

At an Ex Parte _____ of the Supreme
Court held in and for the County of
KINGS, State of New York
on the _____ day of _____, 2017.

PRESENT: HON. _____ J.S.C.

STATE OF NEW YORK
SUPREME COURT COUNTY OF KINGS

REVERSE MORTGAGE SOLUTIONS, INC.,

ORDER TO EXTEND
TIME FOR PUBLICATION

Plaintiff,

-VS-

RONALD PAYNE, THE HEIRS AT LARGE OF HATTIE
PAYNE, DECEASED, and all persons who are husbands,
widows, grantees, mortgagees, lienors, heirs, devisees,
distributees, successors in interest of such of them as may
be dead, and their husbands and wives, heirs, devisees,
distributees and successors of interest of all of whom and
whose names and places are unknown to Plaintiff; THE
HEIRS AT LARGE OF ALFONSO PETTUS, DECEASED,
and all persons who are husbands, widows, grantees, mortgagees,
lienors, heirs, devisees, distributees, successors in interest of such
of them as may be dead, and their husbands and wives, heirs,
devisees, distributees and successors of interest of all of whom
and whose names and places are unknown to Plaintiff;
VERNELLE MANNING; SECRETARY OF HOUSING AND URBAN
DEVELOPMENT; CITY OF NEW YORK
DEPARTMENT OF TRANSPORTATION PARKING
VIOLATIONS BUREAU; UNITED STATES OF AMERICA; NEW
YORK STATE DEPARTMENT OF TAXATION AND FINANCE;
"JOHN DOE" AND "JANE DOE" said
names being fictitious, it being the intention of
Plaintiff to designate any and all occupants of premises
being foreclosed herein,

Index No. 509415/2015

Defendants.

Plaintiff, by its attorneys, Fein, Such & Crane, LLP, Mark K. Broyles, Esq., of counsel, having duly moved for an Order extending the time to serve Defendant(s) pursuant to CPLR 306-b and on the filing of the Affirmation by Mark K. Broyles, Esq., in support thereof, dated September ____, 2017, and having due deliberation thereon,

NOW, on motion of Fein, Such & Crane, LLP, attorneys for Plaintiff, it is

ORDERED, that the motion is granted, and it is further,

ORDERED, that the 30-day time period in which to begin publication of the supplemental summons be extended to allow the plaintiff to complete publication upon the supplemental summons and amended complaint with 30 days to commence upon entry of this order.

Dated:

ENTER,

HON.

Supreme Court Justice

STATE OF NEW YORK
SUPREME COURT COUNTY OF KINGS

REVERSE MORTGAGE SOLUTIONS, INC.,

Plaintiff,

ATTORNEY
AFFIRMATION

-VS-

RONALD PAYNE, THE HEIRS AT LARGE OF HATTIE PAYNE, DECEASED, and all persons who are husbands, widows, grantees, mortgagees, lienors, heirs, devisees, distributees, successors in interest of such of them as may be dead, and their husbands and wives, heirs, devisees, distributees and successors of interest of all of whom and whose names and places are unknown to Plaintiff; THE HEIRS AT LARGE OF ALFONSO PETTUS, DECEASED, and all persons who are husbands, widows, grantees, mortgagees, lienors, heirs, devisees, distributees, successors in interest of such of them as may be dead, and their husbands and wives, heirs, devisees, distributees and successors of interest of all of whom and whose names and places are unknown to Plaintiff; VERNELLE MANNING; SECRETARY OF HOUSING AND URBAN DEVELOPMENT; CITY OF NEW YORK DEPARTMENT OF TRANSPORTATION PARKING VIOLATIONS BUREAU; UNITED STATES OF AMERICA; NEW YORK STATE DEPARTMENT OF TAXATION AND FINANCE; "JOHN DOE" AND "JANE DOE" said names being fictitious, it being the intention of Plaintiff to designate any and all occupants of premises being foreclosed herein,

Index No. 509415/2015

Defendants.

Mark K. Broyles, an attorney duly admitted to practice law in the State of New York, affirms the following to be true under the penalties of perjury:

1) I am one of the attorneys for Plaintiff in the above-captioned action and I am fully familiar with the facts and circumstances herein.

2) This Affirmation is submitted in support of Plaintiff's instant Motion to Extend the Time for Publication pursuant to CPLR § 316-c.

3) This action was commenced with the filing of a Summons and Complaint on July 31, 2015. That the Supplemental Summons and Amended Complaint were filed on August 10, 2017. To date, publication of the supplemental summons and amended complaint has not been effected. A copy of the Supplemental Summons and Amended Complaint are attached hereto as **Exhibit "A"**.

4) Order for Service by Publication was granted on June 28, 2017. The Order for Service by Publication was entered in KINGS County Clerk's Office on July 24, 2017. To date, publication has not commenced. The 30-day time period in which to begin publication has elapsed. A copy of the Order for Service by Publication is attached hereto as **Exhibit "B"**.

5) Due to the extensive cost of publication, pre-approval was needed from the Plaintiff in order for Plaintiff's attorney to commence publication.

6) Additional fees were requested from the Plaintiff on August 14, 2017.

7) Said fees were approved on September 6, 2017, allowing Plaintiff's attorney to begin publication.

8) Based on the foregoing, Plaintiff has respectfully submitted good cause why the Court should extend the time for service in this action.

9) That an additional leave is also sought to extend the 30-day time period from the date of entry of this order to proceed with publication of the supplemental summons and amended complaint under CPLR §316-c for a sufficient period of time to effectuate publication.

WHEREFORE, Plaintiff respectfully requests an Order of this Court: (1) granting its Motion to Extend the Time for Publication; (2) extending the time for publication until 30 days from the entry of this Order; and (3) directing Defendant to interpose an Answer within twenty days of the Court's Order.

Dated: September 14 2017



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