

This is an account summary. It is not a credit card statement from the originating creditor and has not previously been provided to the consumer.

Account Number: XXXXXXXXXXXX4788
Internal Account Identifier: 151250041
Portfolio ID: 6073

Current Owner: New Century Financial Services Inc.
Original Creditor: General Electric Capital Corporation
Previous Owner: Sherman Acquisition, L.L.C.
Summary Closing Date: 09/28/2012
Acquisition Date: 12/22/2005
Account Origination Date: 12/23/2001
Last Payment Date: 06/27/2006

	Account number		XXXXXXXXXXXX4788	
	Owing	Collected	Balance	
NATALIE FREEMAN	\$ 864.13	\$ 144.02	\$ 720.11	
	\$ 272.45	\$ -	\$ 272.45	
271 CHAPEL AVE # 2	\$ -	\$ -	\$ -	
JERSEY CITY, NJ 07305	\$ -	\$ -	\$ -	
New Balance	\$ 1,136.58	\$ 144.02	\$ 992.56	

PAYMENT TRANSACTIONS

Transaction Date	Description	Amount
06/27/2006	Payment	\$ 144.02

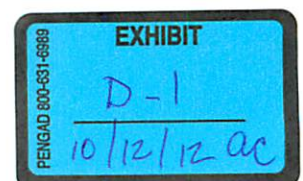
This is not from the original creditor and has not been previously provided to the customer.

This is an account summary. It is not a credit card statement. This summary has been generated on behalf of New Century Financial Services Inc., account owner.

This communication is from a debt collector and this is an attempt to collect a debt. Any information obtained will be used for that purpose.

El objeto de la presente notificación es gestionar el cobro de la deuda, y toda información obtenida será utilizada a tal fin. La presente comunicación proviene de un agente de cobro de deudas.

Because interest, payments, credits, fees, and/or other permissible charges can continue to cause your account balance to vary from day to day, please contact us at 1-888-665-0374 to obtain up-to-date balance information.



UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY



_____	:	
NATALIE A. WILLIAMS, et al.	:	
	:	Civil Action No. 11-7296 (KSH)
Plaintiffs,	:	
	:	
v.	:	
	:	
PRESSLER AND PRESSLER LLP,	:	ORDER ON INFORMAL
	:	APPLICATION
Defendant.	:	
_____	:	

This matter having come before the Court by way of submission dated July 2, 2012; and the Court having considered the submission, claims, defenses, the record of proceedings, and governing law;

and for the reasons set forth in the Opinion delivered on the record on July 3, 2012;¹

IT IS ON THE 3rd day of July, 2012

ORDERED that, with respect to Plaintiffs' Interrogatories Nos. 10 and 11, no later than **July 13, 2012**, the defendant shall provide the plaintiffs with the name(s) of the Rule 30(b)(6) witness(es) who can testify about the creation of the "settlement letter" that plaintiffs and the putative class received, its purpose, and who approved its language, as well as who approves to whom such a letter is sent, and what factors are considered and what type of information is reviewed in deciding when to send such a letter. No later than **July 13, 2012**, the defendant shall provide a date for such witness(es) to appear for a Rule 30(b)(6) deposition to testify about these subjects. No other written response is required;

¹A copy of the Opinion may be obtained by contacting King Transcription Services at (973) 237-6080.

IT IS FURTHER ORDERED that, with respect to Plaintiffs' Interrogatories Nos. 12 and 13, no later than **July 13, 2012**, the defendant shall provide the plaintiffs with the defendants net worth and the name of the Rule 30(b)(6) witness who can testify about it. The response shall be for counsel's eyes only and may only be used for the purpose of this litigation;

IT IS FURTHER ORDERED that, with respect to Plaintiffs' Interrogatory Nos. 18 and Requests for Production Nos. 14 and 15 , no further response is required absent a showing that the sworn response to interrogatory No. 12 is inaccurate;

IT IS FURTHER ORDERED that, with respect to Plaintiffs' Interrogatories Nos. 21, 22, and 23, no later than July 13, 2012, the defendant shall provide the plaintiffs with the number of Complaints Ralph Gulko signed on December 17, 2010, and signed from December 13, 2010 through December 17, 2010, that were ultimately filed in New Jersey courts. Complaints that were not filed should not be included in these figures. No further response will be required;

IT IS FURTHER ORDERED that, with respect to Plaintiffs' Interrogatory No. 24, no further response is required;

IT IS FURTHER ORDERED that, with respect to Plaintiffs' Request for the Production of Documents No. 8, no later than **July 13, 2012**, the defendant shall provide the plaintiff with copies of audio recordings of the named plaintiffs in their possession, custody or control;

IT IS FURTHER ORDERED that, with respect to Plaintiffs' Request for the Production of Documents No. 9, in accordance with the defendant's agreement to do so, as reflected on ECF No. 18 at 7, no later than **July 13, 2012**, the defendant shall provide a certification that states that a diligent search was conducted for documents embodying policies/practices/procedures concerning the "settlement" letter of the type sent to the plaintiff but none have been found, or produce such documents; and

IT IS FURTHER ORDERED that, with respect to Plaintiffs' Request for the Production of Documents No. 16, no later than **July 13, 2012**, the defendant shall produce: (1) all nonprivileged documents from its collection files for each named plaintiff; and (2) if any documents are withheld based upon the assertion of the attorney-client privilege or work product rule, a log identifying such documents in accordance with the requirements of L. Civ. R. 34.1.

s/Patty Shwartz
UNITED STATES MAGISTRATE JUDGE

MAURICE H. PRESSLER(1930-2002)
SHELDON H. PRESSLER

GERARD J. FELT
STEVEN P. MCCABE
LAWRENCE J. MCDERMOTT, JR.

MITCHELL L. WILLIAMSON
THOMAS M. BROGAN
RALPH GULKO
JOANNE L. D'AURIZIO
CHRISTOPHER P. ODOGBILI

PRESSLER AND PRESSLER, L.L.P.

COUNSELLORS AT LAW
7 Entin Road
Parsippany, NJ 07054-5020
Off: (973) 753-5100
Fax: (973) 753-5353

NY Office

305 Broadway
9th Floor
New York, NY 10007
Off: (516)222-7929
Fax: (973)753-5353

Reply to [X] NJ Office [] NY Office

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CRAIG S. STILLER*
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LESLIE L. PHIEFER

DARYL J. KIPNIS
DARREN H. TANAKA
MITCHELL E. ZIPKIN
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OFFICE HOURS:
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Friday: 8am-7pm
Saturday: 9am-2pm



NATALIE FREEMAN
271 CHAPEL AVE APT 2
JERSEY CITY, NJ 073052911

11/01/10
P&P FILE F96305
Amount of Debt \$720.11

Dear NATALIE FREEMAN

This is to notify you that your account with GE CAPITAL - REGULAR WAL-MART , account # C77W03423244788 has been purchased by NEW CENTURY FINANCIAL SERVICES, INC. and has been placed with the firm of Pressler and Pressler, LLP for collection.

We shall afford you this opportunity to pay this debt immediately and avoid further action against you. Make your check or money order payable to Pressler and Pressler, LLP and include your File Number F96305 and remit to:

Pressler and Pressler, LLP 7 Entin Rd. Parsippany, NJ 07054-5020

Payment can be made on the website www.paypressler.com. We also accept Visa/Mastercard and American Express. If you choose this payment option return this letter along with:

Name as it appears on Credit Card _____/Street # & Zip _____
Expires ____/____ Credit Card # _____/Security Code _____
Amount \$ _____ Signature _____

Should you have any questions, please feel free to contact me at 1-888-312-8600 Ext 5368 or anyone in my department at Ext 5105.

Thank You, KEVIN V - Paralegal Ext 5368

At this time, no attorney with this firm has personally reviewed the particular circumstances of your account. However, if you fail to contact this office, our client may consider additional remedies to recover the balance due.

PLEASE READ THE FOLLOWING PROVIDED TO YOU PURSUANT TO FEDERAL STATUTE:

This communication is from a debt collector. This is an attempt to collect a debt. Any information obtained will be used for that purpose. Unless you notify this office within 30 days after receipt of this notice that you dispute the validity of the debt, or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receipt of this notice that the debt or any portion thereof is disputed, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. Upon your request in writing, within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.



MAURICE H. PRESSLER (1930-2002)
SHELDON H. PRESSLER

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LAWRENCE J. McDERMOTT, JR.

MITCHELL L. WILLIAMSON
THOMAS M. BROGAN
RALPH GULKO
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PRESSLER AND PRESSLER, L.L.P.

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Parsippany, NJ 07054-5020
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GINA M. LO BUE

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Friday: 8am-7pm
Saturday: 9am-2pm



ALAN J SETNESKA
153 HICKORY CORNER RD
EAST WINDSOR, NJ 08520

04/14/11
P&P FILE S258431
Amount of the Debt \$15,219.30

Dear ALAN J SETNESKA

This is to notify you that your account with CITIBANK SOUTH DAKOTA, N.A. , account # 5121079640375975 has been purchased by NEW CENTURY FINANCIAL SERVICES, INC. and has been placed with the firm of Pressler and Pressler, LLP for collection.

We shall afford you this opportunity to pay this debt immediately and avoid further action against you. Make your check or money order payable to Pressler and Pressler, LLP and include your File Number S258431 and remit to:

Pressler and Pressler, LLP 7 Entin Rd. Parsippany, NJ 07054-5020

Payment can be made on the website www.paypressler.com. We also accept Visa/MasterCard and American Express. If you choose this payment option return this letter along with:

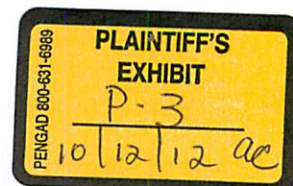
Name as it appears on Credit Card _____
Street # & Zip _____ Expires ____/____
Credit Card # _____ /Security Code _____
Amount \$ _____
Signature _____

If you are unable to pay the balance in full and would like to discuss payment arrangements, please contact us at (888) 312-8600.

At this time, no attorney with this firm has personally reviewed the particular circumstances of your account. However, if you fail to contact this office, our client may consider additional remedies to recover the balance due.

PLEASE READ THE FOLLOWING PROVIDED TO YOU PURSUANT TO FEDERAL STATUTE:

This communication is from a debt collector. This is an attempt to collect a debt. Any information obtained will be used for that purpose. Unless you notify this office within 30 days after receipt of this notice that you dispute the validity of the debt, or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receipt of this notice that the debt or any portion thereof is disputed, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. Upon your request in writing, within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.



MAURICE H. PRESSLER (1930-2002)
SHELDON H. PRESSLER

PRESSLER AND PRESSLER, L.L.P.

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Saturday: 9am-2pm

01/12/11



NATALIE FREEMAN
271 CHAPEL AVE APT 2
JERSEY CITY, NJ 073052911

P&P FILE #: F96305

Re: NEW CENTURY FINANCIAL SERVICES, INC. v. NATALIE FREEMAN
Docket # DC-031425-10
Superior Court of New Jersey: Law Division HUDSON Special Civil Part

Dear NATALIE FREEMAN :

You are hereby offered a significant savings on your GE CAPITAL - REGULAR WAL-MART account C77W03423244788 now owned by NEW CENTURY FINANCIAL SERVICES, INC. . As you probably know, this office has filed a lawsuit against you in which the amount claimed is \$790.58 . This includes costs and other amounts the creditor is seeking. If you can make a payment of \$592.94 , 75 % of the amount claimed by Tuesday, January 25, 2011 , it will be accepted as payment in full, a savings to you of \$197.64 from the amount claimed in the lawsuit.

This payment will satisfy the pending lawsuit. Proof that the debt has been paid will be sent to the court and a copy to you so that you can advise the credit bureau. If you are unable to pay the 75 %, we can accept \$197.65 down (25 % of the full balance) and enter into acceptable arrangements on the remaining 75 % when you call this office.

If there are any special circumstances that need to be considered or you wish to pay by phone, please call the office toll free at 1-888-312-8600 Ext 5368 or anyone in my department at 5105 . Mail your check payable to NEW CENTURY FINANCIAL SERVICES, INC. , write file number F96305 and enclose in the postage paid envelope or complete the credit card authorization form at the bottom of this letter. You must act swiftly to accept these offers. **Please Note:** After January 25, 2011 this offer may be null and void. We are not obligated to renew this offer. This offer does not apply to payments or arrangements to pay made prior to this notification.

Thank you, KEVIN V - Paralegal EXT - 5368

For faster processing, pay by phone using a check, credit card (MasterCard, Visa or American Express) or debit card with a Visa or MasterCard logo. Payments can also be made on our website www.paypressler.com, or by Western Union. Please call them at 1-800-325-6000 for the nearest agent and mention code city: (Pressler, State: NJ).

Name as it appears on Credit Card _____ /Street # & Zip _____
Expires ____/____ Credit Card # _____ /Security Code _____
Amount \$ _____ Signature _____

THIS COMMUNICATION IS FROM A DEBT COLLECTOR.



MAURICE H. PRESSLER(1930-2002)
SHELDON H. PRESSLER

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LAWRENCE J. McDERMOTT, JR.

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09/07/11

ALAN J SETNESKA
153 HICKORY CORNER RD
EAST WINDSOR, NJ 085202417

P&P FILE #: S258431
Docket # L -001502-11

Re: NEW CENTURY FINANCIAL SERVICES, INC. v. ALAN J SETNESKA
Superior Court of New Jersey: Law Division MERCER County

Dear ALAN J SETNESKA :

You are hereby offered a significant savings on your CITIBANK SOUTH DAKOTA, N.A. account 5121079640375975 now owned by NEW CENTURY FINANCIAL SERVICES, INC. . As you probably know, this office has filed a lawsuit against you in which the amount claimed is \$15,498.44 . This includes costs and other amounts the creditor is seeking. If you can make a payment of \$12,398.75 , 80 % of the amount claimed by Thursday, September 22, 2011 , it will be accepted as settlement in full, a savings to you of \$3,099.69 from the amount claimed in the lawsuit.

This payment will satisfy the pending lawsuit. Proof that the debt has been paid will be sent to the court and a copy to you so that you can advise the credit bureau. If you are unable to pay the 80 %, we can accept \$3,874.61 down (25 % of the full balance) and enter into acceptable arrangements on the remaining 75 % when you call this office.

If there are any special circumstances that need to be considered or you wish to pay by phone, please call the office toll free at 1-888-312-8600 Ext 5105 . Mail your check payable to NEW CENTURY FINANCIAL SERVICES, INC. , write file number S258431 and enclose in the postage paid envelope or complete the credit card authorization form at the bottom of this letter. You must act swiftly to accept these offers. **Please Note:** After September 22, 2011 this offer may be null and void. We are not obligated to renew this offer. This offer does not apply to payments or arrangements to pay made prior to this notification.

For faster processing, pay by phone using a check, credit card (MasterCard, Visa or American Express) or debit card with a Visa or MasterCard logo. Payments can also be made on our website www.paypressler.com, or by Western Union. Please call them at 1-800-325-6000 for the nearest agent and mention code city: (Pressler, State: NJ).

Name as it appears on Credit Card _____/Street # & Zip _____
Expires ____/____ Credit Card # _____/Security Code _____
Amount \$ _____ Signature _____

THIS COMMUNICATION IS FROM A DEBT COLLECTOR.



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY (Newark)

=====	:	
	:	
NATALIE A. WILLIAMS individually,	:	2:11-cv-07296 (KSH)(PS)
and on behalf of all others similarly	:	
situated	:	
	:	
Plaintiff	:	
	:	
vs.	:	AFFIDAVIT OF
	:	MARKO GALIC
PRESSLER & PRESSLER, LLP,	:	
	:	
Defendant	:	
	:	
=====	:	

State of New Jersey:
 : SS
County of Morris :

I, Marko Galic, of full age and under oath do state:

- I am the Business Development Manager for New Century Financial Services, Inc. ("NCFSI") and am familiar with its books, records and recordkeeping procedures. I make this affidavit based on my personal knowledge and on a review of NCFSI's books and records. I am authorized to offer this Affidavit.
- NCFSI is a buyer of distressed debt. Through its agents it purchases portfolios of defaulted credit card and other accounts either directly or indirectly from the original credit issuer(s).
- Upon acquisition, it is NCFSI's normal course of business to refer accounts where the account holder resides in New Jersey to NCFSI's collection counsel, Pressler and Pressler, L.L.P., to initiate collection activity. Other than through its said counsel, NCFSI does not routinely conduct independent collection activity or communicate with debtors or anyone on their behalf. (With the exception that we send the yearly notice required under the Gramm Leach Bliley Act.)
- On or about October 26, 2010 NCFSI acquired a portfolio of defaulted accounts from Sherman Acquisition, LLC ("Sherman") which included an account in the name of the instant Plaintiff, Natalie Freeman, the name utilized by Plaintiff to obtain the account in issue.

PENGAD 800-631-6689
PLAINTIFF'S EXHIBIT
 P-6
 10/12/12 ac

5. It is my understanding that a lawsuit was thereafter filed on December 17, 2010 entitled New Centurv Financial Services, Inc. v Natalie Freeman, in the Superior Court of New Jersey, Hudson County, Law Division, Special Civil Part, docket no. DC-031425-10 and that subsequent to service of the complaint an answer was filed by Ms. Freeman.

6. During the litigation NCFSI was advised that Ms. Freeman would qualify as a hardship case and based on that fact and the small amount in controversy a business decision was made to dismiss the case. It is my understanding that the aforementioned lawsuit was dismissed with prejudice on June 3 2011.

7. NCFSI reports to the three (3) major credit bureaus (Transunion, Equifax and Experian) once a month on the 1st of the month.

8. After we have owned the account for 60 days, we first report the account. We have certain basic criteria which must be met before an account is reported, such as amount due, address that is in the country, cannot be disputed, bankrupt, deceased or if in suit have an answer filed. Only the primary account holder will be reported.

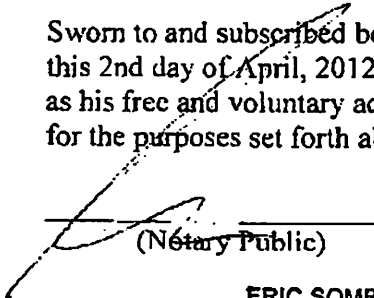
9. There are only three (3) codes our company reports: Code 93 (assigned to collections), Code 62 (Paid in Full), or Code DA (to Delete).

10. If an account falls outside of our reporting criteria after it has been reported, we immediately delete our trade line on the next reporting cycle.

11. We also have signed up for an online service called E-OSCAR, which allows us to receive disputes and updates on a daily basis from all 3 credit bureaus.


Marko Galic

Sworn to and subscribed before me
this 2nd day of April, 2012
as his free and voluntary act and deed
for the purposes set forth above.


(Notary Public)

ERIC SOMBERS
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES JUNE 24, 2012

MAURICE H. PRESSLER (1930-2002)
SHELDON H. PRESSLER

GERARD J. FELT
STEVEN P. MCCABE
LAWRENCE J. McDERMOTT, JR.

MITCHELL L. WILLIAMSON (NJ & NY)
FRANCIS X. GRIMES (NJ & PA)
CAPREN H. TANAKA (NJ & NY)
JOANNE L. D'AURIZIO (DC, PD, NJ & NY)
MITCHELL R. ZIPKIN (NJ & NY)
CRAIG S. STILLER (NY ONLY)

PRESSLER AND PRESSLER, L.L.P.

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FAX: (973) 753-5353

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Fax: (212) 753-5153

PA Office
804 West Avenue
Jenkintown, PA 19046
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Fax: (215) 576-7299

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PATRICIA B. SULLIVAN
DALE L. GELBER
GINA M. LO SUE (NJ & NY)
EDWARD STOCK (PA ONLY)
NICHOLAS J. MADONIA
CHRISTOPHER P. COCCOBI
RALPH GURKO (NJ, NY & PA)

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STEVEN DANG

OFFICE HOURS:
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Saturday: 9am-7pm

01/26/12

HUDSON Special Civil Part
SPECIAL CIVIL CASE MGMT OFFICE
595 NEWARK AVE, ROOM 711
JERSEY CITY, NJ 07306

Re: NEW CENTURY FINANCIAL SERVICES, INC. vs [REDACTED]

Superior Court of New Jersey: Law Division
HUDSON Special Civil Part
Docket Number [REDACTED]
P&P File No [REDACTED]
Balance \$667.37

TEAM B FEE: NO FEE ITEM

Dear Clerk:

The above captioned matter is currently scheduled for trial on Friday, January 27, 2012.

Please mark the case settled. The Stipulation of Settlement has been forwarded to our adversary for signature. Upon receipt of a fully executed Stipulation of Settlement, it will be forwarded to the Court for filing.

Thank you for your attention to this matter.

Very truly yours,

PRESSLER and PRESSLER, LLP

S/ DARREN H. TANAKA
DARREN H. TANAKA

cc: [REDACTED]
[REDACTED]
[REDACTED]



MAURICE H. PRESSLER (1926-2007)
SHELDON H. PRESSLER

GERARDO J. FELT
STEVEN P. MCCAGH
LAWRENCE J. McDERMOTT, JR.

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FRANCIS K. GRIMES (NJ & PA)
DAPHNE H. TANAKA (NJ & NY)
ROBERT L. D'AURIZIO (DC, FL, NJ & NY)
MITCHELL E. SIPKIN (NJ & NY)
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COUNSELLORS AT LAW
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NY Office
335 Broadway
9th Floor
New York, NY 10007
Off: (516) 222-7929
Fax: (913) 753-5353
Apply to (X) NJ Office | NY Office | PA Office

PA Office
804 West Avenue
Johnstown, PA 15046
Off: (717) 576-1900
Fax: (717) 576-7299

DANIEL B. SULLIVAN
DALE L. GELBER
JINA M. LO BUE (NJ & NY)
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01/27/12

Re: NEW CENTURY FINANCIAL SERVICES, INC. vs. [REDACTED]
Superior Court of New Jersey: Law Division
HUDSON Special Civil Part
Docket No. [REDACTED]
P&P FILE NO [REDACTED]

Dear [REDACTED]

Enclosed please find original and two (2) copies of the Stipulation of Settlement.

Kindly sign the original and a copy where indicated by the "X". Return them by return mail in the postage-paid envelope so that we may file it with the Court.

The immediate return is necessary even though your payment may not be due until a future date; Wednesday, February 01, 2012. If you fail to immediately return the Stipulation of Settlement, we will have to continue with our collection efforts.

Please keep the last copy for your records.

Very truly yours,

PRESSLER and PRESSLER, LLP

S/Rita E. Ayoub

Rita E. Ayoub

Enclosures

THIS COMMUNICATION IS FROM A DEBT COLLECTOR.



[REDACTED]
[REDACTED]
[REDACTED]

PRESSLER AND PRESSLER, L.L.P.

COUNSELLORS AT LAW

7 Entin Rd.

Parsippany, NJ 07054-5020

(973) 757-5100

Attorney for Plaintiff

NEW CENTURY FINANCIAL SERVICES, INC.

Plaintiff

vs.

[REDACTED]
Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION:

HUDSON Special Civil Part
Docket No. [REDACTED]

CIVIL ACTION

STIPULATION OF SETTLEMENT

Dated: 01/26/12

It is hereby stipulated and agreed that this case be settled upon the following terms:

The defendant(s) shall pay to Pressler and Pressler, L.L.P, attorneys for Plaintiff the sum of \$400.00 (Settlement) to be paid at the rate of \$100.00 per month beginning 02/01/12 due on or before the 1st of each month thereafter until the balance is paid in full. If default, plaintiff will proceed and enforce the full original amount which is now \$667.37 plus interest less credit given for any payments made. Once this matter has been settled in full, we will file a Stipulation of Dismissal with the court and will provide the defendant with a settled in full letter referencing the original creditor and account number.

The case in the meantime to be marked "settled".

In the event of default under the terms of this settlement, the plaintiff may, on 5 days written notice, accompanied by a Certification showing the balance still due, move for an Order for the entry of judgment, and the defendant(s) consent to the entry of judgment, for the amount stated to be due in the Certification, unless the same is disputed by presentation of a Certification to the Court by the defendant(s). Notices to enforce shall be served upon the defendant(s) at the address below. Any change of address shall be on written notice to Attorneys for Plaintiff.

PRESSLER and PRESSLER, LLP

BY S/Rita E. Ayoub

Rita E. Ayoub

Attorneys for Plaintiff

02 / ___ /12 X

Dated: [REDACTED]

[REDACTED]

P&P FILE NO [REDACTED]

TEAM B FEE: NO FEE ITEM

PRESSLER and PRESSLER, LLP
Counsellors At Law
7 Entin Rd.
Parsippany, NJ 07054-5020
1-973-753-5100

Attorneys for Plaintiff

Plaintiff

LVNV FUNDING LLC

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
HUDSON Special Civil Part
DOCKET NO [REDACTED]

vs.

CIVIL ACTION

Defendant(s)

WARRANT FOR SATISFACTION
OF JUDGMENT

[REDACTED]

TO THE CLERK OF THIS COURT:

You are hereby directed to satisfy of record, the judgment in the above matter.

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.

Dated: 04/03/12

PRESSLER and PRESSLER, LLP
Attorneys for Plaintiff

By: S/Rita E. Ayoub
Rita E. Ayoub

MAURICE H. PRESSLER (1930-2002)
SHELDON H. PRESSLER

GERARD J. FELT
STEVEN P. McCABE
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MITCHELL L. WILLIAMSON (NJ & NY)
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RALPH GULKO (NJ, NY & PA)

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Jenkintown, PA 19046
Office (215) 579-1900
Fax: (215) 576-7299

E-MAIL: Pressler@Pressler-Pressler.com

Please Reply To:

New Jersey Office New York Office Pennsylvania Office

DANIEL B. SULLIVAN
DALE L. GELBER
GINA M. LO BUE (NJ & NY)
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OFFICE HOURS:

Monday-Thursday: 8am-5pm

Friday: 8am-7pm

Saturday: 9am-2pm

APRIL 2, 2012

Philip D. Stern & Associates, LLC
Attorneys at Law
697 Valley Street, Suite 2d
Maplewood, NJ 07040

Re: Natalie A. Williams vs Pressler & Pressler, LLP
United States Court for the District of New Jersey (Newark)
Civil Case Number: 2:11-cv-07296 (KSH)(PS)
P&P File Number P151618

Dear Mr. Stern:

As discussed in chambers during our conference on March 26, 2012, annexed hereto are the Affidavits of Ralph Gulko, Esq. detailing what are his procedures prior to approving a summons and complaint for filing with the court and the Affidavit of Marko Galic, a representative of New Century Financial Services, Inc. ("NCFSI") regarding NCFSI's policies regarding reporting accounts to the credit bureaus. I have also enclosed a copy of the documents sent to court when a matter is settled.

Very truly yours,
PRESSLER & PRESSLER, LLP

s/Mitchell L. Williamson

Mitchell L. Williamson

MLW/MW

Hon Patty Shwartz, U.S.M.J.
U.S. P.O. Courtroom 10
U.S. Courthouse
50 Walnut Street
Newark, N.J. 07101



**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY (Newark)**

=====	:	
	:	
NATALIE A. WILLIAMS individually,	:	2:11-cv-07296 (KSH)(PS)
and on behalf of all others similarly	:	
situated	:	
	:	
Plaintiff	:	
	:	
vs.	:	AFFIDAVIT OF
	:	RALPH GULKO, ESQ.
PRESSLER & PRESSLER, LLP,	:	
	:	
Defendant	:	
	:	
=====	:	

State of New Jersey:
 : SS
County of Morris :

I, Ralph Gulko, Esq., of full age and under oath do state:

1. I am a practicing attorney at law in the States of New Jersey, New York and Pennsylvania. New Jersey since December 1978, Pennsylvania since December 1980 and New York since November 1996. . Since August 2005 I have been associated with the New Jersey law firm of Pressler and Pressler, LLP. ("Pressler") with offices located at 7 Entin Road, Parsippany, New Jersey, attorneys for Defendant Pressler. Prior to my association with Pressler, I was a partner with the New Jersey law firm of Eichenbaum, Kantrowitz, Leff and Gulko, ("EKLG") which specialized in retail collections. I was with EKLG from May 1980 through August 2005. I am familiar with the facts of this case and the underlying matter and I make the following statements from personal knowledge and a review of Pressler's files.
2. When new retail consumer collection claims are received by Pressler from their clients, the first step is to send the "Initial Notice letter" pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. §1692 ("FDCPA") to the named account holder(s).
3. After thirty five (35) days if no disputes are received and/or the Initial Notice letter is not returned as undeliverable, the claim is prepared for suit.
4. The proposed complaints are then reviewed for their service and filing.

5. I review each proposed complaint in its entirety. I make sure all information contained in the Summons and Complaint ("SAC") is the same information that was received by the client. I also review the file notes on the account to ascertain whether there have been any changes in that information due to post-referral credits and/or address changes.

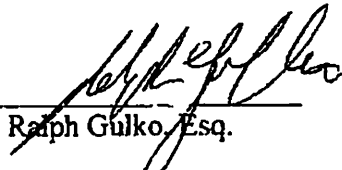
6. I further review the account to confirm all changes are current. If there are other accounts for the debtor I will check those claims and look at any documents related to that claim. I further check for any credit reports that have been obtained to confirm correct and updated information.

7. If documents are to be attached to the SAC, such as a medical bill, I review those to be sure the document(s) is(are) the correct one to use, and that all private information has been redacted.

8. Generally, the SAC must be correct in all respects in order to be approved. This includes name, address, county of venue, amount, the cause of action alleged in the body of the complaint, the statute of limitations, and anything else that would give me any cause or reason to reject the SAC.

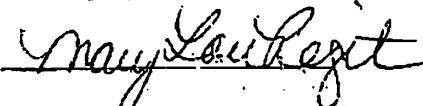
9. I look to see if there is any reason to reject it, such as an intervening bankruptcy filing. Even a late payment will cause me to reject it for purposes of redoing the SAC to reflect the new and now lower balance.

10. Finally if the SAC is "good" I approve it for filing. If I find what I perceive to be a "problem" I return it to the originating department for review with my reasons for rejection.

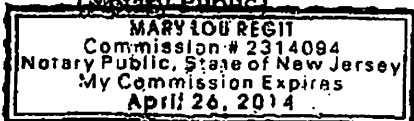


Ralph Gulko, Esq.

Sworn to and subscribed before me
this 2nd day of April, 2012
as his free and voluntary act and deed
for the purposes set forth above.



(Notary Public)



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY (Newark)

===== :
 :
NATALIE A. WILLIAMS individually, :
and on behalf of all others similarly :
situated :
 :
 Plaintiff :
 :
 vs. :
 :
PRESSLER & PRESSLER, LLP, :
 :
 Defendant :
 :
 ===== :

2:11-cv-07296 (KSH)(PS)

**AFFIDAVIT OF
MARKO GALIC**

State of New Jersey :
: SS
County of Morris :

I, Marko Galic, of full age and under oath do state:

1. I am the Business Development Manager for New Century Financial Services, Inc. ("NCFSI") and am familiar with its books, records and recordkeeping procedures. I make this affidavit based on my personal knowledge and on a review of NCFSI's books and records. I am authorized to offer this Affidavit.
2. NCFSI is a buyer of distressed debt. Through its agents it purchases portfolios of defaulted credit card and other accounts either directly or indirectly from the original credit issuer(s).
3. Upon acquisition, it is NCFSI's normal course of business to refer accounts where the account holder resides in New Jersey to NCFSI's collection counsel, Pressler and Pressler, L.L.P., to initiate collection activity. Other than through its said counsel, NCFSI does not routinely conduct independent collection activity or communicate with debtors or anyone on their behalf. (With the exception that we send the yearly notice required under the Gramm Leach Bliley Act.)
4. On or about October 26, 2010 NCFSI acquired a portfolio of defaulted accounts from Sherman Acquisition, LLC ("Sherman") which included an account in the name of the instant Plaintiff, Natalie Freeman, the name utilized by Plaintiff to obtain the account in issue.

5. It is my understanding that a lawsuit was thereafter filed on December 17, 2010 entitled New Century Financial Services, Inc. v Natalie Freeman, in the Superior Court of New Jersey, Hudson County, Law Division, Special Civil Part, docket no. DC-031425-10 and that subsequent to service of the complaint an answer was filed by Ms. Freeman.

6. During the litigation NCFSI was advised that Ms. Freeman would qualify as a hardship case and based on that fact and the small amount in controversy a business decision was made to dismiss the case. It is my understanding that the aforementioned lawsuit was dismissed with prejudice on June 3, 2011.

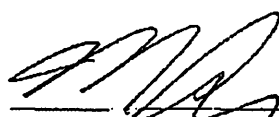
7. NCFSI reports to the three (3) major credit bureaus (Transunion, Equifax and Experian) once a month on the 1st of the month.

8. After we have owned the account for 60 days, we first report the account. We have certain basic criteria which must be met before an account is reported, such as amount due, address that is in the country, cannot be disputed, bankrupt, deceased or if in suit have an answer filed. Only the primary account holder will be reported.

9. There are only three (3) codes our company reports: Code 93 (assigned to collections), Code 62 (Paid in Full), or Code DA (to Delete).

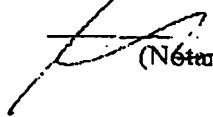
10. If an account falls outside of our reporting criteria after it has been reported, we immediately delete our trade line on the next reporting cycle.

11. We also have signed up for an online service called E-OSCAR, which allows us to receive disputes and updates on a daily basis from all 3 credit bureaus.



Marko Galic

Sworn to and subscribed before me
this 2nd day of April, 2012
as his free and voluntary act and deed
for the purposes set forth above.



(Notary Public)

**ERIC SOMBERS
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES JUNE 24, 2012**

MAURICE H. PRESSLER (1938-2002)
SHELDON H. PRESSLER

GERARD J. FELT
STEVEN P. MCCART
LAWRENCE J. MOERHOUT, JR.

MITCHELL L. WILLIAMSON (NJ & NY)
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JOGANNE L. D'AURO (DC, PG, NJ & NY)
MITCHELL E. ZIPKIN (NJ & NY)
CRAIG S. STILLER (NY ONLY)

PRESSLER AND PRESSLER, L.L.P.

COUNSELLORS AT LAW
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OFFICE HOURS:
Monday-Thursday: 6am-5pm
Friday: 8am-7pm
Saturday: 9am-7pm

01/26/12

HUDSON Special Civil Part
SPECIAL CIVIL CASE MGMT OFFICE
595 NEWARK AVE, ROOM 711
JERSEY CITY, NJ 07306

Re: NEW CENTURY FINANCIAL SERVICES, INC. vs [REDACTED]

Superior Court of New Jersey: Law Division
HUDSON Special Civil Part
Docket Number [REDACTED]
P&P File No [REDACTED]
Balance \$667.37

TEAM B FEE: NO FEE ITEM

Dear Clerk:

The above captioned matter is currently scheduled for trial on Friday, January 27, 2012.

Please mark the case settled. The Stipulation of Settlement has been forwarded to our adversary for signature. Upon receipt of a fully executed Stipulation of Settlement, it will be forwarded to the Court for filing.

Thank you for your attention to this matter.

Very truly yours,

PRESSLER and PRESSLER, LLP

S/ DARREN H. TANAKA
DARREN H. TANAKA

cc: [REDACTED]
[REDACTED]
[REDACTED]

MAURICE H. PRESSLER (1920-2007)
SHELDON H. PRESSLER

GERARD J. FELT
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PRESSLER AND PRESSLER, L.L.P.

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Reply to (X) NJ Office | NY Office | PA Office

01/27/12

Re: NEW CENTURY FINANCIAL SERVICES, INC. vs. [REDACTED]
Superior Court of New Jersey: Law Division
HUDSON Special Civil Part
Docket No. [REDACTED]
P&P FILE NO [REDACTED]

Dear [REDACTED]

Enclosed please find original and two (2) copies of the Stipulation of Settlement.

Kindly sign the original and a copy where indicated by the "X". Return them by return mail in the postage-paid envelope so that we may file it with the Court.

The immediate return is necessary even though your payment may not be due until a future date; Wednesday, February 01, 2012. If you fail to immediately return the Stipulation of Settlement, we will have to continue with our collection efforts.

Please keep the last copy for your records.

Very truly yours,

PRESSLER and PRESSLER, LLP

S/Rita E. Ayoub

Rita E. Ayoub

Enclosures

THIS COMMUNICATION IS FROM A DEBT COLLECTOR.



[REDACTED]

PRESSLER AND PRESSLER, L.L.P.

COUNSELLORS AT LAW

7 Entin Rd.

Passippany, NJ 07054-5020

(973) 751-5100

Attorney for Plaintiff

NEW CENTURY FINANCIAL SERVICES, INC.

Plaintiff

vs.

[REDACTED]
Defendant(s)

SUPERIOR COURT OF NEW JERSEY

LAW DIVISION:

HUDSON Special Civil Part

Docket No. [REDACTED]

CIVIL ACTION

STIPULATION OF SETTLEMENT

Dated: 01/26/12

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PRESSLER and PRESSLER, LLP

BY S/Rita E. Ayoub

Rita E. Ayoub

Attorneys for Plaintiff

02 / ___ /12 X

Dated: [REDACTED]
[REDACTED]
[REDACTED]

P&P FILE NO [REDACTED]

TEAM B FEE: NO FEE ITEM

PRESSLER and PRESSLER, LLP
Counsellors At Law
7 Entin Rd.
Parsippany, NJ 07054-5020
1-973-753-5100

Attorneys for Plaintiff

Plaintiff

LVNV FUNDING LLC

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
HUDSON Special Civil Part
DOCKET NO [REDACTED]

vs.

CIVIL ACTION

Defendant(s)

WARRANT FOR SATISFACTION
OF JUDGMENT

[REDACTED]

TO THE CLERK OF THIS COURT:

You are hereby directed to satisfy of record, the judgment in the above matter.

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.

Dated: 04/03/12

PRESSLER and PRESSLER, LLP
Attorneys for Plaintiff

By: S/Rita E. Ayoub
Rita E. Ayoub

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY (Newark)

===== :
: NATALIE A. WILLIAMS individually,
: and on behalf of all others similarly
: situated

Plaintiff

vs.

PRESSLER & PRESSLER, LLP,

Defendant
===== :

2:11-cv-07296 (KSH)(PS)

AFFIDAVIT OF
RALPH GULKO, ESQ.



State of New Jersey: : SS
County of Morris :

I, Ralph Gulko, Esq., of full age and under oath do state:

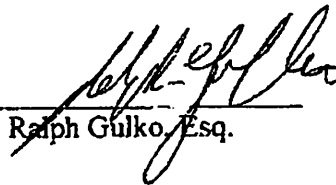
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2. When new retail consumer collection claims are received by Pressler from their clients, the first step is to send the "Initial Notice letter" pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. §1692 ("FDCPA") to the named account holder(s).

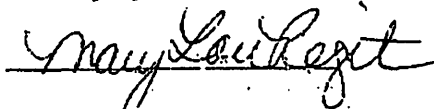
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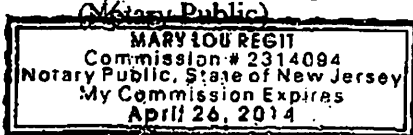
4. The proposed complaints are then reviewed for their service and filing.

5. I review each proposed complaint in its entirety. I make sure all information contained in the Summons and Complaint ("SAC") is the same information that was received by the client. I also review the file notes on the account to ascertain whether there have been any changes in that information due to post-referral credits and/or address changes.
6. I further review the account to confirm all changes are current. If there are other accounts for the debtor I will check those claims and look at any documents related to that claim. I further check for any credit reports that have been obtained to confirm correct and updated information.
7. If documents are to be attached to the SAC, such as a medical bill, I review those to be sure the document(s) is(are) the correct one to use, and that all private information has been redacted.
8. Generally, the SAC must be correct in all respects in order to be approved. This includes name, address, county of venue, amount, the cause of action alleged in the body of the complaint, the statute of limitations, and anything else that would give me any cause or reason to reject the SAC.
9. I look to see if there is any reason to reject it, such as an intervening bankruptcy filing. Even a late payment will cause me to reject it for purposes of redoing the SAC to reflect the new and now lower balance.
10. Finally if the SAC is "good" I approve it for filing. If I find what I perceive to be a "problem" I return it to the originating department for review with my reasons for rejection.


Ralph Gulko, Esq.

Sworn to and subscribed before me
this 2nd day of April, 2012
as his free and voluntary act and deed
for the purposes set forth above.





Pressler and Pressler, LLP
7 Entin Rd.
Parsippany, NJ 07054-5020
(973) 753-5100
Attorney for Plaintiff
File # F96305

NEW CENTURY FINANCIAL SERVICES, INC.

SUPERIOR COURT OF NEW JERSEY
Law Division

Plaintiff

vs.

HUDSON Special Civil Part

Docket # DC-031425-10

NATALIE FREEMAN

Defendant(s)

Civil Action
COMPLAINT
(Contract)

Plaintiff having a principal place of business at: 110 SOUTH JEFFERSON ROAD SUITE 104 WHIPPANY, NJ 07981 says:

1. It is now the owner of the defendant(s) GE CAPITAL - REGULAR WAL-MART account number C77W03423244788 which is now in default. There is due the plaintiff from the defendant(s) NATALIE FREEMAN the sum of \$720.11 plus interest from 10/27/2010 to 12/15/2010 in the amount of \$1.45 for a total of \$721.56.

WHEREFORE, plaintiff demands judgment for the sum of \$721.56 plus accruing interest to the date of judgment plus costs.

I certify that the matter in controversy is not the subject of any other court action or arbitration proceeding, now pending or contemplated, and that no other parties should be joined in this action.

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 in Rule 1:38-7(b).

PRESSLER and PRESSLER, LLP
Attorneys for Plaintiff(s)
By: S/Ralph Gulko

Ralph Gulko



Pressler and Pressler, LLP
7 Entin Rd.
Parsippany, NJ 07054-5020
(973)753-5100
Attorney for Plaintiff
File # F96305

NEW CENTURY FINANCIAL SERVICES, INC.

SUPERIOR COURT OF NEW JERSEY
Law Division

Plaintiff

vs.

HUDSON Special Civil Part

Docket #

NATALIE FREEMAN

Defendant(s)

Civil Action
COMPLAINT
(Contract)

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PRESSLER and PRESSLER, LLP
Attorneys for Plaintiff(s)

By: _____
Ralph Gulko



P&P FILE NO F96305
PRESSLER and PRESSLER, LLP
Counsellors At Law
7 Entin Rd.
Parsippany, NJ 07054-5020
(973)753-5100

TEAM A FEE: NO FEE ITEM

Attorneys for Plaintiff

Plaintiff

NEW CENTURY FINANCIAL SERVICES,
INC.

vs.

Defendant(s)

NATALIE FREEMAN

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
HUDSON Special Civil Part
DOCKET NO DC-031425-10
CIVIL ACTION

STIPULATION OF DISMISSAL

TO THE CLERK OF THIS COURT:

Please dismiss the above action.

Dated: 03/31/11

PRESSLER and PRESSLER, LLP
Attorneys for Plaintiff

By: S/Ralph Gulko
Ralph Gulko



P&P FILE NO F96305

PRESSLER and PRESSLER, LLP
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7 Entin Rd.
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(973)753-5100

Attorneys for Plaintiff

Plaintiff
NEW CENTURY FINANCIAL SERVICES, INC.

vs.
Defendant(s)

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION
HUDSON Special Civil Part
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STIPULATION OF DISMISSAL

NATALIE FREEMAN

TO THE CLERK OF THIS COURT:

Please dismiss the above action.

Dated: 03/31/11

PRESSLER and PRESSLER, LLP
Attorneys for Plaintiff

By: *Ralph Gulko*
Ralph Gulko

Please note, the original Stipulation of Dismissal has been filed with the court to notify them that this matter had been terminated.

Please save this copy for your records.

NATALIE FREEMAN
271 CHAPEL AVE APT 2
JERSEY CITY, NJ 073052911



PRESSLER and PRESSLER, LLP
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Parsippany, NJ 07054-5020
(973)753-5100 Ext. 5100
Attorney for Plaintiff

Debit Acct # 140275
Using reference # 112326493
P & P FILE NO. S258431

Plaintiff
NEW CENTURY FINANCIAL SERVICES, INC.
vs.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION MERCER COUNTY
Docket No.
CIVIL ACTION
COMPLAINT

Defendant

ALAN J SETNESKA

Plaintiff having a principal place of business at: 110 S. JEFFERSON ROAD SUITE 104
WHIPPANY, NJ 07981 says:

1. It is now the owner of the defendant(s) CITIBANK SOUTH DAKOTA, N.A. account
number 5121079640375975 which is now in default. There is due the plaintiff from
the defendant(s) ALAN J SETNESKA the sum of \$15,219.30 plus interest from
04/08/2011 to 06/03/2011 in the amount of \$11.68 for a total of \$15,230.98.

WHEREFORE, plaintiff demands judgment for the sum of \$15,230.98 plus accruing
interest to the date of judgment plus costs.

I certify that the matter in controversy is not the subject of any other court
action or arbitration proceeding, now pending or contemplated, and that no other
parties should be joined in this action.

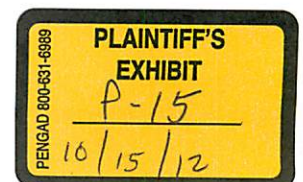
PRESSLER and PRESSLER, LLP
Attorneys for Plaintiff
By: s/Ralph Gulko
Ralph Gulko



1:4-5. Signing and Dating of Pleadings; Motions

Pleadings (other than indictments), motions and briefs shall be signed by the attorney of record or the attorney's associate or by a pro se party. Signatures of a firm may be typed, followed by the signature of an attorney of the firm. Signatures on any duplicate original or carbon copy required to be filed may be typed. Every paper to be filed shall bear the date on which it was signed.

N.J. Ct. R. 1:4-5



1:4-8. Frivolous Litigation

(a) Effect of Signing, Filing or Advocating a Paper. The signature of an attorney or pro se party constitutes a certificate that the signatory has read the pleading, written motion or other paper. By signing, filing or advocating a pleading, written motion, or other paper, an attorney or pro se party certifies that to the best of his or her knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

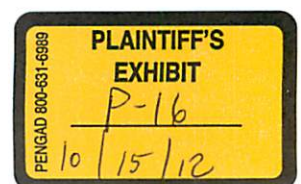
- (1) the paper is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation;
- (2) the claims, defenses, and other legal contentions therein are warranted by existing law or by a non-frivolous argument for the extension, modification, or reversal of existing law or the establishment of new law;
- (3) the factual allegations have evidentiary support or, as to specifically identified allegations, they are either likely to have evidentiary support or they will be withdrawn or corrected if reasonable opportunity for further investigation or discovery indicates insufficient evidentiary support; and
- (4) the denials of factual allegations are warranted on the evidence or, as to specifically identified denials, they are reasonably based on a lack of information or belief or they will be withdrawn or corrected if a reasonable opportunity for further investigation or discovery indicates insufficient evidentiary support.

If the pleading, written motion or other paper is not signed or is signed with intent to defeat the purpose of this rule, it may be stricken and the action may proceed as though the document had not been served. Any adverse party may also seek sanctions in accordance with the provisions of paragraph (b) of this rule.

(b) Motions for Sanctions.

(1) *Contents of Motion, Certification.* An application for sanctions under this rule shall be by motion made separately from other applications and shall describe the specific conduct alleged to have violated this rule. No such motion shall be filed unless it includes a certification that the applicant served written notice and demand pursuant to R. 1:5-2 to the attorney or pro se party who signed or filed the paper objected to. The certification shall have annexed a copy of that notice and demand, which shall (i) state that the paper is believed to violate the provisions of this rule, (ii) set forth the basis for that belief with specificity, (iii) include a demand that the paper be withdrawn, and (iv) give notice, except as otherwise provided herein, that an application for sanctions will be made within a reasonable time thereafter if the offending paper is not withdrawn within 28 days of service of the written demand. If, however, the subject of the application for sanctions is a motion whose return date precedes the expiration of the 28-day period, the demand shall give the movant the option of either consenting to an adjournment of the return date or waiving the balance of the 28-day period then remaining. A movant who does not request an adjournment of the return date as provided herein shall be deemed to have elected the waiver. The certification shall also certify that the paper objected to has not been withdrawn or corrected within the appropriate time period provided herein following service of the written notice and demand.

No motion shall be filed if the paper objected to has been withdrawn or corrected within 28 days of service of the notice and demand or within such other time period as provided herein.



(2) *Time for Filing; Attorney's Fees.* A motion for sanctions shall be filed with the court no later than 20 days following the entry of final judgment. If warranted, the court may award to the party prevailing on the motion the reasonable expenses and attorneys' fees incurred in presenting or opposing the motion. For purposes of this rule, the term "final judgment" shall include any order deciding a post-judgment motion whether or not that order is directly appealable.

(3) *Scope of Responsibility.* Except in extraordinary circumstances, a law firm shall be jointly responsible for violations committed by its partners, shareholders, associates and employees.

(c) Sanction on Court's Initiative. On its own initiative, the court may enter an order describing the specific conduct that appears to violate this rule and directing the attorney or pro se party to show cause why he or she has not violated the rule. The order to show cause shall issue before a voluntary dismissal or settlement of the claims made by or against the pro se party or the attorney who is the subject of the order to show cause.

(d) Order for Sanctions. A sanction imposed for violation of paragraph (a) of this rule shall be limited to a sum sufficient to deter repetition of such conduct. The sanction may consist of (1) an order to pay a penalty into court, or (2) an order directing payment to the movant of some or all of the reasonable attorneys' fees and other expenses incurred as a direct result of the violation, or both. Among the factors to be considered by the court in imposing a sanction under (2) is the timeliness of the movant's filing of the motion therefor. In the order imposing sanctions, the court shall describe the conduct determined to be a violation of this rule and explain the basis for the sanction imposed.

(e) Exceptions. This rule does not apply to disclosures and discovery requests, responses, objections, and discovery motions that are subject to the provisions of R. 4:23.

(f) Applicability to Parties. To the extent practicable, the procedures prescribed by this rule shall apply to the assertion of costs and fees against a party other than a pro se party pursuant to N.J.S.A. 2A:15-59.1.