

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

LEGAL SERVICES OF NEW JERSEY

By: Margaret Lambe Jurow, Esq.
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Attorneys for Phyllis Hollis, debtor, Plaintiff

In Re:

PHYLLIS A. HOLLIS

THOMAS J. ORR, Trustee and
PHYLLIS A. HOLLIS, individually, debtor,

Plaintiffs,

v.

AMERIQUEST MORTGAGE COMPANY,
AMERIQUEST MORTGAGE SECURITIES, INC., DEUTSCHE
BANK NATIONAL TRUST COMPANY, AMC MORTGAGE
SERVICES, JOHN DOES 1-5,

Defendants.

Case No.: 07 – 22759 (KCF)

Adv. Pro. 07-02615

Hearing Date: November 17, 2008

Judge: Kathryn C. Ferguson

**CERTIFICATION OF COUNSEL IN OPPOSITION TO DEFENDANTS' MOTION FOR A
PROTECTIVE ORDER AND IN SUPPORT OF MOTION TO COMPELL DISCOVERY**

Margaret Lambe Jurow, of full age, hereby certifies as follows:

1. I am a senior attorney at Legal Services of New Jersey. I am primarily responsible for the above captioned matter. I make this certification of my own personal knowledge except where otherwise noted.
2. Attached as Exhibit A are true copies of discovery propounded upon the defendants and the answers thereto.
3. Subsequent to the provision of these answers the defendants collectively provided a copy of the pooling and servicing agreement dated March 1, 2006. The Table of Contents, Section Two and the signature section of the agreement is attached hereto as Exhibit B. The undersigned will provide the balance of the document if requested. The entire

document consists of nearly 200 pages. Attached as Exhibit C is a copy the assignment of Mortgage provided by the defendants in connection with Rule 26 disclosures. It is dated June 26, 2007 and signed by Tamara Price and bears the notarization of R. P. Umali.

4. Attached as Exhibit D is an excerpt of deposition of Tamara Price in a wholly separate action pending in Florida in which Ms. Price testifies that it is typical for her to sign a document outside the presence of a notary and then for the document to be transported to a notary elsewhere.

I certify that the foregoing statements made by me are true. I understand that if any of the foregoing is willfully false I may be subject to punishment.

/s/ Margaret Lambe Jurow

Margaret Lambe Jurow

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