

00-466-CD
NATIONAL CITY MORTGAGE CO. et al -vs- RONALD M. MCCULLOUGH et al

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

② NATIONAL CITY MORTGAGE CO.,
successor by merger to INTEGRA
③ MORTGAGE COMPANY, assignee of
LANDMARK SAVINGS ASSOCIATION,
assignee of FAMILY HOME MORTGAGE,

CIVIL DIVISION

NO.: 00-466-CO

COMPLAINT IN EJECTMENT

Plaintiff,

Code EJECTMENT

vs.

④ RONALD M. MCCULLOUGH and LISA
L. MCCULLOUGH, n/k/a LISA L.
FALISEC, husband and wife,

Defendants.

Filed on behalf of
Plaintiff

Counsel of record for this
party:

Louis P. Vitti, Esquire
PA I.D. #3810
Supreme Court #01072

Louis P. Vitti & Assoc., P.C.
916 Fifth Avenue
Pittsburgh, PA 15219
(412) 281-1725

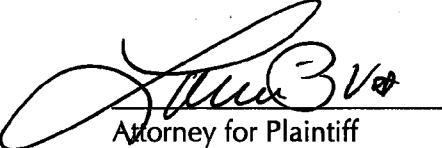
TO DEFENDANTS:

YOU ARE HEREBY NOTIFIED TO PLEAD TO
THE ENCLOSED COMPLAINT IN
EJECTMENT WITHIN TWENTY (20) DAYS
FROM SERVICE HEREOF OR A DEFAULT
JUDGMENT MAY BE ENTERED AGAINST
YOU

FILED

APR 20 2000

William A. Shaw
Prothonotary


Attorney for Plaintiff

COMPLAINT IN EJECTMENT

NOTICE

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY THE ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES AND OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE COMPLAINT OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU SHOULD NOT HAVE A LAWYER, OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**PROTHONOTARY
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
(814) 765-2641 EXT. 20**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

NATIONAL CITY MORTGAGE CO., successor by :
merger to INTEGRA MORTGAGE COMPANY, assignee :
of LANDMARK SAVINGS ASSOCIATION, assignee of :
FAMILY HOME MORTGAGE, :

NO.

Plaintiff, :

vs. :

RONALD M. MCCULLOUGH and LISA L. :
MCCULLOUGH n/k/a LISA L. FALISEC, husband and :
wife, :

Defendants. :

COMPLAINT IN EJECTMENT

AND NOW, comes the above-captioned Plaintiff, National City Mortgage Co., et al, by and through its counsel, Louis P. Vitti & Associates, P.C. and Louis P. Vitti, Esquire, who files this Complaint as follows:

1. The Plaintiff is a corporation having a principal place of business located at 3232 Newmark Drive, Miamisburg, PA 45342.
2. The Defendants are individuals, *sui juris*, whose last known address was Box 331, Burnside, PA 15721-0331 and/or R.R. 1, Glen Campbell, PA 15742.
3. On October 3, 1990, the Plaintiff's predecessor in title lent to Defendants and/or their predecessors in title, the sum of \$22,800.00, and in consideration thereof, the Defendants and/or their predecessors in title, executed a mortgage which was recorded on October 3, 1990, in the Office of the Recorder of Deeds of Clearfield County in Mortgage Book Volume 1367, page 124.

4. The premises secured by the mortgage are:

See description attached hereto as Exhibit "A".

5. The mortgage provides generally that in the event of default of payment and/or installment of principal and/or interest, inter alia, that it shall be lawful for Plaintiffs to institute, inter alia, an action in mortgage foreclosure.

6. Since October 1, 1998, the mortgage has been in default by reason of the failure of the mortgagors to make appropriate payments.

7. An action in mortgage foreclosure was instituted in the Court of Common Pleas of Clearfield County at No. 99-385-CD, and ultimately a Sheriff's Sale occurred on October 1, 1999.

8. Plaintiff has been caused to expend various sums of money in an effort to pursue this action and in addition, has incurred substantial losses in money as a result of Defendants' occupancy of the property and the termination of appropriate mortgage payments and/or other payments.

9. Defendants and/or all other occupants continue to occupy the said premises described in Exhibit "A".

WHEREFORE, Plaintiff prays Your Honorable Court enter Judgment in favor of the Plaintiff, National City Mortgage Co., et al, for sole possession of the property and vesting the title of said premises to the Plaintiff as prayed for in the Complaint.

Respectfully submitted,

LOUIS P. VITTI & ASSOCIATES, P.C.

By:

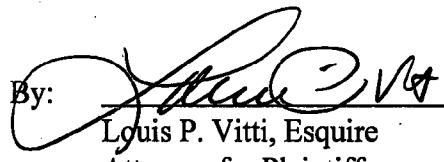

Louis P. Vitti, Esquire
Attorney for Plaintiff

Exhibit "A"

ALL those certain lots or parcels of land situate, lying and being in the Borough of Burnside, Clearfield County, Pennsylvania, bounded and described as follows:

FIRST PIECE: Those three lots of ground situate in Patchin Addition to the Borough of Burnside, known and designated therein as Lots Numbers 50, 51 and 52, each lot having a frontage of sixty (60) feet on what is known as the New Washington road and extending back one hundred sixty (160) feet to a sixteen (16) foot alley.

SECOND PIECE: All that certain lot of ground situate in the Borough of Burnside, situate on the south side of public road leading from Burnside to New Washington; Beginning at a post on said road where the road known as the Coal Bank branches from the said Burnside and New Washington road; then along said Burnside New Washington road one hundred sixty (160) feet to a post; then south fifty (50) feet to a post on the Coal Bank road; then along the northern edge of said Coal Bank road one hundred sixty (160) feet to place of beginning, containing 4000 square feet and being a three cornered lot.

BEING the same that Ronald M. McCullough and Lisa L. McCullough, husband and wife, and the mortgagors herein, acquired by Deed dated October 2, 1990 from James H. Watson and Cindy Watson, husband and wife, and such deed to be forthwith recorded.

VERIFICATION

AND NOW Louis P. Vitti verifies that the statements made in this Complaint in Ejectment are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. 4904, relating to unsworn falsification to authorities.

By virtue of the fact that the Plaintiff is outside the jurisdiction of the court and the verification cannot be obtained within the time allowed for the filing of this pleading, the pleading is submitted by counsel having sufficient knowledge, information and belief based upon the information provided him by the Plaintiff.



Dated: April 17, 2000

FILED

APR 20 2000
O 239 att. Vitt PD \$80.00
William A. Shaw
Prothonotary
4cc Sheriff

LOUIS P. VITTI

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NATIONAL CITY MORTGAGE CO.,
VS
MCCULLOUGH, RONALD M.

00-466-CD

COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW MAY 8, 2000 AT 12:51 PM DST SERVED THE WITHIN COMPLAINT IN EJECTMENT ON LISA L. MCCULLOUGH N/K/A LISA L. FALISEC, DEFENDANT AT RESIDENCE, BOX 331, BURNSIDE, CLEARFIELD COUNTY PENNSYLVANIA BY HANDING TO LISA L. MCCULLOUGH N/K/A LISA L. FALISEC A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: NEVLING.

NOW MAY 8, 2000 AT 12:51 PM EST SERVED THE WITHIN COMPLAINT IN EJECTMENT ON TENANT/OCCUPANT (MCCULLOUGH RESIDENCE) AT BOX 331, BURNSIDE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO LISA L. MCCULLOUGH N/K/A LISA L. FALISEC A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: NEVLING.

NOW APRIL 24, 2000, DONALD BECKWITH, SHERIFF OF INDIANA COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN EJECTMENT ON RONALD M. MCCULLOUGH AND LISA L. MCCULLOUGH N/K/A LISA L. FALISEC, DEFENDANTS.

NOW MAY 20, 2000 SERVED THE WITHIN COMPLAINT IN EJECTMENT ON RONALD M. MCCULLOUGH AND LISA L. MCCULLOUGH N/K/A LISA L. FALISEC, DEFENDANT BY DEPUTIZING THE SHERIFF OF INDIANA COUNTY. THE RETURN OF SHERIFF BECKWITH IS HERETO ATTACHED AND MADE A PART OF THIS RETURN STATING THAT HE SERVED ROBERT MCCULLOUGH, BROTHER AND P.I.C.

NOW MAY 31, 2000 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO RONALD M. MCCULLOUGH, DEFENDANT. DEFENDANT RESIDES IN INDIANA COUNTY.

LOUIS P. VITTI

NATIONAL CITY MORTGAGE CO.,
VS
MCCULLOUGH, RONALD M.

00-466-CD

CHARGES

COMPLAINT IN EJECTMENT

75.00 SHFF. HAWKINS PAID BY: ATTY.
70.00 SHFF. BECKWITH PAID BY: ATTY.
50.00 SURCHARGE PAID BY: ATTY.

SWORN TO BEFORE ME THIS

1st DAY OF June 2000
William A. Shaw

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2002
Clearfield Co., Clearfield, PA.

SO ANSWERS,

*Chester A. Hawkins
by Marilyn Harry*
CHESTER A. HAWKINS
SHERIFF

FILED

JUN 01 2000
09:48 AM
William A. Shaw
Prothonotary
Key

INDIANA COUNTY SHERIFF



825 PHILADELPHIA STREET
INDIANA, PENNSYLVANIA 15701
(724) 465-3930
FAX: (724) 465-3937

Donald L. Beckwith
Sheriff
David J. Rostis
Chief Deputy Sheriff

PAGE: 462

CASE NUMBER: 00-466-CD

AFFIDAVIT OF SERVICE

NOW, 20 MAY 2000, AT 3:34 P.M. SERVED

THE WITHIN COMPLAINT - EJECTMENT

UPON RONALD M MCCULLOUGH AND LISA L. MCULLOUGH

AT RD3 1 BOX 38, ARCARDIA, PA 15712

BY HANDING TO ROBERT MCCULLOUGH, BROTHER, PERSON IN CHARGE OF RESIDENCE

TWO, TRUE AND CORRECT COPY(S) OF THE WITHIN COMPLAINT - EJECTMENT

AND MAKING KNOWN TO HIM/HER/ THEM THE CONTENTS THEREOF:

//////////

NOW, 20 MAY 2000, AFTER DILIGENT SEARCH AND INQUIRY

FAILED TO FIND THE WITHIN

WITHIN MY BAILIWICK. REASON UNABLE TO LOCATE: _____

//////////

SO ANSWERS:

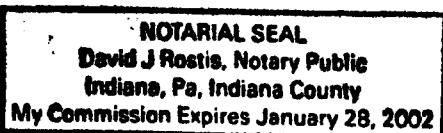
Donald L. Beckwith
DONALD L. BECKWITH, SHERIFF

BY:

Gary L. Wissinger
GARY L. WISSINGER, DEPUTY

SWORN AND SUBSCRIBED BEFORE ME.
THIS 30TH DAY OF MAY, 2000

David J. Rostis



COSTS: \$70.00
(PAID- AMMENDED COPY)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NATIONAL CITY MORTGAGE CO.,
successor by merger to INTEGRA
MORTGAGE COMPANY, assignee of
LANDMARK SAVINGS ASSOCIATION,
assignee of FAMILY HOME MORTGAGE,

CIVIL DIVISION

NO.: 00-466 CD

COMPLAINT IN EJECTMENT

Plaintiff,

Code EJECTMENT

vs.

RONALD M. MCCULLOUGH and LISA
L. MCCULLOUGH, n/k/a LISA L.
FALISEC, husband and wife,

Filed on behalf of
Plaintiff

Counsel of record for this
party:

Louis P. Vitti, Esquire
PA I.D. #3810
Supreme Court #01072

Louis P. Vitti & Assoc., P.C.
916 Fifth Avenue
Pittsburgh, PA 15219
(412) 281-1725

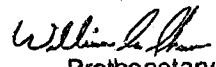
TO DEFENDANTS:

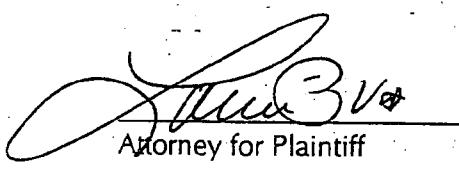
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THE ENCLOSED COMPLAINT IN
EJECTMENT WITHIN TWENTY (20) DAYS
FROM SERVICE HEREOF OR A DEFAULT
JUDGMENT MAY BE ENTERED AGAINST
YOU

I hereby certify this to be a true
and attested copy of the original
statement filed in this case.

APR 20 2000

Attest.


William J. Shan
Prothonotary


Attorney for Plaintiff

COMPLAINT IN EJECTMENT

NOTICE

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**PROTHONOTOARY
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
(814) 765-2641 EXT. 20**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

NATIONAL CITY MORTGAGE CO., successor by :
merger to INTEGRA MORTGAGE COMPANY, assignee :
of LANDMARK SAVINGS ASSOCIATION, assignee of :
FAMILY HOME MORTGAGE,

NO.

Plaintiff,

vs.

RONALD M. MCCULLOUGH and LISA L.
MCCULLOUGH n/k/a LISA L. FALISEC, husband and
wife,

Defendants.

COMPLAINT IN EJECTMENT

AND NOW, comes the above-captioned Plaintiff, National City Mortgage Co., et
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1. The Plaintiff is a corporation having a principal place of business located at
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2. The Defendants are individuals, *sui juris*, whose last known address was Box
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3. On October 3, 1990, the Plaintiff's predecessor in title lent to Defendants
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Volume 1367, page 124.

4. The premises secured by the mortgage are:

See description attached hereto as Exhibit "A".

5. The mortgage provides generally that in the event of default of payment and/or installment of principal and/or interest, inter alia, that it shall be lawful for Plaintiffs to institute, inter alia, an action in mortgage foreclosure.

6. Since October 1, 1998, the mortgage has been in default by reason of the failure of the mortgagors to make appropriate payments.

7. An action in mortgage foreclosure was instituted in the Court of Common Pleas of Clearfield County at No. 99-385-CD, and ultimately a Sheriff's Sale occurred on October 1, 1999.

8. Plaintiff has been caused to expend various sums of money in an effort to pursue this action and in addition, has incurred substantial losses in money as a result of Defendants' occupancy of the property and the termination of appropriate mortgage payments and/or other payments.

9. Defendants and/or all other occupants continue to occupy the said premises described in Exhibit "A".

WHEREFORE, Plaintiff prays Your Honorable Court enter Judgment in favor of the Plaintiff, National City Mortgage Co., et al, for sole possession of the property and vesting the title of said premises to the Plaintiff as prayed for in the Complaint.

Respectfully submitted,

LOUIS P. VITTI & ASSOCIATES, P.C.

By:

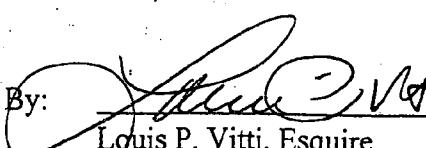

Louis P. Vitti, Esquire
Attorney for Plaintiff

Exhibit "A"

ALL those certain lots or parcels of land situate, lying and being in the Borough of Burnside, Clearfield County, Pennsylvania, bounded and described as follows:

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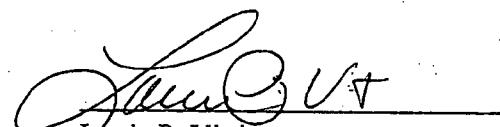
SECOND PIECE: All that certain lot of ground situate in the Borough of Burnside, situate on the south side of public road leading from Burnside to New Washington; Beginning at a post on said road where the road known as the Coal Bank branches from the said Burnside and New Washington road; then along said Burnside New Washington road one hundred sixty (160) feet to a post; then south fifty (50) feet to a post on the Coal Bank road; then along the northern edge of said Coal Bank road one hundred sixty (160) feet to place of beginning, containing 4000 square feet and being a three cornered lot.

BEING the same that Ronald M. McCullough and Lisa L. McCullough, husband and wife, and the mortgagors herein, acquired by Deed dated October 2, 1990 from James H. Watson and Cindy Watson, husband and wife, and such deed to be forthwith recorded.

VERIFICATION

AND NOW Louis P. Vitti verifies that the statements made in this Complaint in Ejectment are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. 4904, relating to unsworn falsification to authorities.

By virtue of the fact that the Plaintiff is outside the jurisdiction of the court and the verification cannot be obtained within the time allowed for the filing of this pleading, the pleading is submitted by counsel having sufficient knowledge, information and belief based upon the information provided him by the Plaintiff.



Louis P. Vitti

Dated: April 17, 2000

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
INTEGRA MORTGAGE COMPANY, successor to
NATIONAL CITY MORTGAGE COMPANY, CIVIL DIVISION
successor by merger to INTEGRA

MORTGAGE COMPANY, assignee of NO. 00-466-CD
LANDMARK SAVINGS ASSOCIATION, assignee of
assignee of FAMILY HOME MORTGAGE,

**PRAECLPICE FOR WRIT OF
POSSESSION AND AFFIDAVIT OF
LAST KNOWN ADDRESS**

RONALD M. MCCULLOUGH and LISA L.
MCCULLOUGH, Plaintiff
vs. FALISEC, husband and wife
Code EJECTMENT

81 vs. 61 Defendants Filed on behalf of
Plaintiff

RONALD M. MCCULLOUGH and LISA L.
L. MCCULLOUGH, n/k/a LISA L.
FALISEC, husband and wife, CLEARFIELD COUNTY, Plaintiff
Counsel of record for this

31 Louis P. Vitti, Esquire
Defendants PA I.D. #3810
Borough of Buena, County of Clearfield, Pennsylvania
Supreme Court #01072
thereon a dwelling known as Box 351 Buena, PA 15721, File No. 2-A13-28 E-2-
A13-29.
Louis P. Vitti & Assoc., P.C.
916 Fifth Avenue
Pittsburgh, PA 15219

FILED

JUN 28 2000

William A. Shaw
Prothonotary

6/28/00
Louis P. Vitti, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

NATIONAL CITY MORTGAGE CO., successor by
merger to INTEGRA MORTGAGE COMPANY, assignee
of LANDMARK SAVINGS ASSOCIATION, assignee of
FAMILY HOME MORTGAGE,

NO. 00-466-CD

Plaintiff,

vs.

RONALD M. MCCULLOUGH and LISA L.
MCCULLOUGH, n/k/a LISA L. FALISEC, husband and
wife,

Defendants.

AFFIDAVIT

I, Louis P. Vitti, do hereby swear that, to the best of my knowledge, information
and belief, the Defendant(s), Ronald M. McCullough and Lisa L. McCullough, n/k/a Lisa L.
Falisec, is/are the owners of the real property that the Plaintiff seeks to execute on. That the
Defendant's last known address is Lisa L. McCullough at Box 331, Burnside, PA 15721-0331
and Ronald M. McCullough at R.D. #1, Box 38, Arcadia, PA 15712.



Louis P. Vitti, Esquire

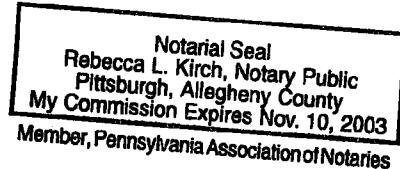
SWORN TO and subscribed

before me this 23rd day

of June, 2000.



Notary Public



FILED

JUN 28 2000
17133 (Cath)
William A. Shaw
Prothonotary

With pd
500.00

books to be
acc shewd

5 weeks to sue
E. H. S.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
CIVIL DIVISION

WRIT OF POSSESSION

NATIONAL CITY MORTGAGE CO.

Plaintiff

vs.

No. 00-466-CD

RONALD M. MCCLULLOUGH and

LISA L. MCCULLOUGH, n/k/a

LISA L. FALISEC, husband & wife

Defendant

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

To the Sheriff of Clearfield County:

(1) To satisfy the judgment for possession in the above matter you
are directed to deliver possession of the following described property to:
National City Mortgage Co.

(specifically describe property)
Property situate in Borough of Burnside, Co. of Clearfield, PA. Having
erected theron a dwelling known as Box 331, Burnside, PA 15721. Being
Parcel No. 2-A13-28 & 2-A13-29.

(2) To satisfy the costs against Ronald M. McCullough and Lisa L.
McCullough, n/k/a Lisa L. Falisec, husband and wife
you are directed to levy upon the following property
(Listed above)
of Ronald M. McCullough and Lisa L. McCullough, n/k/a Lisa L. Falisec, H&W
and sell his interest therein.

William A. Shaw, Prothonotary

Received writ this _____ day
of _____ A.D.,
19 _____ at _____ A.M. P.M.

Sheriff

Use Atty _____
Use Plff _____
Satisfaction _____
Atty Comm _____
Sheriff _____

Louis P. Vitti, Esq.
Attorney for Plaintiff(s)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NATIONAL CITY MORTGAGE CO.,
successor by merger to INTEGRA
MORTGAGE COMPANY, assignee of
LANDMARK SAVINGS ASSOCIATION,
assignee of FAMILY HOME MORTGAGE,

CIVIL DIVISION

NO. 00-466-CD

**PRAECIPE FOR DEFAULT
JUDGMENT AND CERTIFICATION
OF MAILING AND AFFIDAVIT OF
NON-MILITARY SERVICE**

Plaintiff,

vs.

RONALD M. MCCULLOUGH and LISA
L. MCCULLOUGH, n/k/a LISA L.
FALISEC, husband and wife,

Code EJECTMENT

Filed on behalf of
Plaintiff

Counsel of record for this
party:

Louis P. Vitti, Esquire
PA I.D. #3810
Supreme Court #01072

Louis P. Vitti & Assoc., P.C.
916 Fifth Avenue
Pittsburgh, PA 15219

(412) 281-1725

FILED

JUN 28 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

NATIONAL CITY MORTGAGE CO., successor by
merger to INTEGRA MORTGAGE COMPANY, assignee
of LANDMARK SAVINGS ASSOCIATION, assignee of
FAMILY HOME MORTGAGE,

NO. 00-466-CD

Plaintiff,

vs.

RONALD M. MCCULLOUGH and LISA L.
MCCULLOUGH, n/k/a LISA L. FALISEC, husband and
wife,

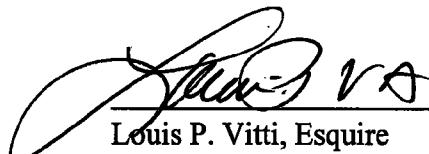
Defendants.

PRAECIPE FOR DEFAULT JUDGMENT

TO: PROTHONOTARY OF CLEARFIELD COUNTY

Please enter judgment for possession and/or ejectment as a result of the Defendants'
failure to file an Answer and/or a responsive pleading. Property address being Box 331,
Burnside, PA 15721-0331. Situate in Borough of Burnside, Clearfield County,
Commonwealth of Pennsylvania. Having erected thereon a dwelling known as Box 331,
Burnside, PA 15721-0331. Being Parcel No. 2-A13-28 & 2-A13-29..

LOUIS P. VITTI & ASSOCIATES, P.C.



Louis P. Vitti, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

NATIONAL CITY MORTGAGE CO., successor by
merger to INTEGRA MORTGAGE COMPANY, assignee
of LANDMARK SAVINGS ASSOCIATION, assignee of
FAMILY HOME MORTGAGE,

NO. 00-466-CD

Plaintiff,

vs.

RONALD M. MCCULLOUGH and LISA L.
MCCULLOUGH, n/k/a LISA L. FALISEC, husband and
wife,

Defendants.

CERTIFICATION OF MAILING

I, Louis P. Vitti, do hereby certify that a Notice of Intention to Take Judgment was mailed to the Defendant(s), in the above-captioned case on June 12, 2000, giving ten (10) day notice that judgment would be entered should no action be taken.

LOUIS P. VITTI & ASSOCIATES, P.C.

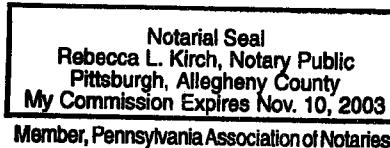
BY 
Louis P. Vitti, Esquire
Attorney for Plaintiff

SWORN to and subscribed

before me this 23rd day

of June, 2000.


Rebecca L. Kirch
Notary Public



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

NATIONAL CITY MORTGAGE CO., successor by merger to
INTEGRA MORTGAGE COMPANY, assignee of LANDMARK
SAVINGS ASSOCIATION, assignee of FAMILY HOME
MORTGAGE,

NO. 00-466-CD

Plaintiff,

vs.

RONALD M. MCCULLOUGH and LISA L. MCCULLOUGH,
n/k/a LISA L. FALISEC, husband and wife,

Defendants.

IMPORTANT NOTICE

TO: Lisa L. McCullough AND Ronald M. McCullough
Box 331 R.D. #1, Box 38
Burnside, PA 15721-0331 Arcadia, PA 15712

Date of Notice: June 12, 2000

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS NOTICE TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

PROTHONOTARY
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830

(814) 765-2641 - EXT. 20

LOUIS P. VITTI & ASSOCIATES, P.C.

BY:


Louis P. Vitti, Esquire
Attorney for Plaintiff
916 Fifth Avenue
Pittsburgh, PA 15219

** THE DEBT COLLECTOR IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

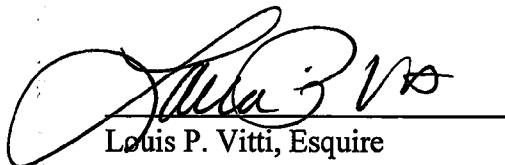
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA, SS:

COUNTY OF CLEARFIELD COUNTY,

BEFORE me, the undersigned authority, personally appeared Louis P. Vitti, Esquire, who, being duly sworn according to law, deposes and says that he is advised and believes that DEFENDANT(S) is/are not presently in the active military service of the United States of America and not members of the Army of the United States, United States Navy, the Marine Corps, or the Coast Guard, and not officers of the Public Health Service detailed by proper authority for duty with the Army or Navy; nor engaged in any active military service or duty with any military or naval units covered by the Soldiers and Sailors Civil Relief Act of 1940 and designated therein as military service, and to the best of this affiant's knowledge is/are not enlisted in military service covered by said act, and that the averments herein set forth, insofar as they are within his knowledge, are correct, and true; and insofar as they are based on information received from others, are true and correct as he verily believes.

This Affidavit is made under the provisions of the Soldiers and Sailors Civil Relief Act of 1940.



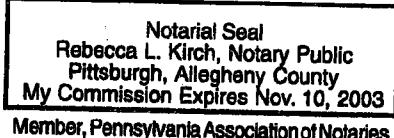
Louis P. Vitti, Esquire

SWORN to and subscribed

before me this 23rd day

of June, 2000.

Rebecca L. Kirch
Notary Public



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JUN 28 2000 (17133) City of McCullough
William A. Shaw
Prothonotary
not to be used
not to be used

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१८८५ विजय विजय

COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

NATIONAL CITY MORTGAGE CO., successor by
merger to INTEGRA MORTGAGE COMPANY, assignee
of LANDMARK SAVINGS ASSOCIATION, assignee of
FAMILY HOME MORTGAGE,

NO. 00-466-CD

Plaintiff,

vs.

RONALD M. MCCULLOUGH and LISA L.
MCCULLOUGH, n/k/a LISA L. FALISEC, husband and
wife.

Defendants.

NOTICE OF ORDER, DECREE OR JUDGMENT

TO: DEFENDANT

You are hereby notified that a judgment was entered in the above-captioned proceeding
on the 28th day of June, 2000.

Judgment is as follows: Be advised that judgment was entered in default of an Answer
for Possession and in eviction and/or ejectment in the above-mentioned case.



Deputy

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA
CIVIL DIVISION

WRIT OF POSSESSION

NATIONAL CITY MORTGAGE CO.

Plaintiff

vs.

RONALD M. MCCLULLOUGH and

No. 00-466-CD

LISA L. MCCULLOUGH, n/k/a

LISA L. FALISEC, husband & wife

Defendant

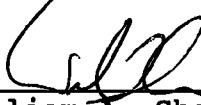
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

To the Sheriff of Clearfield County:

(1) To satisfy the judgment for possession in the above matter you
are directed to deliver possession of the following described property to:
National City Mortgage Co.

(specifically describe property)
Property situate in Borough of Burnside, Co. of Clearfield, PA. Having
erected theron a dwelling known as Box 331, Burnside, PA 15721. Being
Parcel No. 2-A13-28 & 2-A13-29.

(2) To satisfy the costs against Ronald M. McCullough and Lisa L.
McCullough, n/k/a Lisa L. Falisec, husband and wife
you are directed to levy upon the following property
(Listed above)
of Ronald M. McCullough and Lisa L. McCullough, n/k/a Lisa L. Falisec, H&W
and sell his interest therein.


William A. Shaw, Prothonotary

Received writ this 29th day
of June A.D.
2000 at 9:03 A.M. P.M.

Chester A. Hawkins

Sheriff by Margaret H. Putt

Use Atty _____
Use Plff _____
Satisfaction _____
Atty Comm _____
Sheriff _____

Louis P. Vitti, Esq.
Attorney for Plaintiff(s)



**Sheriff's Office
Clearfield County**

CLEARFIELD COUNTY FAX
(814) 765-6089

CHESTER A. HAWKINS
SHERIFF

SUITE 116
1 NORTH SECOND STREET - COURTHOUSE
CLEARFIELD, PENNSYLVANIA 16830

DARLENE SHULTZ
CHIEF DEPUTY

MARILYN HAMM
DEPT CLERK

MARGARET PUTT
OFFICE MANAGER

PETER F. SMITH
SOLICITOR

DEPUTATION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NATIONAL CITY MORTGAGE CO., successor by
merger to INTEGRA MORTGAGE COMPANY, assignee NO. 00-466-CD
of LANDMARK SAVINGS ASSOCIATION, assignee of
VS FAMILY HOME MORTGAGE

ACTION: WRIT OF POSSESSION

RONALD M. McCULLOUGH and LISA L.
McCULLOUGH, N/k/a LISA L. FLAISEC, Husband and wife

SERVE BY: ASAP

OR

HEARING DATE:

SERVE: RONALD M. McCULLOUGH

**ADDRESS: RD #1 BOX 38
ARCADIA, PA 15712**

Know all men by these presents, that I, CHESTER A. HAWKINS,
HIGH SHERIFF of CLEARFIELD COUNTY, State of Pennsylvania, do hereby
deputize the SHERIFF of INDIANA County to execute this writ.

This deputation being made at the request and risk of the plaintiff
this 11th day of JULY 2000.

COPY

Respectfully,
Chester A. Hawkins
by Margaret N. Putt
CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY

MAKE REFUND PAYABLE TO: LOUIS P. VITTI, ESQ.

NOW, July 11, 2000, Sheriff Donald L. Beckwith of Indiana County was deputized by Chester A. Hawkins, Sheriff of Clearfield County to serve the within Writ of Possession on Ronald McCullough, defendant.

NOW, July 12, 2000, Deputy went to Box 331, Burnside, PA to serve Lisa L. McCullough, defendant, house was found empty.

NOW, July 13, 2000, served Writ of Possession on Ronald M. McCullough, defendant, by deputizing the Sheriff of Indiana County. The return of Sheriff Beckwith is hereto attached and made part of this return.

NOW, July 26, 2000, return Writ as Ronald M. McCullough being served, Lisa L. McCullough was not found, paid costs from advance and made refund of unused advance to the attorney.

SHERIFF HAWKINS \$51.60
SURCHARGE 20.00
PAID BY ATTORNEY

SWORN and SUBSCRIBED BEFORE ME
THIS 26th DAY OF JULY, 2000.

William A. Shaw

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2002
Clearfield Co., Clearfield, PA.

SO ANSWERS,
Chester A. Hawkins
by Margaret H. Putt
CHESTER A. HAWKINS,
SHERIFF

FILED

JUL 26 2000
01027 AM
William A. Shaw
Prothonotary
WAS

INDIANA COUNTY SHERIFF



825 PHILADELPHIA STREET
INDIANA, PENNSYLVANIA 15701
(724) 465-3930
FAX: (724) 465-3937

Donald L. Beckwith

Sheriff

David J. Rostis
Chief Deputy Sheriff

PAGE: 484

CASE NUMBER: 00-466-CD

AFFIDAVIT OF SERVICE

NOW, July 13, 2000 **AT** 9:00 P **M.** **SERVED**

THE WITHIN **WRIT OF POSSESSION (PRAECIPE)**

UPON RONALD MCCULLOUGH

AT R.D. # 1, Box 38, Arcadia, PA 15712

BY HANDING TO Robert McCullough, Brother of Defendant, person in charge

A TRUE AND CORRECT COPY(S) OF THE WITHIN Praeclipe for Writ of Possession

AND MAKING KNOWN TO HIM/HER/ THEM THE CONTENTS THEREOF:

NOW - AFTER DILIGENT SEARCH AND INQUIRY

FAILED TO FIND THE WITHIN

WITHIN MY BAILIWICK. REASON UNABLE TO LOCATE: _____

SO ANSWERS:

Donald J. Beckwith
DONALD J. BECKWITH, SHERIFF

BY:

CARY L. WISSINGER DEPUTY

SWORN AND SUBSCRIBED BEFORE ME.
THIS DAY OF

COSTS: \$ 49.00 Paid