



“I don’t just prepare to fight,
I prepare to win.

I believe if you want results,
you must be prepared to go to war.”

- Jonathan H. Kline



JK
LAW®

Jonathan Kline, P.A.
Attorneys at Law

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Dear Resident,

If you have already retained a lawyer for this matter, please disregard this letter.

After reviewing the court docket, I have found that you are facing a foreclosure lawsuit on your property. I have been practicing law in the State of Florida since 1994 and I have been practicing foreclosure defense since 2007. I attended the University of Miami for my undergraduate degree and the University of Miami School of Law for my law degree.

Your foreclosure is a lawsuit that must be responded to within 20 days from the time you have been served.

I have **extensive experience** in fighting the banks and lenders that have created the foreclosure problem. I have handled hundreds of foreclosure trials and many foreclosure appeals.

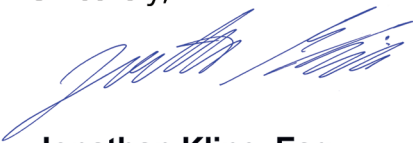
I am available for an initial **free** consultation and I would like to talk with you about defending your foreclosure lawsuit either in person or over the phone.

My schedule is flexible and I am able to talk with you **7 days a week**, including evenings.

It does not cost you any additional amount of money to hire me to fight for you and your family's rights. **Call me now, so we can get started immediately!**

My initial consultation is **free**, and you will be glad you found the right attorney to handle your foreclosure matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jonathan Kline', is written over a light blue horizontal line.

Jonathan Kline, Esq.
Attorney at Law

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01

What types of defenses are available to me?

I apply many defenses in foreclosure actions. Never attempt to represent yourself in a foreclosure law suit, you should only hire an experienced attorney that is well equipped and has years of experience at the trial and appellate court levels to handle your foreclosure action. A few of the defenses I utilize are as follows:

- A)** Failure of the Lender/Bank to prove their standing to file and maintain their foreclosure action;
- B)** Failure of the Lender/Bank to comply with conditions precedent of the mortgage;
- C)** Failure of the Lender/Bank to conduct a face to face interview on an FHA loan pursuant to 24 Code of Federal Regulations § 203.604;
- D)** Unclean hands on behalf of the Lender/Bank/Servicer;
- E)** Improper verification of the Lender/Bank's foreclosure complaint;
- F)** Statute of limitations;
- G)** Improper pleading of the complaint pursuant to Florida law;
- H)** Res Judicata;
- I)** Accord and satisfaction;
- J)** Novation; and
- K)** Failure of the Lender/Bank to properly pay documentary stamps and intangible tax on the note.

At trial, there are a plethora of other tactics I employ as the bank attempts to prove their case in court. These include evidentiary objections and my intuitive thinking based upon 24 years of experience in real property litigation and real property transactional work. I take advantage of the Florida Rules of Evidence which provide many ways they may prevent key pieces of evidence from being introduced on the Lender/Bank's behalf. This may prevent key pieces of evidence needed to prove the Lender/Bank's case.

I have defeated the Lender/Banks based upon my in-depth knowledge of the Florida Rules of Evidence, the Florida Rules of Civil Procedure, Florida statutory law, Florida case law, and my sixth sense and ability to maneuver in the court room during trial. See our web site at JKLawFL.com which talks about all of the above-mentioned defenses and rules of evidence.

I have handled close to 90 appeals in the area of foreclosure defense. If we lose at the trial court level, I recommend having an appellate court review your case to see if the trial court made any errors in the determination of your legal rights. I have successfully argued before the District Courts of Appeal in Florida for my clients' rights and won. I actually made headway in new areas of the law within foreclosure defense. I am pleased to see that the Florida District Courts of Appeal are open to listening to new arguments in the area of foreclosure defense.

02 [Do I qualify for a **loan modification?**]

You may qualify for a loan modification. This will be determined based upon your income, the amount you owe on your home, and your monthly living expenses. A modification may benefit you by lowering your interest rate, lowering the principal amount of your loan, or partially forgiving your debt by the lender or bank that owns your loan.

03

Should I just do a short sale?

If you are living in the property and it is providing adequate shelter for you and your family, we **do not** recommend a short sale. I encourage you to defend the foreclosure action and at some point, after litigation has progressed, we can always revisit the need for a short sale and see if it is appropriate for your individual situation.



Will bankruptcy help me with my situation?

04

A Chapter 7 bankruptcy will not protect your real property unless you apply for a modification within the Chapter 7 filing. A filing of a Chapter 13 bankruptcy may protect your real property if your petition for bankruptcy is properly postured before the court. Bankruptcy is a last resort legal maneuver.

05

What should I do after I am served
with a foreclosure complaint?

Please call me immediately! My office number is (954) 888-4646 and my cell is (954) 275-0356. You have only 20 days to respond to the complaint. I do not recommend, for one moment, that you attempt to represent yourself. Please call us as our fees are very affordable.

Experience of Jonathan Kline, Esq.:

- Licensed to practice law in the State of Florida since 1994.
- Has personally handled hundreds of foreclosure trials.
- Handled approximately 90 foreclosure appeals.

06

How can I meet with
Jonathan Kline, Esq.?

I would love to meet with you, please call my office to setup your **FREE** Consultation in person or by phone.

Broward: (954) 888-4646
Miami-Dade: (305) 443-3554
Palm Beach: (561) 733-6761
Monroe: (305) 443-3554
Mobile: (954) 275-0356
Nationwide: (800) 581-5297

Offices in Broward County, Florida





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Contact us for a FREE Consultation!

**We are available 24 hours / 7 days a week
to set up your Free Consultation.**

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Se Habla Español!



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