

CAROLYN BAILEY

PLAINTIFF

-against-

ZUCKER, GOLDBERG & ACKERMAN, LLC;

(A New Jersey Law Firm)

MICHAEL S. ACKERMAN, ESQ.

In His Role As Managing Partner for
Zucker, Goldberg & Ackerman, LLC, And
In His Individual Capacity

JOHN DOES 1-100

DEFENDANTS

**SUPERIOR COURT OF NEW JERSEY
LAW DIVISION, ESSEX COUNTY**

Civil Action

DOCKET NO. ESX-L-8231-13

**PLAINTIFF'S CERTIFICATION
IN REPLY TO DEFENDANTS'
OPPOSITION TO MOTION
TO RECONSIDER**

(ORAL ARGUMENT REQUESTED)

I, CAROLYN BAILEY, hereby reply as follows to the above captioned matter, in my individual capacity, and in my role as a Private Attorney General, on behalf of the general and investing public, and the Clerks of the Courts of New Jersey. ("Plaintiff") I hereby enter my Reply to the Opposition filed by Defendants:

1. **What Plaintiff seeks is not ground-breaking, just the opportunity to amend her Complaint and have a jury of her peers fulfill its traditional role. Nothing more. Nothing less.**

2. In various filings, Plaintiff has clearly established the nature of newly discovered evidence supporting **RICO** counts. One noteworthy example is that on January 4, 2012 Defendants filed an Amended Complaint on Wells Fargo's behalf over two years **AFTER**

Defendants assigned Plaintiff's property to "US Bank National Association, as Trustee for Credit Suisse first Boston Mortgage Securities Corp., HEAT 2006-1", on October 19, 2009. The irony is that Defendants provided that clue to that new evidence in one of the documents their legal counsels filed during these proceedings !!! (See Exhibits A and B)

3. To the best of Plaintiff's knowledge, there are no New Jersey Court published or unpublished decisions addressing the issue of whether an Affidavit of Merit is required for a debt collector, or whether the role of debt collector trumps that of attorney. Nor has Plaintiff uncovered any New Jersey published or unpublished decision on whether and how a Pro Se Plaintiff can function as a Private Attorney General. That's all the more reason to permit those issues to proceed to trial. (See Exhibit C)

4. It bears pointing out that upon Plaintiff's repeated corrections, Defendants discontinued their protests regarding the statute of limitations. Upon service of an Amended Complaint, more pretenses will cease.

5. Defendant Zucker Goldberg seems on the verge of collapse. Should that happen, this Court's adverse rulings to Plaintiff will receive close and unwelcomed scrutiny by the general public, governmental/elected authorities, and the media. Just ask Harry M. Markopolos !

[Additional background material is provided on www.HurtingHomeOwners.com and www.Twitter.com/HurtinHomeOwner]

It is now up to this Court to determine whether justice will prevail.

WHEREFORE PLAINTIFF BESEECHES THIS COURT to grant Plaintiff permission to amend her Complaint to include **RICO** Counts relating to the "Sewer Service" of

Defendants' fraudulent January 4, 2012 Amended Complaint for Wells Fargo Bank, Wells Fargo/Defendants "Ta-Da" "Corrective" Assignment, Defendants' role as debt collectors, and to address other related and relevant issues.

I further **BESEECH THIS COURT** to ascertain the proper sanction(s) to deter the New Jersey attorneys associated with Defendant Zucker Goldberg, and also the New Jersey attorneys associated with their legal counsel Connelly Foley, from intentionally and flagrantly attempting to mislead this Court.

I hereby respectfully serve Notice of my intent to appeal in the event that the Motion to Reconsider is denied.

Pursuant to R. 1:6-2(d), the undersigned requests oral argument for reasons contained within the July 9, 2014 Motion to Reconsider.

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

Date: July 21, 2014

Signature: _____

Carolyn Bailey, Plaintiff and Private Attorney General

CERTIFICATION OF SERVICE

I certify that on July 21, 2014 I sent a copy of Plaintiff's Reply to Defendants' Opposition to Motion To Reconsider, to Andrew C. Sayles, Esq. and Steven A. Kroll, Esq., the Attorneys for the Defendants, by certified mail:

Andrew C. Sayles, Esq.
Steven A. Kroll, Esq.
Connell Foley LLP
85 Livingston Avenue
Roseland, New Jersey 07068

Certified mail # 7012 3050 0001 5762 2889

Date: July 21, 2014

Signature: _____

Carolyn Bailey, Plaintiff and Private Attorney General