PNC BANK, NATIONAL ASSOCIATION

VERSUS

SHIRONE MARTIN

CASE NO: 743,348 DIV. A
CIVIL DISTRICT COURT

PARISH OF JEFFERSON

STATE OF LOUISIANA

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PETITION FOR INTERVENTION AND NOTICE OF PROOF OF CLAIM

NOW INTO COURT, through undersigned counsel, comes Intervenor, the State of Louisiana, Office of Community Development, Disaster Recovery Unit, Hazard Mitigation Grant Program (hereinafter, "HMGP"), through this Petition for Intervention and Notice of Proof of Claim, which respectfully represents:

1.

On February 12, 2015, HMGP received the February 2, 2015 Mennonite notice regarding the February 18, 2015 sale of 2169 Daniels Road, Terrytown, Louisiana 70056, the property owned by the Defendant, SHIRONE MARTIN.

2.

SHIRONE MARTIN is a major domiciliary of Jefferson Parish, who voluntarily participated in HMGP to mitigate/reconstruct her home after Hurricane Katrina.

3.

HMGP is a mitigation program funded by FEMA and is administered by the State of Louisiana, the grantee. HMGP assists homeowners whose homes were damaged as a result of Hurricanes Katrina and Rita. It also helps homeowners in coastal Louisiana protect their homes from damage which may occur in future natural disasters by elevating their homes, reconstructing

6.

The last attempt to obtain proof of flood insurance from Defendant was made via email by Mitigation Analyst Tyrone Jones on February 12, 2015, and as of the close of the HMGP office at 5:00 p.m. on February 13, 2015, Defendant still had not responded to Mr. Jones and did not provide the requested proof.

7.

SHIRONE MARTIN's failure to provide HMGP with proof of flood insurance has resulted in Defendant owing HMGP $100,000.00 in federal funds, which must be recovered by HMGP, the state program charged with distributing FEMA funds for mitigation projects.

8.

HMGP must account to FEMA for all funds issued through HMGP. Failure of HMGP to recover the $100,000.00 from Defendant will result in reimbursement to FEMA being made directly by the State of Louisiana.

9.

HMGP now petitions to intervene in the seizure and judicial sale of SHIRONE MARTIN's property at 2169 Daniels Road, Terrytown, Louisiana 70056 and notices all interested parties that the covenant running with the land recorded in Jefferson Parish at CB Book 3295, Page 4 evidences the obligation of SHIRONE MARTIN and all future owners of the property to comply with the terms and provisions of the covenant, specifically the requirement to maintain flood insurance in perpetuity. *See Exhibit B.* Said judicial sale is scheduled for February 18, 2015 or on any day

ALL PREMISES CONSIDERED, WHEREFORE, INTERVENOR PRAYS:

a. For leave of court to file this petition of intervention;

b. It is permitted to intervene in the seizure and judicial sale of 2169 Daniels Road, Terrytown, Louisiana 70056;

c. That the debt of $100,000.00 owed by SHIRONE MARTIN be recognized in the seizure and judicial sale of the subject property and that remaining proceeds of the sale be distributed to HMGP in satisfaction of the debt owed;

d. It be notified of any and all claims made against 2169 Daniels Road, Terrytown, Louisiana 70056;

e. That the Court grant such other relief as is just and proper.

Respectfully submitted:

La Koshia R. Roberts, #26715
State of Louisiana - HMGP
2021 Lakeshore Drive, Suite 100
New Orleans, Louisiana 70122
Telephone: (504) 284-4022
Facsimile: (504) 284-4091
LaKoshia.Roberts@la.gov

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VERIFICATION

CONSIDERING THE FOREGOING PETITION FOR INTERVENTION AND NOTICE OF PROOF OF CLAIM:

I, CRAIG P. TAFFARO, JR., Director of the State of Louisiana's Hazard Mitigation Grant Program, declare under penalty of perjury that the representations made in the foregoing Petition are true and correct to the best of my knowledge, belief and understanding.

THUS DONE ON THIS 16th **DAY OF FEBRUARY 2015 IN NEW ORLEANS, ORLEANS PARISH, LOUISIANA.**

Craig P. Taffaro, Jr.

La Koshia Reconda Roberts
Notary Public
Bar Roll No. 26715
My Commission expires at death.