

01-306-CD  
AMERIQUEST MORTGAGE COMPANY et al -vs- MARK A. BIGGIE et al

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

AMERIQUEST MORTGAGE COMPANY A  
DELAWARE CORPORATION ASSIGNEE OF  
NORWEST BANK OF MINNESOTA N.A.  
AS TRUSTEE OF AMERSCO RESIDENTIAL  
SECURITIES CORPORATION, MORTGAGE  
PASS-THROUGH CERTIFICATES, SERIES  
1998-2 UNDER THE POOLING AND  
SERVICING AGREEMENT DATED AS OF  
JUNE 1, 1998

CIVIL DIVISION

NO. 01-306-60

COMPLAINT IN EJECTMENT

CODE  
MORTGAGE FORECLOSURE  
EViction

FILED ON BEHALF OF  
PLAINTIFF

COUNSEL OF RECORD FOR  
THIS PARTY:

LESLIE J. CARSON, JR.  
6378 LANCASTER AVENUE  
PHILADELPHIA, PA 19151  
ID #05111

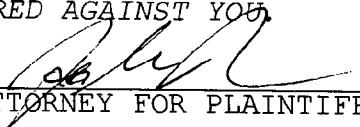
215-568-1980

DEFENDANT (s).

TO EACH DEFENDANT:

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.

By:

  
ATTORNEY FOR PLAINTIFF

FILED

MAR 02 2001

William A. Shaw  
Prothonotary

LESLIE J. CARSON, JR., ESQUIRE  
ATTORNEY I.D. NO. 05111  
6378 LANCASTER AVENUE  
PHILADELPHIA, PA 19151  
TELEPHONE (215) 568-1980

ATTORNEY FOR PLAINTIFF

AMERIQUEST MORTGAGE COMPANY A  
DELAWARE CORPORATION ASSIGNEE  
OF NORWEST BANK MINNESOTA  
N.A., AS TRUSTEE OF AMRESCO  
RESIDENTIAL SECURITIES  
CORPORATION, MORTGAGE PASS-  
THROUGH CERTIFICATES, SERIES  
1998-2 UNDER THE POOLING AND  
SERVICING AGREEMENT DATED AS  
OF JUNE 1, 1998  
505 S. MAIN STREET, SUITE 600  
ORANGE, CA 92868

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 01-306-CO

*I HEREBY CERTIFY THE WITHIN  
TO BE TRUE AND CORRECT COPY  
OF THE ORIGINAL FILED OF RECORD*

*LESLIE J. CARSON, JR.*

PLAINTIFF,

VS.

MARK A. BIGGIE  
ELEANOR M. BIGGIE  
ALL TENANTS/OCCUPANTS  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

DEFENDANT(s).

#### COMPLAINT IN EJECTMENT

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 ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR 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 THE PAPER TO YOUR LAWYER AT ONCE. IF YOU DO 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.

CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
814-765-2641

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

AMERIQUEST MORTGAGE COMPANY A  
DELAWARE CORPORATION ASSIGNEE  
OF NORWEST BANK MINNESOTA  
N.A., AS TRUSTEE OF AMERESCO  
RESIDENTIAL SECURITIES  
CORPORATION, MORTGAGE PASS-  
THROUGH CERTIFICATES, SERIES  
1998-2 UNDER THE POOLING AND  
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OF JUNE 1, 1998  
505 S. MAIN STREET, SUITE 600  
ORANGE, CA 92868

PLAINTIFF,

vs.

MARK A. BIGGIE  
ELEANOR M. BIGGIE  
ALL TENANTS/OCCUPANTS  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO.

DEFENDANT(s).

**COMPLAINT IN EJECTMENT**

1. The plaintiff is the corporation named above, having its principal office as stated on the preceding page.

2. The Defendants and all others who reside at the premises are those named above and they reside at the address stated thereon, which are, hereinafter referred to as the Premises.

3. The Premises which are described in Exhibit "A" attached hereto and incorporated herein by reference, were sold at Sheriff's Sale on February 2, 2001 by the Sheriff of the County in which they are located, after due advertisement according to law, under and by virtue of a Writ of Execution issued to satisfy

a judgment entered in the Court of Common Pleas of said County at the suit of: Norwest Bank Minnesota, N.A. et al. - vs.- MARK A. BIGGIE AND ELEANOR M. BIGGIE. The case number of said judgment is: 00-1022-CD.

4. The Premises were purchased by the plaintiff at the Sheriff's Sale pursuant to an assignment of bid.

5. The Plaintiff acquired title to the premises on the date of and by virtue of said Sheriff's Sale, pursuant to an assignment of the bid and is still the real owner of said premises.

6. The persons in possession of the premises are the defendants in this action and are occupying the premises without right and without claim to title.

7. Plaintiff has demanded possession of the Premises from the defendants who have refused to deliver up the possession thereof.

WHEREFORE, the Plaintiff demands judgment for immediate possession of the premises, issuance of a Writ of Possession and a judgment of its costs and disbursements in this action.

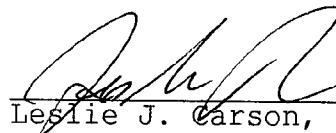
BY:

  
Leslie J. Carson, Jr., Esquire  
Attorney for Plaintiff

VERIFICATION

The undersigned hereby verifies that he is the attorney for Plaintiff, a corporation; that he is authorized to make this verification and does so because Plaintiff corporation must verify through agents and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the facts set forth in the foregoing pleading are true and correct to the best of his knowledge, information, and belief and the source of his information is public records and reports of Plaintiff's agents.

I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.



Leslie J. Carson, Jr., Esquire  
Attorney for Plaintiff

Dated: 2/26/01

ALL THAT CERTAIN LOT OR PIECE OF LAND SITUATE AND LYING IN THE CITY OF DUBOIS, CLEARFIELD COUNTY AND COMMONWEALTH OF PENNSYLVANIA BOUNDED AND DESCRIBED AS FOLLOWS, TO WIT:

KNOWN AS LOT NO. 58 AS PER LONG'S ADDITION TO DEBOIS, BEING 73-1/2 FEET WIDE ON HARBACH AVENUE, NOW PARK AVENUE, BY 150 FEET TO AN ALLEY AND ABOUT 77-1/2 FEET WIDE ON SAID ALLEY; BOUNDED ON THE NORTH BY HARBACH AVENUE, NOW PARK AVENUE, ON THE EAST BY LAND FORMERLY OF JOHN DUBOIS; ON THE SOUTH BY AN ALLEY; AND ON THE WEST BY LOT NO. 59 IN SAID ADDITION.

BEING TAX NO. 7.2-4.997.

EXHIBIT "A"

**FILED**

REC'D MAR 02 2001  
MAY 21 2001 atty. Carson pd \$80.00  
William A. Shaw  
Prothonotary  
cc. Sheriff

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 10757

AMERIQUEST MORTGAGE COMPANY

01-306-CD

VS.

BIGGIE, MARK A., ELEANOR M. AI

**COMPLAINT IN EJECTMENT**

**SHERIFF RETURNS**

**NOW MARCH 19, 2001 AT 5:19 PM EST SERVED THE WITHIN COMPLAINT IN EJECTMENT ON MARK A. BIGGIE, DEFENDANT AT EMPLOYMENT, TRIANGLE AUTO SPRING CO., ROCKTON, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO MARK BIGGIE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.**

**SERVED BY: SNYDER**

**NOW MARCH 19, 2001 AT 5:19 PM EST SERVED THE WITHIN COMPLAINT IN EJECTMENT ON TENANTS/OCCUPANTS, DEFENDANT AT EMPLOYMENT, TRIANGLE AUTO SPRING, ROCKTON, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO MARK BIGGIE, ONLY OCCUPANT OR RESIDENT, A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.**

**SERVED BY: SNYDER**

**NOW MARCH 19, 2001 AT 5:46 PM EST SERVED THE WITHIN COMPLAINT IN EJECTMENT ON ELEANOR M. BIGGIE, DEFENDANT AT RESIDENCE, #24 GATEWAY GARDENS, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ELEANOR BIGGIE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.**

**SERVED BY: SNYDER**

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**Return Costs**

<b>Cost</b>	<b>Description</b>
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<b>50.44</b>	<b>SHFF. HAWKINS PAID BY: ATTY.</b>
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<b>30.00</b>	<b>SURCHARGE PAID BY: ATTY.</b>
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**FILED**

**MAR 21 2001**

**013:40pm**

**William A. Shaw  
Prothonotary**

*EAB*

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 10757

AMERIQUEST MORTGAGE COMPANY

01-306-CD

VS.

BIGGIE, MARK A., ELEANOR M. AI

**COMPLAINT IN EJECTMENT**

**SHERIFF RETURNS**

---

Sworn to Before Me This

So Answers,

21 Day Of March 2001

*Chester A. Hawkins*  
*My Marly Hams*  
Chester A. Hawkins  
Sheriff

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

LESLIE J. CARSON, JR., ESQUIRE  
ATTORNEY I.D. NO. 05111  
6378 LANCASTER AVENUE  
PHILADELPHIA, PA 19151  
TELEPHONE 215-568-1980

ATTORNEY FOR PLAINTIFF

AMERIQUEST MORTGAGE COMPANY A  
DELAWARE CORPORATION ASSIGNEE  
OF NORWEST BANK MINNESOTA  
N.A., AS TRUSTEE OF AMRESCO  
RESIDENTIAL SECURITIES  
CORPORATION, MORTGAGE PASS-  
THROUGH CERTIFICATES, SERIES  
1998-2 UNDER THE POOLING AND  
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OF JUNE 1, 1998  
505 S. MAIN STREET, SUITE 600  
ORANGE, CA 92868

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO.01-306-CD

PLAINTIFF,

VS.

MARK A. BIGGIE  
ELEANOR M. BIGGIE  
ALL TENANTS/OCCUPANTS  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

DEFENDANT(s)

**FILED**

APR 24 2001

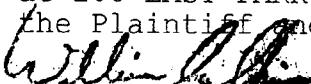
William A. Shaw  
Prothonotary

**PRAECIPE FOR JUDGMENT FOR POSSESSION  
FOR FAILURE TO ANSWER**

Enter Judgment in Ejectment for immediate possession of the Premises located at 208 EAST PARK AVENUE, DUBOIS, PA 15801 in favor of Plaintiff and against the Defendants above captioned for failure to file an answer to Plaintiff's Complaint within 20 days from service of the Complaint.

LESLIE J. CARSON, JR., ESQUIRE  
Attorney for Plaintiff

AND NOW, this 23rd day of ~~MARCH~~ April, 2001, judgment for immediate possession of the Premises located at 208 EAST PARK AVENUE, DUBOIS, PA 15801 entered in favor of the Plaintiff and against the Defendant(s).

  
Pro. Prothy.

LESLIE J. CARSON, JR., ESQUIRE  
ATTORNEY I.D. NO. 05111  
6378 LANCASTER AVENUE  
PHILADELPHIA, PA 19151  
TELEPHONE 215-568-1980

ATTORNEY FOR PLAINTIFF

AMERIQUEST MORTGAGE COMPANY A  
DELAWARE CORPORATION ASSIGNEE  
OF NORWEST BANK MINNESOTA  
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COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO: 01-306-CD

PLAINTIFF,

VS.

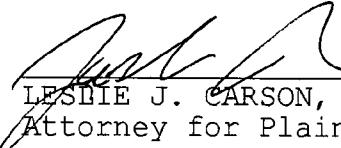
MARK A. BIGGIE  
ELEANOR M. BIGGIE  
ALL TENANTS/OCCUPANTS  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

DEFENDANT(s)

CERTIFICATION OF MAILING NOTICE UNDER RULE 237.1

The undersigned hereby certifies that a Written Notice of Intention to File a Praeclipe for the Entry of Default Judgment was mailed to each party against whom judgment is to be entered and to the attorney of record of each such party, if any, after the default occurred and at least (10) days prior to the date of the filing of the Praeclipe. This Notice was sent on **APRIL 09, 2001**. A copy of this Notice is attached hereto.

Dated: 4/20/01

  
LESLIE J. CARSON, JR., ESQ.  
Attorney for Plaintiff

OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS  
CLEARFIELD COUNTY  
ONE NORTH 2<sup>ND</sup> STREET  
CLEARFIELD, PA 16830

WILLIAM A. SHAW  
Prothonotary

Date of Notice 04/09/01

TO: ELEANOR M. BIGGIE  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

---

AMERIQUEST MORTGAGE COMPANY	:	COURT OF COMMON PLEAS
		CLEARFIELD COUNTY
Plaintiff,	:	
	:	
	:	
	:	
MARK A. BIGGIE &	:	
ELEANOR M. BIGGIE &	:	
ALL TENANTS/OCCUPANTS	:	
Defendant(s).	:	

---

NOTICE, RULE 237.5

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSE OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGEMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
814-765-2641

---

LESLIE J. CARSON, JR., ESQUIRE  
Attorney for Plaintiff  
1150 Robinson Building  
Philadelphia, PA 19102  
(215) 568-1980

OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS  
CLEARFIELD COUNTY  
ONE NORTH 2<sup>ND</sup> STREET  
CLEARFIELD, PA 16830

WILLIAM A. SHAW  
Prothonotary

Date of Notice 04/09/01

TO: ALL TENANTS/OCCUPANTS  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

---

AMERIQUEST MORTGAGE COMPANY	:	COURT OF COMMON PLEAS
		CLEARFIELD COUNTY
Plaintiff,		
	:	
MARK A. BIGGIE &	:	
ELEANOR M. BIGGIE &		
ALL TENANTS/OCCUPANTS	:	
Defendant(s).		
	:	

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NOTICE, RULE 237.5

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CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
814-765-2641

---

LESLIE J. CARSON, JR., ESQUIRE  
Attorney for Plaintiff  
1150 Robinson Building  
Philadelphia, PA 19102  
(215) 568-1980

OFFICE OF THE PROTHONOTARY  
COURT OF COMMON PLEAS  
CLEARFIELD COUNTY  
ONE NORTH 2<sup>ND</sup> STREET  
CLEARFIELD, PA 16830

WILLIAM A. SHAW  
Prothonotary

Date of Notice 04/09/01

TO: MARK A. BIGGIE  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

---

AMERIQUEST MORTGAGE COMPANY	:	COURT OF COMMON PLEAS
		CLEARFIELD COUNTY
Plaintiff,	:	
	:	
	:	
	:	
MARK A. BIGGIE &	:	
ELEANOR M. BIGGIE &	:	
ALL TENANTS/OCCUPANTS	:	
Defendant(s).	:	
	:	
	:	

---

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CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
814-765-2641

---

LESLIE J. CARSON, JR., ESQUIRE  
Attorney for Plaintiff  
1150 Robinson Building  
Philadelphia, PA 19102  
(215) 568-1980

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10757

AMERIQUEST MORTGAGE COMPANY

01-306-CD

VS.

BIGGIE, MARK A., ELEANOR M. AI

COPY

COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

---

NOW MARCH 19, 2001 AT 5:19 PM EST SERVED THE WITHIN COMPLAINT IN EJECTMENT ON MARK A. BIGGIE, DEFENDANT AT EMPLOYMENT, TRIANGLE AUTO SPRING CO., ROCKTON, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO MARK BIGGIE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: SNYDER

NOW MARCH 19, 2001 AT 5:19 PM EST SERVED THE WITHIN COMPLAINT IN EJECTMENT ON TENANTS/OCCUPANTS, DEFENDANT AT EMPLOYMENT, TRIANGLE AUTO SPRING, ROCKTON, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO MARK BIGGIE, ONLY OCCUPANT OR RESIDENT, A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: SNYDER

NOW MARCH 19, 2001 AT 5:46 PM EST SERVED THE WITHIN COMPLAINT IN EJECTMENT ON ELEANOR M. BIGGIE, DEFENDANT AT RESIDENCE, #24 GATEWAY GARDENS, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ELEANOR BIGGIE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: SNYDER

---

Return Costs

Cost	Description
------	-------------

50.44	SHFF. HAWKINS PAID BY: ATTY.
-------	------------------------------

30.00	SURCHARGE PAID BY: ATTY.
-------	--------------------------

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

AMERIQUEST MORTGAGE COMPANY

VS.

BIGGIE, MARK A., ELEANOR M. AI

01-306-CD

Sheriff Docket # 10757

10757

COPY

## COMPLAINT IN EJECTMENT

## SHERIFF RETURNS

Sworn to Before Me This

### So Answers,

Day Of 2001

Charles Hansen

**Chester A. Hawkins**  
**Sheriff**

LESLIE J. CARSON, JR., ESQUIRE  
ATTORNEY I.D. NO. 05111  
6378 LANCASTER AVENUE  
PHILADELPHIA, PA 19151  
TELEPHONE 215-568-1980

ATTORNEY FOR PLAINTIFF

AMERIQUEST MORTGAGE COMPANY A  
DELAWARE CORPORATION ASSIGNEE  
OF NORWEST BANK MINNESOTA  
N.A., AS TRUSTEE OF AMRESCO  
RESIDENTIAL SECURITIES  
CORPORATION, MORTGAGE PASS-  
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505 S. MAIN STREET, SUITE 600  
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PLAINTIFF,

vs.

MARK A. BIGGIE  
ELEANOR M. BIGGIE  
ALL TENANTS/OCCUPANTS  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

DEFENDANT(s).

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 01-306-CD

CERTIFICATION OF ADDRESS

I hereby certify that the correct address of the judgment creditor (Plaintiff) and that the last known address of the judgment debtor (Defendants) are as above.

  
LESLIE J. CARSON, JR., ESQ.  
Attorney for Plaintiff

LESLIE J. CARSON, JR., ESQ.  
ATTORNEY I.D. NO. 05111  
6378 LANCASTER AVENUE  
PHILADELPHIA, PA 19151  
TELEPHONE 215 - 568-1980

ATTORNEY FOR PLAINTIFF

AMERIQUEST MORTGAGE COMPANY A  
DELAWARE CORPORATION ASSIGNEE  
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COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 01-306-CD

PLAINTIFF,

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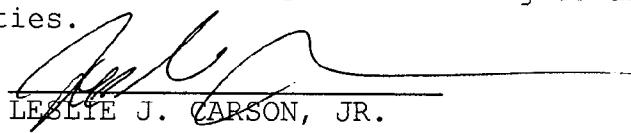
DEFENDANT(s).

VERIFICATION OF NON-MILITARY SERVICE

The undersigned, LESLIE J. CARSON, Esquire, attorney for Plaintiff, hereby verifies that the averments herein are based upon investigation made and records maintained by AMERIQUEST MORTGAGE COMPANY, either as Plaintiff or as servicing agent of the Plaintiff herein and that the above defendants are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended, and that the age of and last known residence and employment of each defendant are as follows:

DEFENDANT: MARK A. BIGGIE  
ELEANOR M. BIGGIE  
ALL TENANTS/OCCUPANTS  
AGE: Over 18  
RESIDENCE: 208 EAST PARK AVENUE  
DUBOIS, PA 15801  
EMPLOYMENT: Unknown

I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section §4904 relating to unsworn falsification to authorities.



LESLIE J. CARSON, JR.

**COPY**

OFFICE OF THE PROTHONOTARY  
CLEARFIELD COUNTY  
COURT OF COMMON PLEAS  
ONE NORTH 2<sup>ND</sup> STREET  
CLEARFIELD, PA 16830

WILLIAM SHAW  
Prothonotary

TO: ELEANOR M. BIGGIE  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

AMERIQUEST MORTGAGE COMPANY A  
DELAWARE CORPORATION ASSIGNEE  
OF NORWEST BANK MINNESOTA  
N.A., AS TRUSTEE OF AMRESCO  
RESIDENTIAL SECURITIES  
CORPORATION, MORTGAGE PASS-  
THROUGH CERTIFICATES, SERIES  
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OF JUNE 1, 1998  
505 S. MAIN STREET, SUITE 600  
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PLAINTIFF,

VS.

MARK A. BIGGIE  
ELEANOR M. BIGGIE  
ALL TENANTS/OCCUPANTS  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

DEFENDANT(s).

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 01-306-CD

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

WILLIAM SHAW  
Prothonotary

Judgment by Default

Judgment for Possession

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL: ATTORNEY LESLIE J. CARSON, JR., ESQUIRE, AT THIS TELEPHONE NUMBER (215) 568-1980.

**FILED**

APR 24 2001  
10:14 AM Canon  
William A. Shaw  
Prothonotary  
pd \$20.00

Noticed to Dfs.

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

AMERIQUEST MORTGAGE COMPANY A  
DELAWARE CORPORATION ASSIGNEE  
OF NORWEST BANK MINNESOTA  
N.A., AS TRUSTEE OF AMRESCO  
RESIDENTIAL SECURITIES  
CORPORATION, MORTGAGE PASS-  
THROUGH CERTIFICATES, SERIES  
1998-2 UNDER THE POOLING AND  
SERVICING AGREEMENT DATED AS  
OF JUNE 1, 1998  
505 S. MAIN STREET, SUITE 600  
ORANGE, CA 92868

PLAINTIFF,

vs.

MARK A. BIGGIE  
ELEANOR M. BIGGIE  
ALL TENANTS/OCCUPANTS  
208 EAST PARK AVENUE  
DUBOIS, PA 15801

DEFENDANT(s).

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 01-306-CD

**FILED**

APR 24 2001

William A. Shaw  
Prothonotary

PRAECIPE FOR WRIT OF POSSESSION

TO: WILLIAM SHAW, PROTHONOTARY

Issue writ of execution in the above matter,

- (1) Direct to the sheriff of CLEARFIELD COUNTY:
- (2) Against MARK A. BIGGIE AND ELEANOR M. BIGGIE, ALL  
TENANTS/OCCUPANTS defendant(s)

And

(3) Against \_\_\_\_\_ garnishee;

(4) and index this writ

(a) against \_\_\_\_\_ defendant and  
(b) against \_\_\_\_\_ as a lis pendens  
against real property of the defendant in name of garnishee as follows:

ALL THAT CERTAIN LOT OR PIECE OF LAND SITUATE AND LYING IN THE  
CITY OF DUBOIS, CLEARFIELD COUNTY AND COMMONWEALTH OF  
PENNSYLVANIA BOUNDED AND DESCRIBED AS FOLLOWS, TO WIT:

KNOWN AS LOT NO. 58 AS PER LONG'S ADDITION TO DEBOIS, BEING 73-  
1/2 FEET WIDE ON HARBACH AVENUE, NOW PARK AVENUE, BY 150 FEET TO

AN ALLEY AND ABOUT 77-1/2 FEET WIDE ON SAID ALLEY; BOUNDED ON THE NORTH BY HARBACH AVENUE, NOW PARK AVENUE, ON THE EAST BY LAND FORMERLY OF JOHN DUBOIS; ON THE SOUTH BY AN ALLEY; AND ON THE WEST BY LOT NO. 59 IN SAID ADDITION.

BEING TAX NO. 7.2-4.997.

BEING: 208 EAST PARK AVENUE, DUBOIS, PA 15801

(5) Amount Due  
Interest from \_\_\_\_\_  
(Costs to be added)

\$ Possession  
\$  
\$

  
LESLIE J. CARSON, JR., ESQUIRE  
6378 LANCASTER AVENUE  
PHILADELPHIA, PA 19151  
215-877-0640

WRIT OF POSSESSION

COMMONWEALTH OF PENNSYLVANIA ) ss.  
COUNTY OF CLEARFIELD

TO THE SHERIFF OF SAID COUNTY:

- 1) TO SATISFY THE SAID JUDGMENT FOR POSSESSION IN THE ABOVE CAPTIONED CASE, YOU ARE DIRECTED TO DELIVER TO THE PLAINTIFF(S) POSSESSION OF THE ABOVE DESCRIBED PROPERTY.
- 2) TO SATISFY THE COSTS AGAINST \_\_\_\_\_, YOU ARE DIRECTED TO LEVY UPON ANY PROPERTY OF \_\_\_\_\_ AND SELL HIS OR HER INTEREST THEREIN

DATE: \_\_\_\_\_

PROTHONOTARY / CLERK, CIVIL DIVISION

BY: \_\_\_\_\_  
DEPUTY

FILED

APR 23 2001

1941 Cuson pd  
William A. Shaw  
Prothonotary

520.00

Writ Passions  
to Sheriff

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

WRIT OF POSSESSION

**Ameriquest Mortgage Company  
Norwest Bank of Minnesota, N.A.  
Amersco Residential Securities Corporation**

**COPY**

**Plaintiff(s)**

**Vs.**

**NO.: 2001-00306-CD**

**Mark A. Biggie,  
Eleanor M. Biggie,  
All Tenants/Occupants  
208 East Park Avenue  
DuBois, PA 15801**

**Defendant(s)**

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: Plaintiff(s)

See attached description

- (2) To satisfy the costs against Defendant(s) you are directed to levy upon the above listed property of Defendant(s) and sell his/their interests therein.

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William A. Shaw, Prothonotary

Received writ this \_\_\_\_\_ day of  
\_\_\_\_\_  
A.D. \_\_\_\_\_  
at \_\_\_\_\_ a.m./p.m.

\_\_\_\_\_  
Sheriff

REQUESTING PARTY NAME: Ameriquest Mortgage Company  
ATTORNEY FILING: Leslie J. Carson, Jr., Esquire

ALL THAT CERTAIN LOT OR PIECE OF LAND SITUATE AND LYING IN THE CITY OF DUBOIS, CLEARFIELD COUNTY AND COMMONWEALTH OF PENNSYLVANIA BOUNDED AND DESCRIBED AS FOLLOWS, TO WIT:

KNOWN AS LOT NO. 58 AS PER LONG'S ADDITION TO DEBOIS, BEING 73-1/2 FEET WIDE ON HARBACH AVENUE, NOW PARK AVENUE, BY 150 FEET TO AN ALLEY AND ABOUT 77-1/2 FEET WIDE ON SAID ALLEY; BOUNDED ON THE NORTH BY HARBACH AVENUE, NOW PARK AVENUE, ON THE EAST BY LAND FORMERLY OF JOHN DUBOIS; ON THE SOUTH BY AN ALLEY; AND ON THE WEST BY LOT NO. 59 IN SAID ADDITION.

BEING TAX NO. 7.2-4.997.

**FILED**

APR 24 2001

MHC: <sup>14</sup> Petty Cash on ac \$20.00  
William A. Shaw  
Prothonotary

Writ Presented to  
Sheriff

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

WRIT OF POSSESSION

Ameriquest Mortgage Company  
Norwest Bank of Minnesota, N.A.  
Amersco Residential Securities Corporation

**Plaintiff(s)**

**Vs.**

**NO.: 2001-00306-CD**

**Mark A. Biggie,  
Eleanor M. Biggie,  
All Tenants/Occupants  
208 East Park Avenue  
DuBois, PA 15801**

**Defendant(s)**

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: Plaintiff(s)

See attached description

- (2) To satisfy the costs against Defendant(s) you are directed to levy upon the above listed property of Defendant(s) and sell his/their interests therein.



William A. Shaw, Prothonotary

**RECEIVED**  
Received writ this 24th day of  
A.D. 2001  
at 10:00 a.m. a.m./p.m.  
Sheriff by Leslie J. Carson  
Leslie J. Carson  
Sheriff by Margaret N. Pott

REQUESTING PARTY NAME: Ameriquest Mortgage Company  
ATTORNEY FILING: Leslie J. Carson, Jr., Esquire

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

**Sheriff Docket # 10965**

**AMERIQUEST MORTGAGE COMPANY**

**01-0306-CD**

**VS.**

**BIGGIE, MARK A.**

**WRIT OF POSSESSION**

**SHERIFF RETURNS**

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**NOW, MAY 21, 2001, DEPUTY FOUND THAT DEFENDANTS LEFT RESIDENCE,  
NO FORWARDING ADDRESS, DOG LAW OFFICER HAD TO BREAK IN LAST  
WEEK TO RESCUE THE DOGS THEY ABANDONED WHEN THEY MOVED.**

**NOW, MAY 23, 2001, AT 11:41 AM O'CLOCK SERVED WRIT OF POSSESSION ON  
ELEANOR M. BIGGIE, DEFENDANT, AT HER PLACE OF RESIDENCE, GATEWAY  
GARDENS, APT #24, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, 15801, BY  
HANDING TO ELEANOR M. BIGGIE, DEFENDANT, A TRUE AND ATTESTED COPY  
OF THE ORIGINAL WRIT OF POSSESSION AND MADE KNOWN TO HER THE CONTENTS  
THEREOF.**

**NOW, JUNE 4, 2001, RETURN WRIT AS ELEANOR M. BIGGIE BEING SERVED, MARK  
A. BIGGIE COULD NOT BE LOCATED, AND RESIDENCE IS EMPTY, PAID COSTS  
FROM ADVANCE AND MADE REFUND OF UNUSED ADVANCE TO THE ATTORNEY.**

**SHERIFF HAWKINS \$61.76**

**SURCHARGE 60.00**

**PAID BY ATTORNEY**

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In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10965

AMERIQUEST MORTGAGE COMPANY

01-0306-CD

VS.

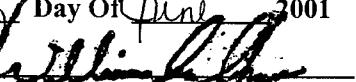
BIGGIE, MARK A.

WRIT OF POSSESSION

**SHERIFF RETURNS**

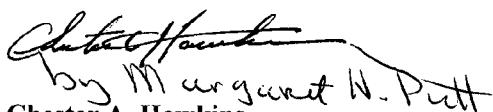
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Sworn to Before Me This

5th Day Of June 2001  


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

So Answers,

  
by Margaret N. Pitt  
Chester A. Hawkins  
Sheriff

**FILED**

JUN 05 2001  
019:49 am  
William A. Shaw EBS  
Prothonotary