraph 3 above; and that no part of the amounts alleged to be due in the Complaint filed in this action on account of the tax lien certificates and subsequent tax liens affecting the properties enumerated in paragraph 2 hercof have been paid EXCEPT as set forth in paragraph 3 above.

6. 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 wilfully false, I am subject to punishment.

KIM M. JAWORSKI, TAX COLLECTOR

DATED: March 20, 2017

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

Attorneys for Plaintiff	SUPERIOR	COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey)	GLOUCESTER COUNTY
)	CHANCERY DIVISION
)	
Plaintiff(s))	Docket No. F-038500-15
vs.)	
)	CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))	CERTIFICATION WITH RESPECT
ASSESSED TO: PMC COMPANY [per TSC])	TO SERVICE OF IN REM
PMC CO., INC. [per Deed])	PROECLOSURE OF TAX LIEN
106 Locke Avenuc)	TITLES
-----)	
BLOCK: 11 LOT: 7 (#2))	
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC)	
2111 US 322 [Erroneously typed as '211' instead of '2111' on the tax sale certificate document])	
-----)	
REMOVED (#3))	
-----)	
REDEEMED (#4))	
-----)	
REDEEMED (#5))	
-----)	
Defendant(s))	

SHARON A. LORENZINI, being of full age, hereby certifies:

1. I am a paralegal employed by the law firm of Goldenberg, Mackler, Sayegh, Mintz, Pfeffer, Bonchi & Gill, A Professional Corporation, Attorneys for the plaintiff in the above entitled matter.

2. I did on February 8, 2016, caused to be mailed in the U.S. Post Office, at Northfield, New Jersey, a sealed envelope with postage prepaid thereon, by regular mail, and certified mail, return receipt requested, addressed to each of the parties, which include assessed owners at addresses appearing on last municipal tax duplicate, referred to in the exhibits attached hereto containing a true copy of the attached documents.

In addition, on said date, I also mailed a copy of said notice, by regular mail, and certified mail, return receipt requested, to the Attorney General of the State of New Jersey.

3. Said parties referred to in the exhibits attached hereto include, but are not limited to (a) all persons who appear, by the abstracts of title furnished to me for the purpose of this action, as having interests of record in said lands as owners, mortgagees, judgment creditors and

lienholders, appearing of record in the Superior Court Clerk's Office or County recording officer's office as of the date the complaint filed; and (b) all persons filing notices pursuant to N.J.S.A. 54:5-104.48, if any.

4. The certified mail receipts are attached to each schedule which are part of the exhibits attached hereto and made a part hereof.

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 wilfully false, I am subject to punishment.

SHARON A. LORENZINI

Dated: March 20, 2017

NOTE:

THE SERVICE LISTS, CERTIFIED MAIL RECEIPTS AND RETURNED ENVELOPES HAVE BEEN SEPARATELY E-FILED AND THEY ARE IDENTIFIED AS:

PROOF OF MAILING #1

KEITH A. BONCHI, ESQUIRE - KAB032321983
GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
660 New Road, Suite 1-A
Northfield, NJ 08225
(609) 646-0222

Attorneys for Plaintiff) SUPERIOR COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal) GLOUCESTER COUNTY
Corporation of New Jersey) CHANCERY DIVISION
)
Plaintiff(s)) Docket No. F-038500-15
vs.)
) CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1)) REQUEST FOR ENTRY
ASSESSED TO: PMC COMPANY [per TSC]) OF DEFAULT
PMC CO., INC. [per Decd])
106 Locke Avenue)
-----)
BLOCK: 11 LOT: 7 (#2))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
LLC)
2111 US 322 [Erroneously typed as '211')
instead of '2111' on the tax sale)
certificate document])
-----)
REMOVED (#3))
-----)
REDEEMED (#4))
-----)
REDEEMED (#5))
-----)
Defendant(s))

TO: THE CLERK OF THE SUPERIOR COURT OF NEW JERSEY:

YOU WILL PLEASE enter a default herein for the failure of any person to answer as provided by the In Rem Tax Foreclosure Act (1948) N.J.S.A. 54:5-104.29, et seq., and by the Rules Governing the Courts of the State of New Jersey.

GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
Attorneys for Plaintiff

BY _____
KEITH A. BONCHI

March 31, 2016

SCHEDULE 1 / RE: BLOCK 5 - LOT 11.02 / 106 LOCKE AVENUE

ASSESSED OWNER: PMC COMPANY [per TSC]

PMC CO., INC. [per Deed]

PMC COMPANY/PMC CO., INC.
106 Locke Avenue
Woolwich Township, NJ 08085

OWNER/OCCUPANT/TENANT
106 Locke Avenue
Woolwich Township, NJ 08085

STATE OF NEW JERSEY
c/o Attorney General
P.O. Box 080
Trenton, NJ 08625

PMC COMPANY/PMC CO., INC.
1880 Superfine Lane, Apt. 22
Wilmington, DE 19802-4918

PMC COMPANY/PMC CO., INC.
P.O. Box 1115
Swedesboro, NJ 08085

PMC COMPANY/PMC CO., INC.
200 W. Locke Avenue
Swedesboro, NJ 08085

PMC COMPANY/PMC CO., INC.
C/O Div. of Commercial Recording
P.O. Box 308
Trenton, NJ 08625

PMC COMPANY/PMC CO., INC.
c/o Joseph G. Vasta R/A
1880 Superfine Lane, Apt. 22
Wilmington, DE 19802-4918

PMC COMPANY/PMC CO., INC.
c/o Joseph G. Vasta R/A
1107 Courses Landing Road
Pilesgrove, NJ 08098

PMC COMPANY/PMC CO., INC.
c/o Salvatore F. Vasta, O/O/D
1064 Courses Landing Road
Pilesgrove, NJ 08098

SCHEDULE 2 / RE: BLOCK 11 - LOT 7 / 2111 US 322 [Erroneously typed '211' on TSC]

ASSESSED OWNER: WOOLWICH DEVELOPMENT GROUP, LLC

WOOLWICH DEVELOPMENT GROUP, LLC

2111 US 322

Woolwich Township, NJ 08085

OWNER/OCCUPANT/TENANT

2111 US 322

Woolwich Township, NJ 08085

STATE OF NEW JERSEY

c/o Attorney General

P.O. Box 080

Trenton, NJ 08625

WOOLWICH DEVELOPMENT GROUP, LLC

6 Spruce Street

Woolwich Township, NJ 08085

WOOLWICH DEVELOPMENT GROUP, LLC

c/o Joseph A. DeAngelo, Jr. R/A

6 Spruce Street

Woolwich Township, NJ 08085

WOOLWICH DEVELOPMENT GROUP, LLC

C/O Div. of Commercial Recording

P.O. Box 308

Trenton, NJ 08625

KATINA VELAHOS

49 Ocean Drive W.

Brigantine, NJ 08203

KATINA VELAHOS

90 S. Orchard Street

Gibbstown, NJ 08027

ANTHONY VELAHOS

49 Ocean Drive W.

Brigantine, NJ 08203

ANTHONY VELAHOS

90 S. Orchard Street

Gibbstown, NJ 08027

KATINA VELAHOS

49 Ocean Drive W.

Brigantine, NJ 08203

KATINA VELAHOS & ANTHONY VELAHOS
c/o Ward Shoemaker LLC
196 Grove Avenue, Suite A
West Deptford, NJ 08086

ARTEMIS KOCH
414 Haverford Avenue
Narberth, PA 19072

ARTEMIS KOCH
300 16th Street S
Brigantine, NJ 08203

WILLIAM KOCH
414 Haverford Avenue
Narberth, PA 19072

WILLIAM KOCH
300 16th Street S
Brigantine, NJ 08203

ARTEMIS KOCH & WILLIAM KOCH
c/o Ward Shoemaker LLC
196 Grove Avenue, Suite A
West Deptford, NJ 08086

REUVEN OANANO
c/o Clerk, Superior Court of NJ
P.O. Box 971
Trenton, NJ 08625

REUVEN OANANO
c/o Steven C. Forman, Esquire
540 N. Route 73
Box 331
W. Berlin, NJ 08091

JOSEPH A. DeANGELO, JR.
6 Spruce Street
Woolwich Township, NJ 08085

TIM McKINNEY a/k/a TIMOTHY B. McKINNEY, MD
10 Baltusrol Terrace
Moorestown, NJ 08057

TIM McKINNEY a/k/a TIMOTHY B. McKINNEY, MD
c/o Thomas A. McKinney, Esquire
1107 Goffle Road
Hawthorne, NJ 07507

TIM McKINNEY a/k/a TIMOTHY B. McKINNEY, MD
3021 NE 23RD Court
Fort Lauderdale, FL 33305

TIM McKINNEY a/k/a TIMOTHY B. McKINNEY, MD
212 Melody Lane
Lavallette, NJ 08735

ROBERT CAIONE
25 Hunters Creek Circle
Mullica Hill, NJ 08062-2635

DRESDNER ROBIN ENVIRONMENTAL
MANAGEMENT, INC./ PERKS REUTTER DIV.
4300 Haddonfield Road, Suite 115
Pennsauken, NJ 08109

SCHEDULE 6 / ADDITIONAL PARTIES / ALL PROPERTIES

STATE OF NEW JERSEY
c/o Attorney General
P.O. Box 080
Trenton, NJ 08625

CONNECTIV POWER SERVICES
Attn: Manager of R/E & R/W
5100 Harding Highway, Suite 399
Mays Landing, NJ 08330

SOUTH JERSEY GAS CO.
Attn: Engineering Manager
1 South Jersey Plaza
Hammonton, NJ 08037

PUBLIC SERVICE ELECTRIC & GAS CO.
Attn: Manager-Corporate Properties
80 Park Plaza, T6B
Newark, NJ 07012

NJ STATE DEPT OF TRANSPORTATION
Attn: Planning Division
P.O. Box 600
Trenton, NJ 08625

GLOUCESTER COUNTY DEPT. OF PUBLIC WORKS
Attn: Planning Division
Route 47/Delsea Drive
Clayton, NJ 08312

COMCAST CABLE CO.
Attn: James Parkinson
1846 N. W. Boulevard
Vineland, NJ 08360

WASTE MANAGEMENT
P.O. Box 13648
Philadelphia, PA 19101

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

<u>Attorneys for Plaintiff</u>		<u>SUPERIOR</u>	COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey)	GLOUCESTER COUNTY)
)	CHANCERY DIVISION)
)	Docket No. F-038500-15)
Plaintiff(s)))
vs.))
)	CIVIL ACTION)
BLOCK: 5 LOT: 11.02 (#1))	CERTIFICATION IN LIEU)
ASSESSED TO: PMC COMPANY [per TSC])	OF AFFIDAVIT WITH RESPECT)
PMC CO., INC. [per Deed])	TO NON-MILITARY SERVICE)
106 Locke Avenue))
-----))
BLOCK: 11 LOT: 7 (#2)))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC))
2111 US 322 [Erroneously typed as '211' instead of '2111' on the tax sale certificate document]))
-----))
REMOVED (#3)))
-----))
REDEEMED (#4)))
-----))
REDEEMED (#5)))
-----))
)	Defendant(s))

KEITH A. BONCHI, being of full age, hereby certifies:

1. I am a partner of the law firm of Goldenberg, Mackler, Sayegh, Mintz, Pfeiffer, Bonchi & Gill, A Professional Corporation, Attorneys for the plaintiff in the above entitled matter, and I am the person actually entrusted with the conduct and management of this cause.
2. The complaint herein was filed in this action on November 30, 2015. Publication of notice of In Rem foreclosure of tax lien titles, pursuant thereto was had in the South Jersey Times on February 8, 2016. Said notice was posted as required by the Rules on February 8, 2016 and service of notice of In Rem foreclosure of tax lien titles was made by mailing the same by regular mail, and certified mail, return receipt requested, to each person whose name appears on the tax foreclosure list at his last known address as it appears on the last municipal tax duplicate, all in accordance with the statute in such case made and provided and the Rules Governing the Courts of the State of New Jersey, as well as to the other persons mentioned in the notice who have, or may claim to have an interest in the lands described in the said tax foreclosure list.
3. Notwithstanding the filing of said Complaint, the publication, posting and mailing as aforesaid, no information has come to my attention wherefrom I could determine that any of the assessed owners, as appears from

the caption of the Complaint filed herein, nor the record owners of the lands described therein as set forth in the Complaint, nor anyone claiming by, through or for any of them, nor any of the other persons mentioned in said notice, were in the military service of the United States or any of its allies.

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

KEITH A. BONCHI

Dated: March 31, 2016

KEITH A. BONCHI, ESQUIRE - KAB032321983
GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
660 New Road, Suite 1-A
Northfield, NJ 08225
(609) 646-0222

Attorneys for Plaintiff) SUPERIOR COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal) GLOUCESTER COUNTY
Corporation of New Jersey) CHANCERY DIVISION
)
Plaintiff(s)) Docket No. F-038500-15
vs.)
) CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))
ASSESSED TO: PMC COMPANY [per TSC]) CERTIFICATION IN LIEU
PMC CO., INC. [per Deed]) OF AFFIDAVIT OF NO
106 Locke Avenue) ANSWER
-----)
BLOCK: 11 LOT: 7 (#2))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
LLC)
2111 US 322 [Erroneously typed as '211'
instead of '2111' on the tax sale
certificate document])
-----)
REMOVED (#3))
-----)
REDEEMED (#4))
-----)
REDEEMED (#5))
-----)
Defendant(s))

KEITH A. BONCHI, being of full age, hereby certifies:

1. I am a partner of the law firm of Goldenberg, Mackler, Sayegh, Mintz, Pfeffer, Bonchi & Gill, A Professional Corporation, Attorneys for the plaintiff in the above entitled matter, and I am the person actually entrusted with the conduct and management of this cause.
2. Publication, posting and mailing in this action, as provided by the Statutes and the Rules Governing the Courts of New Jersey, were made as appears by the Proof of Publication and Affidavit, Certifications of Posting; and Certification of Mailing in this cause.
3. The time within which an answer may be filed has expired and no answer has been filed.
4. The time for filing an answer has not been extended.

the caption of the Complaint filed herein, nor the record owners of the lands described therein as set forth in the Complaint, nor anyone claiming by, through or for any of them, nor any of the other persons mentioned in said notice, were in the military service of the United States or any of its allies.

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

KEITH A. BONCHI

Dated: March 31, 2016

KEITH A. BONCHI, ESQUIRE - KAB032321983
GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
660 New Road, Suite 1-A
Northfield, NJ 08225
(609) 646-0222

Attorneys for Plaintiff) SUPERIOR COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal) GLOUCESTER COUNTY
Corporation of New Jersey) CHANCERY DIVISION
)
Plaintiff(s)) Docket No. F-038500-15
)
vs.)
) CIVIL ACTION
)
BLOCK: 5 LOT: 11.02 (#1))
ASSESSED TO: PMC COMPANY [per TSC]) CERTIFICATION AS TO
PMC CO., INC. [per Deed]) 60 YEAR SEARCH
106 Locke Avenue)
-----)
BLOCK: 11 LOT: 7 (#2))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
LLC)
2111 US 322 [Erroneously typed as '211')
instead of '2111' on the tax sale)
certificate document])
-----)
REMOVED (#3))
-----)
BLOCK: 34 LOT: 2.03 (#4))
ASSESSED TO: ELIASSEN, Joseph F. and Karen)
A., h/w)
Ogden Road)
-----)
BLOCK: 34 LOT: 2.04 (#5))
ASSESSED TO: ELIASSEN, Joseph F. and Karen)
A., h/w)
Ogden Road)
-----)
Defendant(s))

CYNTHIA M. CARLAMERE, of full age, by way of certification in
accordance with R.1:4-4(b), says:

1. I am the Executive Vice-President of Prcsidential Title Agency,
Inc., having offices at 1546 Blackwood-Clementon Road, Blackwood, New Jersey
08012.

2. A search has been made by Prcsidential Title Agency, Inc.
to the premises described in the complaint for a period of sixty (60) years
immediately prior to the commencement of this action. The only conveyances
disclosed by the search are the deeds described in the complaint filed herein,
and the only liens and encumbrances upon the premises were those set forth in the
complaint. For the last sixty (60) years, searches do not disclose the name of a
person who it is alleged or claimed, owns the same or part thereof, or some
interest therein, or holds a lien or encumbrance thereon, other than the persons
and other defendants set forth in the complaint.

3. 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 wilfully false, I am subject to punishment.

CYNTHIA M. CARLAMERE

DATED: March 20, 2017

KEITH A. BONCHI, ESQUIRE - KAB032321983
GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
660 New Road, Suite 1-A
Northfield, NJ 08225
(609) 646-0222

Attorneys for Plaintiff _____ SUPERIOR COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey) GLOUCESTER COUNTY
) CHANCERY DIVISION
)
) Plaintiff(s)) Docket No. F-038500-15
)
 vs.)
) CIVIL ACTION
)
 BLOCK: 5 LOT: 11.02 (#1)) NOTICE TO DISMISS
 ASSESSED TO: PMC COMPANY [per TSC]) SCHEDULES 4 & 5
 PMC CO., INC. [per Deed])
 106 Locke Avenue)
 -----)
 BLOCK: 11 LOT: 7 (#2))
 ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
 LLC)
 2111 US 322 [Erroneously typed as '211'
 instead of '2111' on the tax sale)
 certificate document])
 -----)
 REMOVED (#3))
 -----)
 BLOCK: 34 LOT: 2.03 (#4))
 ASSESSED TO: ELIASSEN, Joseph F. and Karen)
 A., h/w)
 Ogden Road)
 -----)
 BLOCK: 34 LOT: 2.04 (#5))
 ASSESSED TO: ELIASSEN, Joseph F. and Karen)
 A., h/w)
 Ogden Road)
 -----)
)
 _____ Defendant(s))

TO: CLERK, SUPERIOR COURT OF NEW JERSEY

TAKE NOTICE that the following schedules are hereby dismissed
because they were redeemed subsequent to the complaint filing:

-----)
 BLOCK: 34 LOT: 2.03 (#4))
 ASSESSED TO: ELIASSEN, Joseph F. and Karen)
 A., h/w)
 Ogden Road)
 -----)

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

Attorneys for Plaintiff _____ SUPERIOR COURT OF NEW JERSEY
 TOWNSHIP OF WOOLWICH, A Municipal) GLOUCESTER COUNTY
 Corporation of New Jersey) CHANCERY DIVISION
)
 Plaintiff(s)) Docket No. F-038500-15
 vs.)
) CIVIL ACTION
 BLOCK: 5 LOT: 11.02 (#1))
 ASSESSED TO: PMC COMPANY [per TSC]) FINAL JUDGMENT
 PMC CO., INC. [per Deed])
 106 Locke Avenue)
 -----)
 BLOCK: 11 LOT: 7 (#2))
 ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
 LLC)
 2111 US 322 [Erroneously typed as '211')
 instead of '2111' on the tax sale)
 certificate document])
 -----)
 REMOVED (#3))
 -----)
 REDEEMED (#4))
 -----)
 REDEEMED (#5))
 -----)
 _____ Defendant(s) _____)

THIS CAUSE being opened to the Court by Keith A. Bonchi, Esquire, of Goldenberg, Mackler, Sayegh, Mintz, Pfeffer, Bonchi & Gill, A Professional Corporation, Attorneys for Plaintiff, and it appearing that plaintiff has filed its complaint pursuant to provisions of N.J.S.A. 54:5-104.29 et seq. as amended in the Rules of this Court governing such practice and procedure to Foreclose In-Rem, certain tax sale certificates as follows:

SCHEDULE NUMBER BOOK & PAGE	TAX SALE CERTIFICATE NUMBER and RECORDED	OWNER ON LAST TAX DUPLICATE	DESCRIPTION ON TAX DUPLICATE AND IN TAX SALE CERT
1	10-7 14010 - 187	PMC Co., Inc.	Block 5 / Lot 11.02 106 Locke Avenue
2	10-8 14010 - 184	Woolwich Development Group, LLC	Block 11 / Lot 7 2111 US 322

FILE NO. 64591-2

SCHEDULE NUMBER BOOK & PAGE	TAX SALE CERTIFICATE NUMBER and RECORDED	OWNER ON LAST TAX DUPLICATE	DESCRIPTION ON TAX DUPLICATE AND IN TAX SALE CERT
3	REMOVED		
4	REDEEMED		
5	REDEEMED		

And it further appearing to the Court that notice of foreclosure suit in the form prescribed by said statute and the Rules of this Court was published once in the South Jersey Times, a newspaper published in Cherry Hill, and circulating in the Township of Woolwich, County of Gloucester on February 8, 2016, the municipality wherein the lands to be affected are located;

And it further appearing that no answer has been filed in this cause by any person having or claiming to have right, title or interest in or to, or lien upon any parcel of the land described in the Complaint filed herein within the time fixed by said statute;

And it further appearing that the plaintiff has filed a copy of the Complaint in the Office of the Tax Collector of the Township of Woolwich, and in the Office of the Clerk/Register of the County of Gloucester, and in the Office of the Attorney General of the State of New Jersey; and the Court having read and considered the Verified Complaint filed herein, together with the proof of publication, and certification of mailing and posting of the Notice of Foreclosure and the Certification showing that there has been no redemption of any of the tax sale certificates listed herein; and that the Court being satisfied and having determined that there has been a compliance with said statute;

IT IS on this _____ day of _____, 2016 ORDERED AND ADJUDGED that all persons having a vested or contingent title or interest in or lien or claim upon or against said lands, including the State of New Jersey, except as otherwise provided herein, and any agency and political subdivision thereof, and their heirs, devisees and personal representatives, and their or any of their heirs, devisees, executors, administrators, grantees, assigns or successors in right, title and interest, notwithstanding any infancy or incompetency of such person or persons, and all other persons, their heirs, devisees and personal representatives, and their or any of their heirs, or any of their devisees, executors, administrators, grantees, assigns or successors in right, title and interest, be barred of the right of redemption and be foreclosed of all prior or subsequent alienation and descents of said lands be vested in Plaintiff, the TOWNSHIP OF WOOLWICH. See Transferee List attached hereto as Exhibit "A", and Tax Sale Certificate recording information attached hereto as Exhibit "B".

IT IS FURTHER ORDERED that the plaintiff duly recover against the defendants, and all persons claiming by, through, or under them, the possession of the said lands and premises described and mentioned in the complaint and in this judgment.

IT IS FURTHER ORDERED that this judgment shall not be binding on the State of New Jersey, with regard to its tidelands, and does not extinguish the State's paramount title to any tidelands, or any of the properties listed herein, which may be claimed by the State of New Jersey, as lands now or formerly flowed by the mean high tide.

, PJ Ch.

SCHEDULE 'A'

<u>SCHEDULE NUMBER</u>	<u>TRANSFEREE OR PURCHASER OF TITLE</u>	<u>DEED DATE</u>	<u>DATE RECORDED</u>	<u>BOOK AND PAGE REFERENCE</u>
1	PMC Co., Inc.	03/22/2007	04/03/2007	4364 - 284
2	Woolwich Development Group, LLC	04/30/2008	05/08/2008	4533 - 129
3	REMOVED			
4	REDEEMED			
5	REDEEMED			

SCHEDULE 'B'

<u>SCHEDULE NUMBER</u>	<u>TAX SALE CERTIFICATE NUMBER</u>	<u>DATE RECORDED</u>	<u>BOOK AND PAGE REFERENCE</u>
1	10-7	07/09/2014	14010 - 187
2	10-8	07/09/2014	14010 - 184
3	REMOVED		
4	REDEEMED		
5	REDEEMED		

E-filing Order for ECourts

1. Notice of Motion to Enter Final Judgment: A blank piece of paper with the words “Not Applicable” is uploaded in this section.
2. Final Judgment: It has to be uploaded as a Microsoft Word Document, not scanned as a pdf.
3. Acknowledgment of Filing Complaint: includes
Acknowledgment of Filing by General Attorney,
Acknowledgment of Filing by Tax Collector
Acknowledgment of Filing by County Clerk.
4. Proof of Publication.

5. Certification of Post: includes – Certification of Posting in Tax Collector’s Office; Certification of Posting Properties Being Foreclosed; Certification of Posting in 3 conspicuous places; and Certification of Posting in County Clerk’s office.
6. Certification of Mailing: includes- Certification with Respect to Service of an In Rem Foreclosure of Tax Lien Titles, cover letter and tax list that was used for the mailing, a copy of the certified and regular mailing slips, and the service lists that were prepared with the certified tracking number written next to each address.

7. Certification of Tax Collector: which are Certification with Respect to Non-Redemption, Certification in Lieu of Affidavit re: General Land Taxes, Certification in Lieu of Affidavit re: Filing of Notice of Interested Person Pursuant to N.J.S.A. 54:5-104.48, Certification in Lieu of Affidavit with Respect to Time Periods Since Tax Sales, and as to General Land Taxes.
8. Certification in Lieu of Affidavit of No Answer.
9. Request for Entry of Default.
10. Certification of 60 Year Search.

Following entry of final judgment, a copy of the final judgment and request for entry of default should be mailed to the same parties to whom the original notice was mailed. This mailing is by ordinary mail only.

A certification of mailing of the final judgment and default should be e-filed.

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

<u>Attorneys for Plaintiff</u>	<u>SUPERIOR</u>	COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey)	GLOUCESTER COUNTY
)	CHANCERY DIVISION
)	
Plaintiff(s))	Docket No. F-038500-15
vs.)	
)	CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))	CERTIFICATION OF MAILING
ASSESSED TO: PMC COMPANY [per TSC])	FILED FINAL JUDGMENT AND
PMC CO., INC. [per Deed])	FILED REQUEST FOR ENTRY
106 Locke Avenue)	OF DEFAULT
-----)	
BLOCK: 11 LOT: 7 (#2))	
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC)	
2111 US 322 [Erroneously typed as '211' instead of '2111' on the tax sale certificate document])	
-----)	
REMOVED (#3))	
-----)	
REDEEMED (#4))	
-----)	
REDEEMED (#5))	
-----)	
)	<u>Defendant(s)</u>

SHARON A. LORENZINI, being of full age, hereby certifies:

1. I am a paralegal employed by the law firm of Goldenberg, Mackler, Sayegh, Mintz, Pfeiffer, Bonchi & Gill, A Professional Corporation, Attorneys for the plaintiff in the above entitled matter.

2. I did on May 31, 2016 mail in the U.S. Post Office, at Northfield, New Jersey, a sealed envelope with postage prepaid thereon, by regular mail, addressed to each of the parties set forth on the attached schedules, which contained a copy of the filed request for entry of default and filed final judgment in the above matter.

3. 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 wilfully false, I am subject to punishment.

 SHARON A. LORENZINI

Dated: March 20, 2017

SCHEDULE 1 / RE: BLOCK 5 - LOT 11.02 / 106 LOCKE AVENUE

ASSESSED OWNER: PMC COMPANY [per TSC]

PMC CO., INC. [per Deed]

PMC COMPANY/PMC CO., INC.
106 Locke Avenue
Woolwich Township, NJ 08085

OWNER/OCCUPANT/TENANT
106 Locke Avenue
Woolwich Township, NJ 08085

STATE OF NEW JERSEY
c/o Attorney General
P.O. Box 080
Trenton, NJ 08625

PMC COMPANY/PMC CO., INC.
1880 Superfine Lane, Apt. 22
Wilmington, DE 19802-4918

PMC COMPANY/PMC CO., INC.
P.O. Box 1115
Swedesboro, NJ 08085

PMC COMPANY/PMC CO., INC.
200 W. Locke Avenue
Swedesboro, NJ 08085

PMC COMPANY/PMC CO., INC.
C/O Div. of Commercial Recording
P.O. Box 308
Trenton, NJ 08625

PMC COMPANY/PMC CO., INC.
c/o Joseph G. Vasta R/A
1880 Superfine Lane, Apt. 22
Wilmington, DE 19802-4918

PMC COMPANY/PMC CO., INC.
c/o Joseph G. Vasta R/A
1107 Courses Landing Road
Pilesgrove, NJ 08098

PMC COMPANY/PMC CO., INC.
c/o Salvatore F. Vasta, O/O/D
1064 Courses Landing Road
Pilesgrove, NJ 08098

SCHEDULE 2 / RK: BLOCK 11 - LOT 7 / 2111 US 322 [Erroneously typed '211' on TSG]

ASSESSED OWNER: WOOLWICH DEVELOPMENT GROUP, LLC

WOOLWICH DEVELOPMENT GROUP, LLC

2111 US 322

Woolwich Township, NJ 08085

OWNER/OCCUPANT/TENANT

2111 US 322

Woolwich Township, NJ 08085

STATE OF NEW JERSEY

c/o Attorney General

P.O. Box 080

Trenton, NJ 08625

WOOLWICH DEVELOPMENT GROUP, LLC

6 Spruce Street

Woolwich Township, NJ 08085

WOOLWICH DEVELOPMENT GROUP, LLC

c/o Joseph A. DeAngelo, Jr. R/A

6 Spruce Street

Woolwich Township, NJ 08085

WOOLWICH DEVELOPMENT GROUP, LLC

C/O Div. of Commercial Recording

P.O. Box 308

Trenton, NJ 08625

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Brigantine, NJ 08203

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KATINA VELAHOS & ANTHONY VELAHOS
c/o Ward Shoemaker LLC
196 Grove Avenue, Suite A
West Deptford, NJ 08086

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Narberth, PA 19072

ARTEMIS KOCH
300 16th Street S
Brigantine, NJ 08203

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REUVEN OANANO
c/o Clerk, Superior Court of NJ
P.O. Box 971
Trenton, NJ 08625

REUVEN OANANO
c/o Steven C. Forman, Esquire
540 N. Route 73
Box 331
W. Berlin, NJ 08091

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10 Baltusrol Terrace
Moorestown, NJ 08057

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c/o Thomas A. McKinney, Esquire
1107 Goffle Road
Hawthorne, NJ 07507

TIM McKINNEY a/k/a TIMOTHY B. McKINNEY, MD
3021 NE 23RD Court
Fort Lauderdale, FL 33305

TIM McKINNEY a/k/a TIMOTHY B. McKINNEY, MD
212 Melody Lane
Lavallette, NJ 08735

ROBERT CAIONE
25 Hunters Creek Circle
Mallica Hill, NJ 08062-2635

DRESDNER ROBIN ENVIRONMENTAL
MANAGEMENT, INC./ PERKS REUTTER DIV.
4300 Haddonfield Road, Suite 115
Pennsauken, NJ 08109

SCHEDULE 5 / ADDITIONAL PARTIES / ALL PROPERTIES

STATE OF NEW JERSEY
c/o Attorney General
P.O. Box 080
Trenton, NJ 08625

CONNECTIV POWER SERVICES
Attn: Manager of R/E & R/W
5100 Harding Highway, Suite 399
Mays Landing, NJ 08330

SOUTH JERSEY GAS CO.
Attn: Engineering Manager
1 South Jersey Plaza
Hammonton, NJ 08037

PUBLIC SERVICE ELECTRIC & GAS CO.
Attn: Manager-Corporate Properties
80 Park Plaza, T6B
Newark, NJ 07012

NJ STATE DEPT OF TRANSPORTATION
Attn: Planning Division
P.O. Box 600
Trenton, NJ 08625

GLOUCESTER COUNTY DEPT. OF PUBLIC WORKS
Attn: Planning Division
Route 47/Delsea Drive
Clayton, NJ 08312

COMCAST CABLE CO.
Attn: James Parkinson
1846 N. W. Boulevard
Vineland, NJ 08360

WASTE MANAGEMENT
P.O. Box 13648
Philadelphia, PA 19101

N.J.S.A.54:5-104.65 requires that the final judgment be recorded in the office of the County Clerk or Register to obtain fee title.

NOTE: Filed pleadings from the Foreclosure Office now have the docket number and filing information at the top of each page in 'blue type'. When recording the final judgment in the county, be certain to send the copy with the 'blue type' to the recording office.

If you are working with an abstracting company, this is the point at which you request the Certificate of Regularity to issue.

As previously stated, redemption can be made through the date the final judgment is actually recorded in the county.

Following recording of the final judgment, the municipality may be willing to permit redemption. In that event, the final judgment must be vacated as to that property.

KEITH A. BONCHI, ESQUIRE - KAB032321983
GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
660 New Road, Suite 1-A
Northfield, NJ 08225
(609) 646-0222

Attorneys for Plaintiff) SUPERIOR COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal) GLOUCESTER COUNTY
Corporation of New Jersey) CHANCERY DIVISION
)
Plaintiff(s)) Docket No. F-038500-15
vs.)
) CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))
ASSESSED TO: PMC COMPANY [per TSC]) NOTICE OF MOTION TO VACATE
PMC CO., INC. [per Deed]) FINAL JUDGMENT ENTERED
106 Locke Avenue) 5/27/2016 AS TO SCHEDULE 2
-----)
BLOCK: 11 LOT: 7 (#2))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
LLC)
2111 US 322 [Erroneously typed as '211')
instead of '2111' on the tax sale)
certificate document])
-----)
REMOVED (#3))
-----)
REDEEMED (#4))
-----)
REDEEMED (#5))
-----)
Defendant[s])

SCHEDULE 2
RE: BLOCK 11 - LOT 7 / 2111 US 322 [Erroneously typed '211' on TSC]
ASSESSED OWNER: WOOLWICH DEVELOPMENT GROUP, LLC
WOOLWICH DEVELOPMENT GROUP, LLC
2111 US 322
Woolwich Township, NJ 08085

OWNER/OCCUPANT/TENANT
2111 US 322
Woolwich Township, NJ 08085

STATE OF NEW JERSEY
c/o Attorney General
P.O. Box 080
Trenton, NJ 08625

WOOLWICH DEVELOPMENT GROUP, LLC
6 Spruce Street
Woolwich Township, NJ 08085

FILE NO. 64591-2

WOOLWICH DEVELOPMENT GROUP, LLC
c/o Joseph A. DeAngelo, Jr. R/A
6 Spruce Street
Woolwich Township, NJ 08085

WOOLWICH DEVELOPMENT GROUP, LLC
C/O Div. of Commercial Recording
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MANAGEMENT, INC./ PERKS REUTTER DIV.
4300 Haddonfield Road, Suite 115
Pennsauken, NJ 08109

Christopher Wisniewski, Esquire
WISNIEWSKI LAW GROUP, LLC
591 Mantua Boulevard, Suite 200
Scwell, NJ 08080

TAKE NOTICE we apply before the Superior Court of New Jersey, Chancery Division, Richard J. Hughes Justice Complex, Trenton, New Jersey 08625, for an Order Vacating the Final Judgment entered on May 27, 2016, in this action in favor of plaintiff for the relief demanded in the complaint and shall file proof required by R.4:64-2, as to Schedule #2 only.

If you want to object to this motion you must do so in writing within 10 days after the day you received this motion. Any objection must address the subject of the motion and detail with specificity the basis of the objection. You must file your objection with the Office of Foreclosure, P.O. Box 971, 25 Market Street, Trenton, New Jersey 08625, and serve a copy on the moving party. The Office of Foreclosure does not conduct hearings.

Your personal appearance at the Office will not qualify as an objection. If you file a[n] specific objection, the case will be sent to a Judge for resolution. You will be informed by the Judge of the time and place of the hearing on the motion.

GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
Attorneys for Plaintiff

BY _____
KEITH A. BONCHI

DATED: March 20, 2017

KEITH A. BONCHI, ESQUIRE - KAB032321983
GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
660 New Road, Suite 1-A
Northfield, NJ 08225
(609) 646-0222

Attorneys for Plaintiff) SUPERIOR COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal) GLOUCESTER COUNTY
Corporation of New Jersey) CHANCERY DIVISION
)
Plaintiff(s)) Docket No. F-038500-15
)
vs.)
) CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))
ASSESSED TO: PMC COMPANY [per TSC]) CERTIFICATION IN SUPPORT
PMC CO., INC. [per Deed]) OR ORDER TO VACATE
106 Locke Avenue) FINAL JUDGMENT ENTERED
-----) 5/27/2016 AS TO SCHEDULE 2
BLOCK: 11 LOT: 7 (#2))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
LLC)
2111 US 322 [Erroneously typed as '211')
instead of '2111' on the tax sale)
certificate document])
-----)
REMOVED (#3))
-----)
REDEEMED (#4))
-----)
REDEEMED (#5))
-----)
Defendant[s])

KEITH A. BONCHI, of full age, by way of certification in
accordance with R.1:4-4(b), says:

1. I am attorney at law of the State of New Jersey and a
partner of the law firm of Goldenberg, Mackler, Sayegh, Mintz, Pfoffer,
Bonchi & Gill, a Professional Corporation, Attorneys for Plaintiff in the
within matter.

2. Plaintiff has accepted full redemption on Schedule #2, as
described below, and is desirous of having its final judgment, which was
entered on May 27, 2016, vacated as to this schedule. Said final judgment
was recorded in the Clerk's Office of Gloucester County on June 6, 2016, in
book 5478 of deeds, page 14.

-----)
BLOCK: 11 LOT: 7 (#2))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
LLC)
2111 US 322 [Erroneously typed as '211')
instead of '2111' on the tax sale)
certificate document])
-----)

FILE NO. 64591-2

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

KEITH A. BONCHI

DATED: March 20, 2017

KEITH A. BONCHI, ESQUIRE - KAB032321983
 GOLDENBERG, MACKLER, SAYEGH, MINTZ,
 PFEFFER, BONCHI & GILL
 A Professional Corporation
 660 New Road, Suite 1-A
 Northfield, NJ 08225
 (609) 646-0222

<u>Attorneys for Plaintiff</u>	<u>SUPERIOR COURT OF NEW JERSEY</u>)
TOWNSHIP OF WOOLWICH, A Municipal Corporation of New Jersey) GLOUCESTER COUNTY
) CHANCERY DIVISION
)
	Plaintiff(s)) Docket No. F-038500-15
vs.)
) CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1))
ASSESSED TO: PMC COMPANY [per TSC]) ORDER VACATING FINAL
PMC CO., INC. [per Deed]) JUDGMENT ENTERED 5/27/2016
106 Locke Avenue) AS TO SCHEDULE 2
-----)
BLOCK: 11 LOT: 7 (#2))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC)
2111 US 322 [Erroneously typed as '211' instead of '2111' on the tax sale certificate document])
-----)
REMOVED (#3))
-----)
REDEEMED (#4))
-----)
REDEEMED (#5))
-----)
	Defendant[s])

THIS MATTER being opened to the Court by Goldenberg, Mackler, Sayegh, Mintz, Pfeiffer, Bonchi & Gill, A Professional Corporation, Attorneys for Plaintiff, and it appearing that plaintiff has elected to have its final judgment entered on 5/27/2016 as to Schedule #22 only, as described below:

-----)
BLOCK: 11 LOT: 7 (#2))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP, LLC)
2111 US 322 [Erroneously typed as '211' instead of '2111' on the tax sale certificate document])
-----)

which final judgment was recorded in the Clerk's Office of Gloucester County on June 6, 2016, in book 5478 of deeds, page 14; and for good cause shown:

FILE NO. 64591-2

IT IS on this _____ day of _____, 2016, ORDERED
that the final judgment entered on 5/27/2016, as to Schedule #2, as described
above, which final judgment was recorded in Clerk's Office of Gloucester
County on June 6, 2016, in book 5478 of deeds, page 14, be vacated, and that
plaintiff be permitted to have said schedule removed from this action.

KEITH A. BONCHI, ESQUIRE - KAB032321983
GOLDENBERG, MACKLER, SAYEGH, MINTZ,
PFEFFER, BONCHI & GILL
A Professional Corporation
660 New Road, Suite 1-A
Northfield, NJ 08225
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Attorneys for Plaintiff) SUPERIOR COURT OF NEW JERSEY
TOWNSHIP OF WOOLWICH, A Municipal) GLOUCESTER COUNTY
Corporation of New Jersey) CHANCERY DIVISION
)
Plaintiff(s)) Docket No. F-038500-15
vs.)
) CIVIL ACTION
BLOCK: 5 LOT: 11.02 (#1)) CERTIFICATION OF MAILING
ASSESSED TO: PMC COMPANY [per TSC]) NOTICE OF MOTION TO VACATE
PMC CO., INC. [per Deed]) FINAL JUDGMENT ENTERED
106 Locke Avenue) 5/27/2016 AS TO SCHEDULE 2
-----)
BLOCK: 11 LOT: 7 (#2))
ASSESSED TO: WOOLWICH DEVELOPMENT GROUP,)
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2111 US 322 [Erroneously typed as '211')
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certificate document])
-----)
REMOVED (#3))
-----)
REDEEMED (#4))
-----)
REDEEMED (#5))
-----)
Defendant[s])

SHARON A. LORENZINI, of full age, by way of certification in accordance with R.1:4-4(b), says:

1. I am a paralegal employed by the law firm of Goldenberg, Mackler, Sayegh, Mintz, Pfeffer, Bonchi & Gill, a Professional Corporation, Attorneys for Plaintiff in the within matter.

2. On July 1, 2016, I caused to be mailed in the U.S. Post Office, at Northfield, New Jersey, a sealed envelope, with postage prepaid thereon, addressed to the following, by certified mail, return receipt requested, and by regular mail, copies of the following Notice of Motion for Judgment entered 5/27/2016, as to Schedule #2 only, Certification in Support of Notice of Motion, proposed form of Order and Certification of Mailing:

SCHEDULE 2
RE: BLOCK 11 - LOT 7 / 2111 US 322 [Erroneously typed '211' on TSC]
ASSESSED OWNER: WOOLWICH DEVELOPMENT GROUP, LLC

FILE NO. 64591-2

WOOLWICH DEVELOPMENT GROUP, LLC
2111 US 322
Woolwich Township, NJ 08085

OWNER/OCCUPANT/TENANT
2111 US 322
Woolwich Township, NJ 08085

STATE OF NEW JERSEY
c/o Attorney General
P.O. Box 080
Trenton, NJ 08625

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MANAGEMENT, INC. / PERKS REUTER DIV.
4300 HADDONFIELD ROAD, SUITE 115
PENNSAUKEN, NJ 08109

CHRISTOPHER WISNIEWSKI, ESQUIRE
WISNIEWSKI LAW GROUP, LLC
591 MANTUA BOULEVARD, SUITE 200
SEWELL, NJ 08080

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

SHARON A. LORENZINI

DATED: July 1, 2016

Contesting Answers

- Receive notification from eCourts
- N.J.S.A. 54:5-104.58 requires that contesting schedule be severed from main foreclosure and assigned its own docket number.
- Must file motion or submit Consent Order to Sever.
- Upon obtaining Order to Sever, must file new foreclosure complaint attaching Order severing and prior complaint as schedules.

Motion to Strike Contesting Answer

- Should make motion expeditiously.
- N.J.S.A. 54:5-52 does not allow owner to dispute validity of tax sale after two years of the recording of the tax sale certificate unless there was fraud.
- Cannot do a tax appeal as a defense to the tax sale foreclosure.
- Almost all contesting answers can be dealt with quickly since the main defense is that defendant paid taxes.

Redemptions

- May redeem through the date that final judgment is recorded in the county.
- Keep in mind that once final judgment is applied for, application to vacate the final judgment is required.
- Redemption is made directly to the Tax Collector.
- Tax Collector must notify attorney of redemptions.

- N.J.S.A. 54:5-104.59 and New Jersey Court Rule 4:42-9 and 4:42-10 govern costs:
 - \$500.00 counsel fee
 - Cost of search
 - All other costs must be equitably apportioned.

NOTE: If it is necessary to vacate the final judgment, there are fees and costs associated with the vacation and they can be added to the redemption amount.

Redemptions after Application for Final Judgment

- Do not stop foreclosure.
- Keep a list and then make a Motion to Vacate Final Judgment.
- Order should be specific as to schedules being vacated.

Bankruptcies

- Foreclosure search may disclose bankruptcy at time of the tax sale with automatic stay in effect:
 - can make a Motion for relief *nunc pro tunc*; or
 - invalidate tax sale certificate and sell in next tax sale.
- Bankruptcy still in effect and automatic stay is in effect:
 - cannot file *In Rem* until automatic stay lifted.
 - municipality should file Proof of Claim and protect its interest in the bankruptcy.
- Bankruptcy is filed during *In Rem*:
 - schedule is stayed as long as automatic stay is in effect.
 - may have to dismiss schedule.

Motions to Vacate Final Judgments

- N.J.S.A. 54:5-104.67 states:
“No application shall be entertained to reopen such judgment after three months from the date of the recording thereof in the office of the county recording officer, and then only upon the grounds of lack of jurisdiction or fraud in the conduct of the action”.
- N.J.S.A. Court Rule 4:50-1 also applies and provides up to one year to vacate.

- If a Motion to Vacate is filed, check with municipality to determine if it would rather have the money or the property.
 - If municipality would rather have the money, you can charge the costs of vacating the Final Judgment
 - If the municipality would rather have the property, then oppose the Motion
- Each Motion to Vacate is fact sensitive. Usually it is argued that service was not correct. Closely scrutinize the Motion.

Who can redeem

- N.J.S.A. 54:5-54 limits who can redeem to “the owner, his heirs, holder of any prior outstanding tax lien certificate, mortgagee, or occupant of land.....”
- N.J.S.A. 54:5-98 states:
“After the complaint is filed redemption shall be made in that cause only...”
 - contract purchaser cannot redeem.
 - equitable owners or interests cannot redeem.

Thank you

- + Thanks to our speakers for presenting today's program.
- + Please remember to sign your affirmation form and either fax or e-mail it to ICLE:
- + Fax: 732-249-1428
- + E-Mail: smilek@njsba.com



Speaker Biographies

Keith A. Bonchi is a Senior Partner in Goldenberg, Mackler, Sayegh, Mintz, Pfeffer, Bonchi & Gill, P.C. with offices in Northfield, Atlantic City, Rio Grande and Vineland, New Jersey. He concentrates his practice in commercial law with an emphasis in general equity litigation involving municipal liens and real estate.

Past Chair of the Atlantic County Bar Association's Civil Litigation Committee and the District I Ethics Committee, Mr. Bonchi has been General Counsel to the New Jersey Tax Collectors and Treasurers' Association, a member of the New Jersey *Ad Hoc* Committee on Foreclosures and Special Counsel to the New Jersey League of Municipalities, the Borough of Woodlynne, the City of Hackensack, the City of Asbury Park and the City of Burlington. He has lectured for ICLE and the New Jersey Judicial College, and is the recipient of the Benjamin A. Rimm "Outstanding Young Lawyer" Award bestowed by the Atlantic County Bar Association. Mr. Bonchi received his undergraduate degree, *magna cum laude*, from Beaver College and his J.D. from Seton Hall University School of Law, where he was Staffing and Projects Editor of the *Seton Hall Legislative Journal*.

Sharon A. Lorenzini is a paralegal with Goldenberg, Mackler, Sayegh, Mintz, Pfeffer, Bonchi & Gill, P.C. with offices in Northfield, Atlantic City, Rio Grande and Vineland, New Jersey. She focuses in tax foreclosures, mortgage foreclosures and estate administration. With more than 50 years of legal experience, Ms. Lorenzini is an Advisory Board member of Cumberland County College's Paralegal Studies Program and a founding member and former officer of the Cumberland County Legal Secretaries' Association. She has been a panelist for ICLE on tax and mortgage foreclosure topics for 25 years.

Ms. Lorenzini received her Associate's degree and Paralegal Certification from Cumberland County College, where she was a member of the *Phi Theta Kappa* International Scholastic Honor Society.