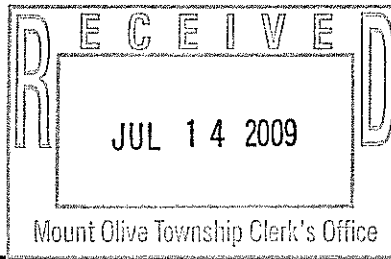


PELEGRINO & FELDSTEIN, LLC
290 ROUTE 46 WEST
DENVER, NJ 07834
(973) 586-2300
OUR FILE NO. 10934-09
ATTORNEYS FOR PLAINTIFF

©



cc: Admin
Tax Collector
Fax: J. Dorsey

G.U. RAO
Plaintiff

vs.

ANTHONY TARTELL
TOWNSHIP OF MOUNT OLIVE, et als
Defendant(s)

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION

MORRIS COUNTY

DOCKET NO. F-24787-09

SUMMONS

From The State of New Jersey,
To the Defendant(s) Named above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN 971, Trenton, NJ 08625. An \$ 135.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and cost of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: July 8, 2009

Theodore J. Fetter

THEODORE J. FETTER, Clerk of the Superior Court

Name of Defendant to be served: **TOWNSHIP OF MOUNT OLIVE**
Address for service: C/O CLERK, LISA LASHWAY
204 FLANDERS-DRAKESTOWN ROAD, BUDD LAKE, NJ 07828

10934

FORECLOSURE CASE INFORMATION STATEMENT (FCIS)

FOR USE BY CLERK'S OFFICE ONLY

PAYMENT TYPE: CK CG

CHG/CK NO.

AMOUNT:

OVERPAYMENT:

BATCH NUMBER



Use for initial Chancery Division - General Equity
foreclosure pleadings (not motions) under Rule 4:5-1.

Pleading will be rejected for filing, under Rule 1:5-6(c), if information above
the black bar is not completed or if attorney's signature is not affixed.

CAPTION
G.U. RAO

COUNTY OF VENUE
MORRIS

vs.
ANTHONY TARTELL; ANGELA TARTELL, HIS WIFE; ANGELA SIMONI; JOHN
DOE HUSBAND OF ANGELA SIMONI, SAID NAME JOHN DOE BEING
FICTITIOUS ; TOWNSHIP OF MOUNT OLIVE; CORESTATES BANK OF
DELAWARE, N. A. ; NATWEST USA ; FIRST FIDELITY BANK, N.A. NEW

NAME OF FILING PARTY
G.U. RAO

DOCKET NUMBER
F- 2478729

DOCUMENT TYPE
 COMPLAINT ANSWER

ATTORNEY/SELF REPRESENTED NAME:
MICHAEL G. PELLEGRINO, ESQ.

TELEPHONE NUMBER
(973)-586-2300

FIRM NAME:
PELLEGRINO & FELDMAN, LLC

ADDRESS:
290 ROUTE 46 WEST
DENVER, N.J. 07834

- FORECLOSURE CASE TYPE NUMBER
- 088 IN PERSONAM TAX FORECLOSURE
 - 089 IN REM TAX FORECLOSURE
 - 0RF RESIDENTIAL MORTGAGE FORECLOSURE
 - 0CD CONDOMINIUM OR HOMEOWNER'S ASSOCIATION LIEN FORECLOSURE
 - 091 STRICT FORECLOSURE
 - OPTIONAL FORECLOSURE PROCEDURE (NO SALE)

DEFENDANT(S) NAMES:
ANTHONY TARTELL; ANGELA TARTELL, HIS WIFE; ANGELA
SIMONI; JOHN DOE HUSBAND OF ANGELA SIMONI, SAID NAME
JOHN DOE BEING FICTITIOUS ; TOWNSHIP OF MOUNT OLIVE;
CORESTATES BANK OF DELAWARE, N. A. ; NATWEST USA ;
FIRST FIDELITY BANK, N.A. NEW JERSEY ; CITIBANK, N. A. A/K/A
CITIBANK, SOUTH DAKOTA N.A. ; CHASE MANHATTAN BANK

PROPERTY STREET ADDRESS:
212 ROUTE 46

MUNICIPALITY COUNTY
MOUNT OLIVE MORRIS
MUNICIPAL

LOT 14 BLOCK 3305

ZIP CODE: 07828

MORTGAGE FORECLOSURE TYPE
 RESIDENTIAL COMMERCIAL

PURCHASE MONEY MORTGAGE YES NO

RELATED PENDING CASE YES NO
IF YES, LIST DOCKET NOS:

ATTORNEY SIGNATURE

PRINT ATTORNEY NAME
MICHAEL G. PELLEGRINO

DATE
May 14, 2009

PELLEGRINO & FELDSTEIN, L.L.C.
290 Route 46 West
Denville, NJ 07834
(973) 586-2300
CAP File No. 10934-09
Attorneys for Plaintiff(s)

FILED

MAY 18 2009

SUPERIOR COURT
CLERK'S OFFICE

G.U. RAO
Plaintiff

vs.

ANTHONY TARTELL AND ANGELA TARTELL
HIS WIFE; ANGELA SIMONI AND JOHN DOE
HUSBAND OF ANGELA SIMONI, SAID NAME
JOHN DOE BEING FICTITIOUS ; TOWNSHIP
OF MOUNT OLIVE; CORESTATES BANK OF
DELAWARE, N. A. ; NATWEST USA ; FIRST
FIDELITY BANK, N.A. NEW JERSEY ;
CITIBANK, N. A. A/K/A CITIBANK, SOUTH
DAKOTA N.A. ; CHASE MANHATTAN BANK;
Defendant(s)

SUPERIOR COURT OF NEW JERSEY
CHANCERY DIVISION

MORRIS COUNTY

DOCKET NO. F 24787-09

CIVIL ACTION
FORECLOSURE COMPLAINT

G.U. RAO, complaining of the Defendant(s) says:

FIRST COUNT

1. Title of record to the premises became vested in Anthony Tartell and Angela Tartell, his wife, by Deed from Robert J. Gaughran, Administrator, CTA of the Estate of Jane Minizak, deceased, dated April 21, 1989, and recorded in the MORRIS County Clerk's/Register's Office on April 27, 1989, in Deed Book 3121, page 148. Also title of record to the premises as to 50% interest became vested in Angela Simoni, by Deed from Anthony Tartell and Angela Tartell p/k/a Angela Tartell, dated October 3, 2008, and recorded in the MORRIS County Clerk's/Register's Office on February 17, 2009, in Deed Book 21224, page 1183.
2. The premises in question for this Count are known as LOT 14 BLOCK 3305 on the Tax Map of MOUNT OLIVE, County of MORRIS, State of New Jersey.

3. Taxes were assessed against the premises described in Paragraph 2 herein in the name of TARTELL, ANGELA & ANTHONY A. for the year(s) 2002, and the said taxes not having been paid, on 10-16-2003, sale of the lands for delinquent taxes, water and/or sewer charges in the amount of \$1157.01 was made by SHERRY M. JENKINS , Tax Collector of MOUNT OLIVE, under and by virtue of the provisions of statutes in such case made and provided of the State of New Jersey, which said sale was conducted in all things according to the provisions of such act.
4. At the said sale, the lands and premises described in Paragraph 2 herein were struck off and sold to G.U. RAO, subject to redemption with interest at 4.00 % for the sum of \$ 1464.41, which certificate of sale was in the form prescribed by statute of the State of New Jersey. Said Tax Sale Certificate dated 10-20-2003 was recorded in the Clerk's/Register's Office of MORRIS County on 11-24-2003, Mortgage Book 16026 at Page 72.
5. All subsequent municipal liens which have been assessed against the premises described in Paragraph 2 herein by the municipality of MOUNT OLIVE have been paid prior to the commencement of this action.
6. More than two years have elapsed since said sale without redemption and the plaintiff is the holder of said tax sale certificate, and taxes and assessments have been accrued and are owing to the plaintiff since the date of said sale.
7. On 4/14/2009, the plaintiff served written notice, by certified mail with postage prepaid thereon, of plaintiff's intention to file the within complaint, which notice included the amount due on the tax lien or lie to be foreclosed herein as of the date of the notice, to the last known addresses of all parties entitled to redeem in accordance with N.J.S.A. 54:5-97.1 and 54:5-54, as amended, and on the same date also filed such notice with the municipal tax collector's office.
8. Any interest or lien which any of the defendants herein has or claims to have in or upon the said premises described in Paragraph 2 herein or some part thereof, is subject to the lien of the Plaintiff's tax sale certificate.
9. There is now due on said tax sale certificate #03-034 which is described in paragraphs 3 and 4 herein, the

sum of \$1464.41, which was the original amount due for unpaid taxes and costs, together with subsequent taxes paid thereon with statutory interest due to the Plaintiff. In addition, the tax collector will add any additional interest, additional taxes and/or penalties that may become due and owing as of the date that redemption occurs.

10. Schedule A attached hereto is made part hereof and the paragraph therein are incorporated herein in their entirety.

WHEREFORE, Plaintiff demands Judgment:

- (a) Fixing the amount due on said Tax Sale Certificate;
- (b) Barring and foreclosing the defendants of all equity of redemption in and to the lands and premises described in Paragraph 2 above;
- (c) Directing that the Plaintiff be paid the amount due on said tax sale certificate together with interest and costs by a short day to be appointed by this Honorable Court for the purposes, or in default thereof, that the said defendants and all persons claiming by, through or under them may be debarred and foreclosed of and from all equity and right of redemption on or to the premises described in Paragraph 2 herein.
- (d) Directing that the Plaintiff be vested with an absolute and indefeasible estate of inheritance in fee simple in and to the lands described in Paragraph 2 herein.

SECOND COUNT

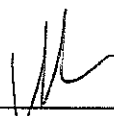
1. By virtue of the entry of judgment in Count 1, Plaintiff is entitled to possession of premises located in MOUNT OLIVE, County of MORRIS, and State of New Jersey, more particularly described in Paragraph 2 of the First Count. Said claims are joined in one action pursuant to R.4:27-2.
2. Defendants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

PELLEGRINO & FELDSTEIN, LLC
Attorneys for Plaintiff

By: _____


Deborah T. Feldstein, Esq.

DATED: May 14, 2009

CERTIFICATION

The undersigned hereby certifies that the within matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding. There are no other known parties who should be joined in this action at this time.

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.

PELLEGRINO & FELDSTEIN, LLC
Attorneys for Plaintiff

By: _____


Deborah T. Feldstein, Esq.

DATED: May 14, 2009

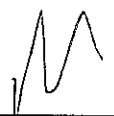
CERTIFICATION

The undersigned hereby certifies that this firm has obtained and reviewed a 60 year title search related to the subject premises pursuant to R4:64-1(a).

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.

PELLEGRINO & FELDSTEIN, LLC
Attorneys for Plaintiff

By: _____


Deborah T. Feldstein, Esq.

DATED: May 14, 2009

SCHEDULE A

A) After due inquiry, the Plaintiff has been unable to ascertain the name of the husband of Angela Simoni, if any, and said husband is designated as John Doe, husband of Angela Simoni.

B) On August 18, 1993, The Township of Mount Olive, recorded a Tax Sale Certificate bearing No. 67-93 against Tartell, Angela and Anthony , for a debt of \$2289.27 , sold on June 30, 1993 for unpaid taxes/utility charges for the year(s) 1992 recorded in the MORRIS County Clerk's/Register's Office in Mortgage Book 4867 at page 103, dated July 12, 1993 . Said lien is subordinate to the Tax Sale Certificate being foreclosed herewith. Upon information and belief the above referenced lien has been redeemed however remains open of record in the MORRIS County Clerk's/Register's Office.

c) On July 31, 2002, The Township of Mount Olive , recorded a Tax Sale Certificate bearing No. 020044 against Tartell, Angela and Anthony for a debt of \$2162.43, sold on May 23, 2002 for unpaid taxes/utility charges for the year(s) 2001 recorded in the MORRIS County Clerk's/Register's Office in Mortgage Book 12133 at page 196, dated May 30, 2002. Said lien is subordinate to the Tax Sale Certificate being foreclosed herewith. Upon information and belief the above referenced lien has been redeemed however remains open of record in the MORRIS County Clerk's/Register's Office.

d) The plaintiffs which appear on the attached abstract of judgments are joined herein as parties defendant. Any lien which they may have is subordinate to the lien being foreclosed herein.

SUPERIOR COURT OF NEW JERSEY

JUDGMENT NUMBER: J-000029-1993 CASE NUMBER: L-000485-92
DATE ENTERED: 01/04/93 DATE SIGNED: 12/21/92
TYPE OF ACTION: CONTRACT
VENUE: SUSSEX

DEBT: \$ 6,494.89
COSTS: \$ 175.00

CREDITOR(S):

FIRST FIDELITY BANK , N. A. , NEW JERSEY
ATTORNEY: CRANER, NELSON, SATKIN, ET AL

DEBTOR(S):

ANGELA TARTELL
AND
ANTHONY TARTELL
5 NEWTON AV, STANHOPE, NJ 07874

PLUS POSTJUDGMENT INTEREST

Includ 3

08-29-95 ORDER CANCELLING AND DISCHARGING JUDGMENT PURSUANT TO BANK-
RUPTCY. RECORDED 09-15-95.

*** End of Abstract ***

SUPERIOR COURT OF NEW JERSEY

JUDGMENT NUMBER: J-020520-1993 CASE NUMBER: L-000885-92
DATE ENTERED: 02/24/93 DATE SIGNED: 02/16/93
TYPE OF ACTION: CONTRACT
VENUE: SUSSEX

DEBT: \$ 8,769.01
COSTS: \$ 192.16

CREDITOR(S):

CITIBANK , N. A.
ATTORNEY: PRESSLER & PRESSLER

DEBTOR(S):

ANGELA TARTELL
5 NEWTON AV, STANHOPE, NJ 07874

Includ 4

08-29-95 ORDER CANCELLING & DISCHARGING JUDGMENT PURSUANT TO N.J.S.A.
2A: 16-49-1. RECORDED 09-15-95.

*** End of Abstract ***

SUPERIOR COURT OF NEW JERSEY

JUDGMENT NUMBER: J-084080-1993 CASE NUMBER: L-00485-93
DATE ENTERED: 09/07/93 DATE SIGNED: 08/24/93
TYPE OF ACTION: CONTRACT
VENUE: SUSSEX

DEBT: \$ 13,801.77
COSTS: \$ 192.16

CREDITOR(S):
CHASE MANHATTAN BANK
ATTORNEY: DAVID A. WEINSTEIN

DEBTOR(S):
TONY TARTELL
AND
ANGELA MAHL TARTELL
A/K/A
ANGELA M. TARTELL
5 NEWTON AV, STANHOPE, NJ 07874

include 5

08-29-95 ORDER CANCELLING & DISCHARGING JUDGMENT PURSUANT TO N.J.S.A.
2A: 16-49-1. RECORDED 09-15-95.
ANGELA MAHL ADDED TO OUR INDEX.
*** End of Abstract ***

SUPERIOR COURT OF NEW JERSEY

JUDGMENT NUMBER: J-095564-1993 CASE NUMBER: L-000486-93
DATE ENTERED: 10/18/93 DATE SIGNED: 09/16/93
TYPE OF ACTION: CONTRACT
VENUE: SUSSEX

DEBT: \$ 12,715.40
COSTS: \$ 192.16

CREDITOR(S):
CITIBANK , SOUTH DAKOTA N. A.
ATTORNEY: DAVID A. WEINSTEIN

DEBTOR(S):
ANGELA MAHL TARTELL
A/K/A
ANGELA M. TARTELL
5 NEWTON AV, STANHOPE, NJ 07874

include 6

08-29-95 ORDER CANCELLING AND DISCHARGING JUDGMENT PURSUANT TO N.J.S.A.
2A: 16-49-1. RECORDED 09-15-95.
ANGELA MAHL ADDED TO OUR INDEX.
*** End of Abstract ***

<p>ATLANTIC COUNTY: Deputy Clerk of the Superior Court Civil Division, Direct Filing 1201 Bacharach Blvd., First Fl. Atlantic City, NJ 08401 LAWYER REFERRAL - LEGAL SERVICES (609) 345-3444 - (609) 348-4200</p>	<p>CUMBERLAND COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office Broad & Fayette Sts., P.O. Box 615 Bridgeport, NJ 08302 LAWYER REFERRAL - LEGAL SERVICES (856)692-6207 - (856)451-0003</p>	<p>MERCER COUNTY: Deputy Clerk of the Superior Court Local Filing Office, Courthouse 175 South Broad St., P.O. Box 8068 Trenton, NJ 08650 LAWYER REFERRAL - LEGAL SERVICES (609)585-6200 - (609)695-6249</p>
<p>BERGEN COUNTY: Deputy Clerk of the Superior Court Case Processing Section, Room 119 Justice Center, 10 Main Street Hackensack, NJ 07601-0769 LAWYER REFERRAL - LEGAL SERVICES (201)488-0044 - (201)487-2166</p>	<p>ESSEX COUNTY: Deputy Clerk of the Superior Court 237 Hall of Records 465 Dr. Martin Luther King, Jr. Blvd. Newark, NJ 07102 LAWYER REFERRAL - LEGAL SERVICES (973)622-6207 - (973)624-4500</p>	<p>MIDDLESEX COUNTY: Deputy Clerk of the Superior Court Administration Building Third Floor 1 Kennedy Sc., P.O. Box 2633 New Brunswick, NJ 08903-2633 LAWYER REFERRAL - LEGAL SERVICES (732)828-0053 - (732)249-7600</p>
<p>BURLINGTON COUNTY: Deputy Clerk of the Superior Court Central Processing Office Attn: Judicial Intake First F., Courts Facility 49 Rancocas Rd. Mt. Holly, NJ 08060 LAWYER REFERRAL (609) 261-4862 LEGAL SERVICES (609)261-1088</p>	<p>GLOUCESTER COUNTY: Deputy Clerk of the Superior Court Civil Case Management Office Attn: Intake First Fl., Court House 1 North Broad Street., P.O. Box 129 Woodbury, NJ 08096 LAWYER REFERRAL (609)848-4589 LEGAL SERVICES (856)848-5360</p>	<p>MONMOUTH COUNTY: Deputy Clerk of the Superior Court 71 Monument Park P.O. Box 1262 Court House, East Wing Freehold, NJ 07728-1262 LAWYER REFERRAL (908)431-5544 LEGAL SERVICES (732)866-0020</p>
<p>CAMDEN COUNTY: Deputy Clerk of the Superior Court Civil Processing Office 1st Fl., Hall of Records 101 S. Fifth St. Camden, NJ 08103 LAWYER REFERRAL (856)964-4520 LEGAL SERVICE (856)964-2010</p>	<p>HUDSON COUNTY: Deputy Clerk of the Superior Court Superior Court, Civil Records Dept. Brennan Court House - 1st Fl. 583 Newark Avenue Jersey City, NJ 07306 LAWYER REFERRAL (201)798-2727 LEGAL SERVICES (201)792-6363</p>	<p>MORRIS COUNTY: Deputy Clerk of the Superior Court Civil Division 30 Schuyler Pl., P.O. Box 910 Morristown, NJ 07960-0910 LAWYER REFERRAL (201)267-5882 LEGAL SERVICES (973)285-6911</p>
<p>CAPE MAY COUNTY: Deputy Clerk of the Superior Court Central Processing Office 9 N. Main Street Box DN-209 Cape May Court House, NJ 08210 LAWYER REFERRAL (609)463-0313 LEGAL SERVICE (609)465-3001</p>	<p>HUNTERDON COUNTY: Deputy Clerk of the Superior Court Civil Division 65 Park Avenue Flemington, NJ 08862 LAWYER REFERRAL (908)735-2611 LEGAL SERVICES (609) 782-7979</p>	<p>OCEAN COUNTY: Deputy Clerk of the Superior Court Court House, Room 119 118 Washington Street Toms River, NJ 08754 LAWYER REFERRAL (732)240-3666 LEGAL SERVICES (732)341-2727</p>
<p>PASSAIC COUNTY: Deputy Clerk of the Superior Court Civil Division - Court House 77 Hamilton St. Paterson, NJ 07505 LAWYER REFERRAL (973)278-9223 LEGAL SERVICES (201)345-7171</p>	<p>SOMERSET COUNTY: Deputy Clerk of the Superior Court Civil Division Office New Court House, 3rd Fl. P.O. Box 3000 Somerville, NJ 08876 LAWYER REFERRAL (908)685-2323 LEGAL SERVICES (908)231-0840</p>	<p>UNION COUNTY: Deputy Clerk of the Superior Court 1st Fl., Court House 2 Broad Street Elizabeth, NJ 07207-6073 LAWYER REFERRAL (908)353-4715 LEGAL SERVICES (908)354-4340</p>
<p>SALEM COUNTY: Deputy Clerk of the Superior Court 92 Market St., P.O. Box 16 Salem, NJ 08079 LAWYER REFERRAL (856)678-8363 LEGAL SERVICES (609)451-0003</p>	<p>SUSSEX COUNTY: Deputy Clerk of the Superior Court Sussex County Judicial Center 43-47 High Street Newton, NJ 07860 LAWYER REFERRAL (973)267-5882 LEGAL SERVICES (973)363-7400</p>	<p>WARREN COUNTY: Deputy Clerk of the Superior Court Civil Division Office Court House Belvidere, NJ 07823-1500 LAWYER REFERRAL (908)267-5882 LEGAL SERVICES (908)475-2010</p>