

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

FINANCE OF AMERICA REVERSE LLC,

Plaintiff

vs.

**CARMEN JULIA SANTIAGO A/K/A
CARMEN J. SANTIAGO A/K/A CARMEN
JULIA SANTIAGO SANTIAGO A/K/A
CARMEN J. LARO A/K/A CARMEN J.
LARO SANTIAGO A/K/A CARMEN J.
SANTIAGO SANTIAGO A/K/A CARMEN
JULIA LARO A/K/A CARMEN JULIA
LARO SANTIAGO; UNITED STATES OF
AMERICA,**

Defendants

CIVIL ACTION NO.: 17-cv-2224-FAB

MOTION FOR ISSUANCE OF SUMMONS BY PUBLICATION

TO THE HONORABLE COURT:

COMES NOW, FINANCE OF AMERICA REVERSE LLC, thorough undersigned counsel, and respectfully state, allege and pray:

1. On September 26, 2017, Plaintiff FINANCE OF AMERICA REVERSE LLC, file the instant action against defendants. **Docket No. 1.**
2. On October 3, 2017, this Honorable Court issued Summonses for Defendants. **Docket No.3.**
3. FINANCE OF AMERICA REVERSE LLC, respectfully states that A Better Process, process server, tried to personally serve Defendant CARMEN JULIA

SANTIAGO A/K/A CARMEN J. SANTIAGO A/K/A CARMEN JULIA SANTIAGO SANTIAGO A/K/A CARMEN J. LARO A/K/A CARMEN J. LARO SANTIAGO A/K/A CARMEN J. SANTIAGO SANTIAGO A/K/A CARMEN JULIA LARO A/K/A CARMEN JULIA LARO SANTIAGO, with Summons and the Complaint and could not serve said defendant personally. See, **Exhibit I**, Sworn Statement.

4. For the aforementioned reasons and in accordance with Rule 4.6 of the Rules of Civil Procedure for the Commonwealth of Puerto Rico, FINANCE OF AMERICA REVERSE LLC moves this Honorable Court for an order directing service by publication based upon the sworn statement of process server, Mr. A Better Process.

5. Personal service upon Defendant CARMEN JULIA SANTIAGO A/K/A CARMEN J. SANTIAGO A/K/A CARMEN JULIA SANTIAGO SANTIAGO A/K/A CARMEN J. LARO A/K/A CARMEN J. LARO SANTIAGO A/K/A CARMEN J. SANTIAGO SANTIAGO A/K/A CARMEN JULIA LARO A/K/A CARMEN JULIA LARO SANTIAGO, is not practicable and service by publication is necessary and appropriate, according to applicable law.

WHEREFORE, FINANCE OF AMERICA REVERSE LLC respectfully requests this Honorable Court to order the Clerk of the Court to issue the Summons by publication as to Defendant CARMEN JULIA SANTIAGO A/K/A CARMEN J. SANTIAGO A/K/A CARMEN JULIA SANTIAGO SANTIAGO A/K/A CARMEN J.

LARO A/K/A CARMEN J. LARO SANTIAGO A/K/A CARMEN J. SANTIAGO SANTIAGO A/K/A CARMEN JULIA LARO A/K/A CARMEN JULIA LARO SANTIAGO, in accordance with the provisions of Rule 4.6 of the Rules of Civil Procedure for the Commonwealth of Puerto Rico, for which the proposed order and Summons for publication are included. See, **Exhibit II** and **Exhibit III**.

RESPECTFULLY SUBMITTED.

This 1st. day of March, 2018.

I HEREBY CERTIFY that this document has been electronically filed with the Clerk of this Court using the CM-ECF system which will send notice to all attorneys of record, CM/ECF participants, and a true and correct copy has been served via CM/ECF or United States Mail to the parties listed in the following service list.

ROBERTSON ANSCHUTZ & SCHNEID, P.L.

/s/ Andrés Sáez Marrero
USDC-PR: 229802
Attorneys for Plaintiff
Primary E-Mail Addresses:
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6409 Congress Ave., Suite 100
Boca Raton, FL 33487
Telephone: 561-241-6901

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

FINANCE OF AMERICA REVERSE LLC,
Plaintiff

CIVIL ACTION NO.: 17-cv-2224-FAB

vs.

**CARMEN JULIA SANTIAGO A/K/A
CARMEN J. SANTIAGO A/K/A
CARMEN JULIA SANTIAGO SANTIAGO
A/K/A CARMEN J. LARO A/K/A
CARMEN J. LARO SANTIAGO A/K/A
CARMEN J. SANTIAGO SANTIAGO
A/K/A CARMEN JULIA LARO A/K/A
CARMEN JULIA LARO SANTIAGO;
UNITED STATES OF AMERICA,**
Defendants

ORDER FOR SERVICE BY PUBLICATION

Having examined Plaintiff's Motion for Service by Publication (Docket No. 8), and the attached Affidavit (Exhibit I of Docket No. 8), and it appearing that defendant, CARMEN JULIA SANTIAGO A/K/A CARMEN J. SANTIAGO A/K/A CARMEN JULIA SANTIAGO SANTIAGO A/K/A CARMEN J. LARO A/K/A CARMEN J. LARO SANTIAGO A/K/A CARMEN J. SANTIAGO SANTIAGO A/K/A CARMEN JULIA LARO A/K/A CARMEN JULIA LARO SANTIAGO, could not be served personally with summonses despite all the efforts made by Plaintiff, this Court authorizes service of defendant CARMEN JULIA SANTIAGO A/K/A CARMEN J. SANTIAGO A/K/A CARMEN JULIA SANTIAGO SANTIAGO A/K/A CARMEN J. LARO A/K/A CARMEN J. LARO SANTIAGO A/K/A

CARMEN J. SANTIAGO SANTIAGO A/K/A CARMEN JULIA LARO A/K/A CARMEN JULIA LARO SANTIAGO, by publication, as authorized by Rule 4.6 of Puerto Rico Civil Procedure, made applicable by Fed.R.Civ.P. 4(e)(1). Plaintiff will further credit faithful compliance with all of the aforementioned Rules' requirements.

IT IS SO ORDERED.

In San Juan, Puerto Rico, this ___ day of _____, _____.

U.S. District Judge

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

FINANCE OF AMERICA REVERSE LLC,
Plaintiff

CIVIL ACTION NO.:17-cv-2224-FAB

vs.

**CARMEN JULIA SANTIAGO A/K/A
CARMEN J. SANTIAGO A/K/A CARMEN
JULIA SANTIAGO SANTIAGO A/K/A
CARMEN J. LARO A/K/A CARMEN J.
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SANTIAGO SANTIAGO A/K/A CARMEN
JULIA LARO A/K/A CARMEN JULIA
LARO SANTIAGO; UNITED STATES OF
AMERICA,**

Defendants

SUMMONS BY PUBLICATION

**TO: CARMEN JULIA SANTIAGO A/K/A CARMEN J. SANTIAGO A/K/A
CARMEN JULIA SANTIAGO SANTIAGO A/K/A CARMEN J. LARO
A/K/A CARMEN J. LARO SANTIAGO A/K/A CARMEN J. SANTIAGO
SANTIAGO A/K/A CARMEN JULIA LARO A/K/A CARMEN JULIA
LARO SANTIAGO,**

L-2 CALLE 8 URB BRISAS DEL MAR LUQUILLO, PR 00773

The plaintiff has filed proceedings for foreclosure of mortgage executed by the defendant on a property situated at: L-2 CALLE 8 URB BRISAS DEL MAR LUQUILLO, PR 00773. Pursuant to the Order at Docket No. _____, United States District Judge Francisco A. Besosa, you are hereby SUMMONED to appear, plead or answer the Complaint filed herein no late than thirty (30) days after publication of this Summons by serving the original plea or answer to the United States District Court for the District of Puerto Rico, and serving a copy to counsel for plaintiff: Robertson, Anschutz & Schneid, P.L., at P.O. Box 191267, San Juan, PR 00919, telephone number 561-241-6901; fax number 561-997-6909; prservice@rasflaw.com.

This Summons shall be published by edict only once in a newspaper of general circulation in the Island of Puerto Rico. Within ten (10) days following publication of this Summons, a copy of this Summons and the Complaint will be sent to defendant CARMEN JULIA SANTIAGO A/K/A CARMEN J.

SANTIAGO A/K/A CARMEN JULIA SANTIAGO SANTIAGO A/K/A CARMEN J. LARO A/K/A CARMEN J. LARO SANTIAGO A/K/A CARMEN J. SANTIAGO SANTIAGO A/K/A CARMEN JULIA LARO A/K/A CARMEN JULIA LARO SANTIAGO, , by certified mail/return receipt requested, addressed to its last known address. Should you fail to appear, plead or answer to the Complaint as ordered by the Court and noticed by this Summons, the Court will proceed to hear and adjudicate this cause against you based on the relief demanded in the Complaint.

BY ORDER OF THE COURT, Summons is issued pursuant to Fed.R.Civ.P 4(e) and Rule 4.6 of the Rules of Civil Procedure for the Commonwealth of Puerto Rico. In San Juan, Puerto Rico, this ____ day of _____, _____.

In San Juan, Puerto Rico, this ___ day of _____, _____.

CLERK OF THE COURT
U.S. DISTRICT COURT

Deputy Clerk

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

REVERSE MORTGAGE SOLUTIONS, INC
Plaintiff

vs.

**CARMEN JULIA SANTIAGO A/K/A
CARMEN J. SANTIAGO A/K/A CARMEN
JULIA SANTIAGO SANTIAGO A/K/A
CARMEN J. LARO A/K/A CARMEN J.
LARO SANTIAGO A/K/A CARMEN J.
SANTIAGO SANTIAGO A/K/A CARMEN
JULIA LARO A/K/A CARMEN JULIA LARO
SANTIAGO; UNITED STATES OF
AMERICA**
Defendant(s)

CIVIL ACTION NO.: 3:17-cv-02224

Received by A BETTER PROCESS, INC. on the 15th day of January, 2018 at 10:52 am to be served on **CARMEN JULIA SANTIAGO A/K/A CARMEN J. SANTIAGO A/K/A CARMEN JULIA SANTIAGO SANTIAGO A/K/A CARMEN J. LARO A/K/A CARMEN J. LARO SANTIAGO A/K/A CARMEN J. SANTIAGO SANTIAGO A/K/A CARMEN JULIA LARO A/K/A CARMEN JULIA LARO SANTIAGO, L-2 CALLE 8 URB BRISAS DEL MAR, LUQUILLO, PR 00773.**

I, ROBERT DIAZ, being duly sworn, depose and say that on the 1st day of February, 2018 at 9:35 a.m.; I:

NON-SERVED the **SUMMONS IN A CIVIL AND MORTGAGE FORECLOSURE WITH EXHIBITS.** After due search, careful inquiry and diligent attempts, was unable to serve on **CARMEN JULIA SANTIAGO A/K/A CARMEN J. SANTIAGO A/K/A CARMEN JULIA SANTIAGO SANTIAGO A/K/A CARMEN J. LARO A/K/A CARMEN J. LARO SANTIAGO A/K/A CARMEN J. SANTIAGO SANTIAGO A/K/A CARMEN JULIA LARO A/K/A CARMEN JULIA LARO SANTIAGO,** for the reasons detailed in the comments below:

SWORN STATEMENT

1. I am not a party to this action. I am over 18 years of age and reside at **TOA BAJA, PUERTO RICO.**

2. I received the summons and the complaint of the captioned case in order to complete service of process upon the defendant, **CARMEN JULIA SANTIAGO A/K/A CARMEN J. SANTIAGO A/K/A CARMEN JULIA SANTIAGO SANTIAGO A/K/A CARMEN J. LARO A/K/A CARMEN J. LARO SANTIAGO A/K/A CARMEN J. SANTIAGO SANTIAGO A/K/A CARMEN JULIA LARO A/K/A CARMEN JULIA LARO SANTIAGO,** a necessary and appropriate party in the above captioned action, and who will be referred to hereinafter as the "Defendant".

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DISTRICT OF PUERTO RICO FOR 3:17-cv-02224

3. It appears from the allegations of the complaint that the plaintiff has a cause of action for which relief can be granted.

4. I was informed that the Defendant's last known residential address is: **L-2 CALLE 8 URB BRISAS DEL MAR, LUQUILLO, PR 00773**

5. On the below dates, I visited the property located at the previously mentioned address, with the purpose of serving summons and the property appeared:

- On January 20, 2018 at 11:15 a.m., there was no one at the property and there were no neighbors around to talk to.

- On January 26, 2018 at 7:00 p.m., there was no one at the property and there were no neighbors around to talk to. There was a car inside the driveway but I could not see the model or the license plate.

- On January 31, 2018 at 7:00 a.m., there was no one at the property and there were no neighbors around to talk to. There were two cars inside the garage. The property does not look abandoned. I spoke to the neighbor, CARMEN SANTOS, who stated that the Defendant resides in the property but on December, she went to the States but does not know where or when she will be back. She thinks that the Defendant left because there was electricity in the community after the hurricane. She has no other information on the Defendant or the Defendant's relatives.

- On February 17, 2018 at 8:12 pm, there was no one at the property and there were no neighbors around to talk to. There was no movement. The cars were still in the same position. Nothing has changed.

6. Pursuant to the information provided I, searched on social networks in order to locate any information on Defendant.

No Results were found

7. On February 5, 2018 at 3:27 pm, I was informed by my internal skip department that they located two possible addresses for the Defendant in the States. A separate Sworn Statement will be provided for the addresses in the States.

8. On February 1, 2018 at 9:20 am, I arrived at the police headquarters of LUQUILLO and there, I interviewed Agent GOMEZ, Badge No. 33223, who informed me that she could not provide any information.

9. On February 1, 2018 at 9:00 a.m., I called the town hall of LUQUILLO and spoke to ANA FIGUEROA in Human Resources, who informed me that the Defendant was unknown.

10. On February 1, 2018 at 9:35 am, I visited the United States Postal office nearest to the property address and requested any information that could lead to the Defendant, and was informed that:

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DISTRICT OF PUERTO RICO FOR 3:17-cv-02224

In order to obtain any information or forwarding address, a Forwarding Address Request Form needed to be submitted and it will take 20-30 days to receive any feedback from the post office. I submitted a form to request a forwarding address for the Defendant.

11. On February 3, 2018 at 9:20 a.m., I performed a person search using INTELIUS, which provided no information that could lead to the Defendant.

12. I was unable to serve the summons of process upon the Defendant, as I have been unable to locate the Defendant despite multiple efforts undertaken by me to do so.

I subscribe the present affidavit for all legal purposes, including but not limited to its use by public or private agencies or entities as it may be deemed appropriate.

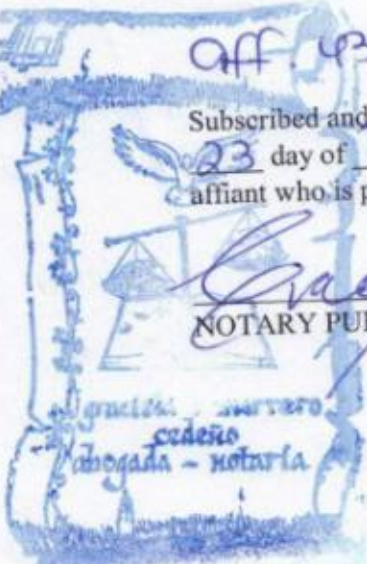
I declare that I am of legal capacity according to Civil Procedures of Puerto Rico Rule 4.3, I certify that I executed service of Summons and Complaint in the above manner.



aff. 43, 515

Subscribed and Sworn to before me on the 23 day of Feb., 2018 by the affiant who is personally known to me.

[Signature]
NOTARY PUBLIC



[Signature]

ROBERT DIAZ
Process Server

A BETTER PROCESS, INC.
1095 Broken Sound Parkway, NW
Suite 203
Boca Raton, FL 33487
(561) 981-6436

Our Job Serial Number: ABR-2018001065
Ref: 17-079368