

01-330-LJU
CITIFINANCIAL SERVICES, INC. -vs- PEGGY LEE OWENS et al

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

CITIFINANCIAL SERVICES, INC f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

CIVIL DIVISION

No. 01-330-CO

Plaintiff,

**COMPLAINT IN MORTGAGE
FORECLOSURE**

vs.

PEGGY LEE OWENS and
BOBBI JO WELCH,

MORTGAGE FORECLOSURE

Defendants.

Filed on behalf of:

Plaintiff

Counsel of record for this party:

RONALD J. DIGIORNO, ESQUIRE
Supreme Court #39025

RONALD J. DIGIORNO, ESQUIRE
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

(724) 378-9951

LOCATION OF PROPERTY:

115 Kate Street
Osceola Mills, PA 16666
(Borough of Osceola Mills)

FILED

MAR 07 2001

William A. Shaw
Prothonotary

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

CITIFINANCIAL SERVICES, INC. f/k/a :
COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : No.
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :

COMPLAINT IN THE MORTGAGE FORECLOSURE

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 YOU 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.

**CLEARFIELD COUNTY COURT ADMINISTRATOR'S OFFICE
ONE NORTH 2ND STREET
CLEARFIELD, PA 16830**

**TELEPHONE: (814) 765-2641
EXT. 32 OR 88**

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

CITIFINANCIAL SERVICES, INC. f/k/a	:
COMMERCIAL CREDIT PLAN	:
CONSUMER DISCOUNT COMPANY,	:
	:
Plaintiff,	:
	:
vs.	No.
	:
PEGGY LEE OWENS and	:
BOBBI JO WELCH,	:
	:
Defendants.	:

COMPLAINT IN MORTGAGE FORECLOSURE

AND NOW, comes the Plaintiff by its attorney, **RONALD J. DIGIORNO, ESQUIRE**, and pursuant to the Pennsylvania Rules of Civil Procedure Numbers 1141 through 1150, for its Complaint in Mortgage Foreclosure, sets forth the following:

1. The Plaintiff, **CITIFINANCIAL SERVICES, INC. f/k/a Commercial Credit Plan Consumer Discount Company**, is a Pennsylvania corporation duly authorized to conduct business within the laws of the Commonwealth of Pennsylvania, having a principal place of business located at 7467 New Ridge Road, Suite 222, Hanover, MD 21076.
2. Defendants, **PEGGY LEE OWENS and BOBBI JO WELCH**, are adult individuals residing at 115 Kate Street, Osceola Mills, Clearfield County, Pennsylvania 16666.
3. On the 16th day of February, 1996, in consideration of loan of Twenty-Two Thousand, Five Hundred, Eighty-Three and 78/100 - (\$22,583.78) - Dollars made by Commercial Creidt Plan Consumer Discount Company k/n/a CitiFinancial Services, Inc., a Pennsylvania corporation, to Defendants, the said Defendants executed and delivered to

Commercial Credit Plan Consumer Discount Company k/n/a CitiFinancial Services, Inc., a Pennsylvania corporation, a "Note" secured by a Mortgage with the Defendants as mortgagors and Commercial Credit Plan Consumer Discount Company k/n/a CitiFinancial Services, Inc., as mortgagee, which mortgage was recorded on the 20th day of February, 1996 in the Office of the Recorder of Deeds of Clearfield County, in Mortgage Book Volume 1737, page 140. The said mortgage is incorporated hereby reference.

4. The premises secured by the mortgage are:

ALL that certain property situated in the Borough of Osceola Mills in the County of Clearfield and Commonwealth of Pennsylvania, being more fully described in a deed dated 10/25/91 and recorded 10/31/91, among the land records of the county and state set forth above, in Deed Volume 1426 and page 172

Tax Map or Parcel ID No.: 161-13-378-12

5. Said mortgage provides, inter alia:

17. **Acceleration; Remedies. Upon Borrower's breach of any covenant or agreement of Borrower in this Mortgage**, including the covenants to pay when due any sums secured by this Mortgage, Lender prior to acceleration shall give notice to the Borrower as provided by applicable law specifying, among other things: (1) the breach; (2) the action required to cure such breach; (3) a date, not less than 30 days from the date the notice is mailed to Borrower, by which such breach must be cured; and (4) that failure to cure such breach on or before the date specified in the notice may result in acceleration of the sums secured by this Mortgage, foreclosure by judicial proceeding, and sale of the Property. The notice shall further inform Borrower of the right to reinstate after acceleration and the right to assert in the foreclosure proceeding the nonexistence of a default or any other defense of Borrower to acceleration and foreclosure. If the breach is not cured on or before the date specified in the notice, Lender, at Lender's option, may declare all of the sums secured by this Mortgage to be immediately due and payable without further demand and may foreclose this Mortgage by judicial proceeding. Lender shall be entitled to collect in such proceeding all expenses of foreclosure, including, but not limited to, reasonable attorneys' fees, and costs of documentary evidence, abstracts and title reports.

6. Since October, 2000, the mortgage has been in default by reason, inter alia, of the failure of the mortgagors to make payments provided for in the said mortgage (including

principal and interest) and, under the terms of the mortgage, the entire principal sum is due and payable.

7. In accordance with the appropriate Pennsylvania Act of Assembly and the Pennsylvania Rules of Civil Procedure, the mortgagor has been advised in writing of the mortgagee's intention to foreclose. The appropriate time period has elapsed since the Notice of Intention to Foreclose has been served upon the mortgagors.

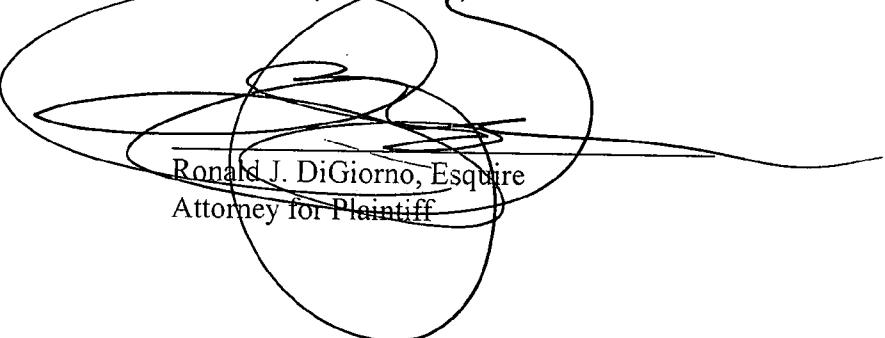
8. The amount due on the said mortgage is itemized on the attached schedule.

9. Plaintiff does hereby release the personal representative, heir and/or devisee of the mortgagor from liability for the debt secured by the mortgage.

WHEREFORE, pursuant to Pennsylvania Rules of Civil Procedure Number 1147(6), Plaintiff demands judgment for the amount due of Twenty Thousand, Six Hundred Sixty-Seven and 63/100 - (\$20,667.63) - Dollars with interest and costs.

Respectfully submitted,

Ronald J. DiGiorno, Esquire
Attorney for Plaintiff



PEGGY LEE OWENS and
BOBBI JO WELCH

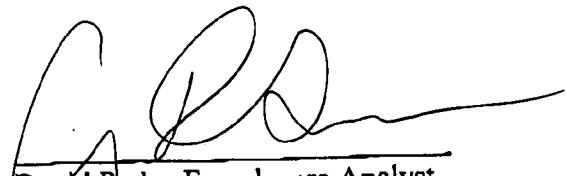
SCHEDULE OF AMOUNTS DUE UNDER MORTGAGE

Unpaid Principal Balance as of 2/26/01	\$18,899.54
Interest through 2/26/01	\$ 783.92
Attorney's fee - 5%	<u>\$ 984.17</u>
BALANCE DUE	\$20,667.63

AFFIDAVIT

STATE OF MARYLAND :
COUNTY OF ANNE ARUNDEL : SS:

Before me, the undersigned authority, a Notary Public in and for the State and County aforesaid, personally appeared, DAVID PARKS, Foreclosure Analyst of CitiFinancial Services, Inc. who being by me first duly sworn according to law, deposes and says that the averments contained in the foregoing Complaint are true and correct to the best of his knowledge, information and belief.



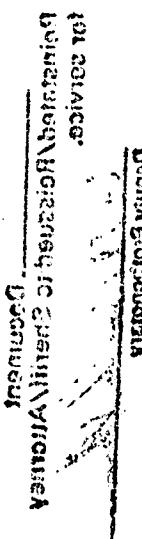
David Parks, Foreclosure Analyst
CitiFinancial Services, Inc..

Sworn to and subscribed before me,

this 31 day of August, 2000.

Jeffrey A. Nehman
NOTARY PUBLIC - My Commission Expires: 9/1/02

Jeffrey A. Nehman



5-11-01 Document
Reinstated/Resigned/Attorney
for service.

Deputy Prothonotary

FILED

*REC'D
MAR 13 2001
M 10:46 AM*
William A. Shaw
Prothonotary
2nd Sheriff

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

CITIFINANCIAL SERVICES, INC. f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

Plaintiff,

vs.

PEGGY LEE OWENS and
BOBBI JO WELCH,

Defendants,

CIVIL DIVISION:

No. 01-330 CD

TYPE OF PLEADING:

Motion for Alternative
Service of Process
Pursuant to Rule 430 Pa.R.C.P.

TYPE OF CASE:

Mortgage Foreclosure

FILED ON BEHALF OF:

CitiFinancial Services, Inc. f/k/a
Commercial Credit Plan Consumer
Discount Company, Plaintiff

COUNSEL OF RECORD:

RONALD J. DIGIORNO, ESQUIRE

SUPREME COURT NO.:

39025

RONALD J. DIGIORNO, ESQUIRE
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

TELEPHONE: (724) 378-9951

FILED

MAY 02 2001

01/06/01

William A. Shaw

Prothonotary

2 CENT TO PARTY

W/ GROEN

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

CITIFINANCIAL SERVICES, INC. f/k/a	:
COMMERCIAL CREDIT PLAN	:
CONSUMER DISCOUNT COMPANY,	:
	:
Plaintiff,	:
	:
vs.	:
	:
PEGGY LEE OWENS and	:
BOBBI JO WELCH,	:
	:
Defendants.	:

**MOTION FOR ALTERNATIVE SERVICE OF PROCESS
PURSUANT TO RULE 430 Pa.R.C.P.**

AND NOW COMES, Plaintiff, **CITIFINANCIAL SERVICES, INC. f/k/a**
Commercial Credit Plan Consumer Discount Company, by and through it's attorney,
RONALD J. DIGIORNO, ESQUIRE, with this Motion and support thereof avers as follows:

1. Plaintiff-Movant is **CITIFINANCIAL SERVICES, INC. f/k/a Commercial Credit Plan Consumer Discount Company**, a duly authorized lending institution within the Commonwealth of Pennsylvania, with principal offices situate at 7467 New Ridge Road, Suite 222, Hanover, MD 21076.
2. Defendants-Respondents, **PEGGY LEE OWENS and BOBBI JO WELCH**, are adult individuals whose last known address is 115 Kate Street, Osceola Mills, PA 16666.
3. On or about March 7, 2001, Plaintiff-Movant instituted suit in Mortgage Foreclosure against Defendants-Respondents by filing a Complaint with the Prothonotary of Clearfield County at the above-referenced case and number.

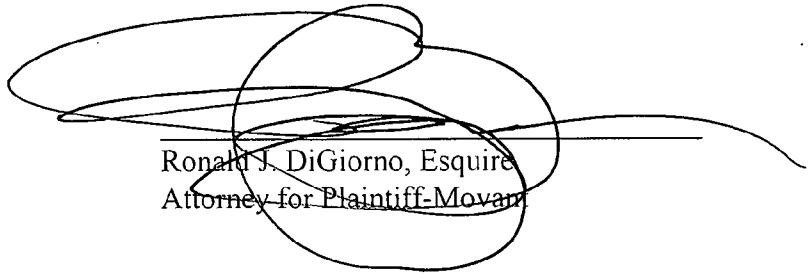
4. Plaintiff-Movant, through the Sheriff of Clearfield County attempted service on Defendants at their home address. Said attempts were unsuccessful.

5. Plaintiff-Movant avers and believes that the Defendants-Respondents, Peggy Lee Owens and Bobbi Jo Welch, have abandoned the premises situate at 115 Kate Street, Osceola Mills, PA 16666 and are intentionally concealing their whereabouts in order to evade service of process.

6. Pursuant to Pennsylvania Rules of Civil Procedure 430, Plaintiff has made a good faith effort to locate the Defendants. An Affidavit of reasonable investigation setting forth the specific inquires made and results therefrom is attached hereto as Plaintiff's Exhibit "A".

WHEREFORE, Plaintiff-Movant respectfully requests that this Honorable Court issue the following Order permitting Plaintiff-Movant to serve Defendants-Respondents with the Complaint in Mortgage Foreclosure by alternative service process pursuant to Rule 430 of the Pennsylvania Rules of Civil Procedure.

Respectfully submitted,



Ronald J. DiGiorno, Esquire
Attorney for Plaintiff-Movant

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

CITIFINANCIAL SERVICES, INC. f/k/a :
COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : No. 01-330 CD
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :

ORDER

AND NOW, to-wit, this 2nd day of May, 2001, upon consideration of Plaintiffs Motion and the Affidavit of Reasonable Investigation attached thereto, it is hereby ORDERED that Plaintiff may obtain service of the Complaint in Mortgage Foreclosure on the above-captioned Defendants, **Peggy Lee Owens and Bobbi Jo Welch**, by mailing a true and correct copy of the Complaint in Mortgage Foreclosure by Certified Mail and Regular Mail, by posting the premises at 115 Kate Street, Osceola Mills, PA 16666 by the Sheriff, and Notice by publication in Courier Express.

Service of the aforementioned mailing is effective upon the date of mailing and is to be done by Plaintiff's attorney, who will file with the Prothonotary's Office an Affidavit as to the mailing. FURTHER, that in the event that this case should be reduced to judgment and execution shall be issued, service upon the Defendants pursuant to Rule 3129.2(c) shall be effected by posting a copy of the Notice of Sale of Sheriff's handbill on the most public party of the premises and by publication by the Sheriff to Pennsylvania Rule of Civil Procedure 3129.(d).

BY THE COURT:

J.

AFFIDAVIT OF REASONABLE INVESTIGATION

Ronald J. DiGiorno, Esquire hereby certifies that he personally took the following action in connection with ascertaining the present whereabouts and/or the last known address of the following captioned defendant:

Defendant(s): **Peggy Lee Owens & Bobbi Jo Welch**
Inspected: **115 Kate Street, Osceola Mills, PA 16666**
Date:
Found: **NO ANSWER**

Made a request of the Postal Authorities and received a reply as follows:

Moved, left no address.

Inspected voting records and found:

No record of registration for either Defendant

Inspected telephone records and found:

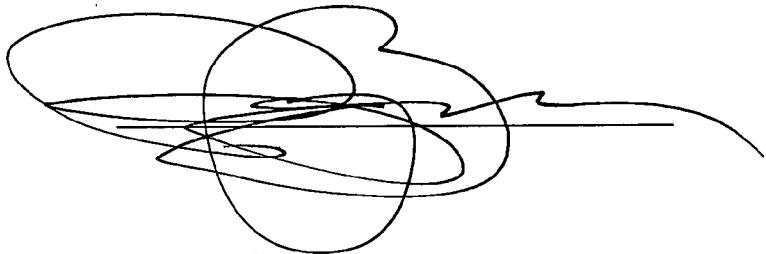
No listing

Other Action Taken:

Attempted service by Sheriff's Department.

This Affidavit is made subject to the penalties of 18 P.A.C.S., Section 4904 relating to unsworn falsification to authorities.

DATED 4/17/01



PLAINTIFF'S EXHIBIT "A"

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

**CITIFINANCIAL SERVICES, INC.
f/k/a COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,**

CIVIL ACTION:

No. 01-330 CD

Plaintiff,

vs.

**PEGGY LEE OWENS and
BOBBI JO WELCH,**

Defendants.

TYPE OF PLEADING:

Praecipe to Reinstate
Complaint

TYPE OF CASE:

Mortgage Foreclosure

FILED ON BEHALF OF:

Plaintiffs

COUNSEL OF RECORD:

RONALD J. DIGIORNO, ESQUIRE

SUPREME COURT NO.:

39025

**RONALD J. DIGIORNO, ESQUIRE
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001**

TELEPHONE: (724) 378-9951

FILED

MAY 11 2001

**William A. Shaw
Prothonotary**

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

CITIFINANCIAL SERVICES, INC.
f/k/a COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

Plaintiff,

vs.

No. 01-330 CD

PEGGY LEE OWENS and
BOBBI JO WELCH,

Defendants.

REINSTATEMENT
TO
CITIFINANCIAL SERVICES, INC.
f/k/a COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,
Plaintiff,
vs.
PEGGY LEE OWENS and
BOBBI JO WELCH,
Defendants.

PRAECIPE TO REINSTATE COMPLAINT

TO: PROTHONOTARY OF CLEARFIELD COUNTY:

Kindly reinstate the Complaint at the above-referenced case and number.

Ronald J. DiGiorno, Esquire
Attorney for Plaintiff

FILED

MAY 11 2001
M 10:27 AM 2001 DR. D. L. Dione
William A. Shaw
Prothonotary
Pd \$7.00

5-11-01 Document
Reinstated/Reinstated to Sheriff/Answer
for service.

J. M. K.
Deputy Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10770

CITIFINANCIAL SERVICES INC. f/k/a COMMERCIAL CREDIT PLAN CONSU 01-330-CD

VS.

OWENS, PEGGY LEE and BOBBI JO WELCH

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

**NOW APRIL 16, 2001 RETURN THE WITHIN COMPLAINT IN MORTGAGE
FORECLOSURE "NOT SERVED, TIME EXPIRED" AS TO BOBBI JO WELCH
AND PEGGY LEE OWENS, DEFENDANTS. SEVERAL ATTEMPTS, NEVER HOME.**

Return Costs

Cost	Description
102.54	SHFF. HAWKINS PAID BY: Atty
20.00	SURCHARGE: PAID BY: ATTY.

FILED

MAY 18 2001
01a:30 pm
William A. Shaw
Prothonotary

Sworn to Before Me This

18th Day of May 2001

So Answers,

Chester A. Hawkins
by Marilyn Harris

Chester A. Hawkins

Sheriff

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

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

CITIFINANCIAL SERVICES, INC f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

CIVIL DIVISION

No. 01-330-CO

Plaintiff,

COMPLAINT IN MORTGAGE
FORECLOSURE

vs.

PEGGY LEE OWENS and
BOBBI JO WELCH,

MORTGAGE FORECLOSURE

Defendants.

Filed on behalf of:

Plaintiff

Counsel of record for this party:

RONALD J. DIGIORNO, ESQUIRE
Supreme Court #39025

RONALD J. DIGIORNO, ESQUIRE
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

(724) 378-9951

LOCATION OF PROPERTY:

115 Kate Street
Osceola Mills, PA 16666
(Borough of Osceola Mills)

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

MAR 07 2001

Attest.

William J. Brown
Prothonotary

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

CITIFINANCIAL SERVICES, INC. f/k/a	:	
COMMERCIAL CREDIT PLAN	:	
CONSUMER DISCOUNT COMPANY,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	No.
	:	
PEGGY LEE OWENS and	:	
BOBBI JO WELCH,	:	
	:	
Defendants.	:	

COMPLAINT IN THE MORTGAGE FORECLOSURE

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.

CLEARFIELD COUNTY COURT ADMINISTRATOR'S OFFICE

ONE NORTH 2ND STREET
CLEARFIELD, PA 16830

TELEPHONE: (814) 765-2641
EXT. 32 OR 88

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

CITIFINANCIAL SERVICES, INC. f/k/a	:	
COMMERCIAL CREDIT PLAN	:	
CONSUMER DISCOUNT COMPANY,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	No.
	:	
PEGGY LEE OWENS and	:	
BOBBI JO WELCH,	:	
	:	
Defendants.	:	

COMPLAINT IN MORTGAGE FORECLOSURE

AND NOW, comes the Plaintiff by its attorney, **RONALD J. DIGIORNO, ESQUIRE**, and pursuant to the Pennsylvania Rules of Civil Procedure Numbers 1141 through 1150, for its Complaint in Mortgage Foreclosure, sets forth the following:

1. The Plaintiff, **CITIFINANCIAL SERVICES, INC. f/k/a Commercial Credit Plan Consumer Discount Company**, is a Pennsylvania corporation duly authorized to conduct business within the laws of the Commonwealth of Pennsylvania, having a principal place of business located at 7467 New Ridge Road, Suite 222, Hanover, MD 21076.
2. Defendants, **PEGGY LEE OWENS and BOBBI JO WELCH**, are adult individuals residing at 115 Kate Street, Osceola Mills, Clearfield County, Pennsylvania 16666.
3. On the 16th day of February, 1996, in consideration of loan of Twenty-Two Thousand, Five Hundred, Eighty-Three and 78/100 - (\$22,583.78) - Dollars made by Commercial Credit Plan Consumer Discount Company.k/n/a CitiFinancial Services, Inc., a Pennsylvania corporation, to Defendants, the said Defendants executed and delivered to

Commercial Credit Plan Consumer Discount Company k/n/a CitiFinancial Services, Inc., a Pennsylvania corporation, a "Note" secured by a Mortgage with the Defendants as mortgagors and Commercial Credit Plan Consumer Discount Company k/n/a CitiFinancial Services, Inc., as mortgagee, which mortgage was recorded on the 20th day of February, 1996 in the Office of the Recorder of Deeds of Clearfield County, in Mortgage Book Volume 1737, page 140. The said mortgage is incorporated hereby reference.

4. The premises secured by the mortgage are:

ALL that certain property situated in the Borough of Osceola Mills in the County of Clearfield and Commonwealth of Pennsylvania, being more fully described in a deed dated 10/25/91 and recorded 10/31/91, among the land records of the county and state set forth above, in Deed Volume 1426 and page 172

Tax Map or Parcel ID No.: 161-13-378-12

5. Said mortgage provides, inter alia:

17. **Acceleration; Remedies. Upon Borrower's breach of any covenant or agreement of Borrower in this Mortgage**, including the covenants to pay when due any sums secured by this Mortgage, Lender prior to acceleration shall give noticed to the Borrower as provided by applicable law specifying, among other things: (1) the breach; (2) the action required to cure such breach; (3) a date, not less than 30 days from the date the notice is mailed to Borrower, by which such breach must be cured; and (4) that failure to cure such breach on or before the date specified in the notice may result in acceleration of the sums secured by this Mortgage, foreclosure by judicial proceeding, and sale of the Property. The notice shall further inform Borrower of the right to reinstate after acceleration and the right to assert in the foreclosure proceeding the nonexistence of a default or any other defense of Borrower to acceleration and foreclosure. If the breach is not cured on or before the date specified in the notice, Lender, at Lender's option, may declare all of the sums secured by this Mortgage to be immediately due and payable without further demand and may foreclose this Mortgage by judicial proceeding. Lender shall be entitled to collect in such proceeding all expenses of foreclosure, including, but not limited to, reasonable attorneys' fees, and costs of documentary evidence, abstracts and title reports.

6. Since October, 2000, the mortgage has been in default by reason, inter alia, of the failure of the mortgagors to make payments provided for in the said mortgage (including

PEGGY LEE OWENS and
BOBBI JO WELCH

SCHEDULE OF AMOUNTS DUE UNDER MORTGAGE

Unpaid Principal Balance as of 2/26/01	\$18,899.54
Interest through 2/26/01	\$ 783.92
Attorney's fee - 5%	<u>\$ 984.17</u>
BALANCE DUE	\$20,667.63

AFFIDAVIT

STATE OF MARYLAND :
COUNTY OF ANNE ARUNDEL : SS:

Before me, the undersigned authority, a Notary Public in and for the State and County aforesaid, personally appeared, DAVID PARKS, Foreclosure Analyst of CitiFinancial Services, Inc. who being by me first duly sworn according to law, deposes and says that the averments contained in the foregoing Complaint are true and correct to the best of his knowledge, information and belief.



David Parks, Foreclosure Analyst
CitiFinancial Services, Inc.

Sworn to and subscribed before me,

this 31 day of August, 2000.



NOTARY PUBLIC - My Commission Expires: 9/1/02
Jeffrey A. Nehman

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

CITIFINANCIAL SERVICES, INC f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

CIVIL DIVISION

No. 01-330-CD

Plaintiff,

**COMPLAINT IN MORTGAGE
FORECLOSURE**

vs.

PEGGY LEE OWENS and
BOBBI JO WELCH,

MORTGAGE FORECLOSURE

Defendants.

Filed on behalf of:

Plaintiff

Counsel of record for this party:

RONALD J. DIGIORNO, ESQUIRE
Supreme Court #39025

RONALD J. DIGIORNO, ESQUIRE
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

(724) 378-9951

LOCATION OF PROPERTY:

115 Kate Street
Osceola Mills, PA 16666
(Borough of Osceola Mills)

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

MAR 07 2001

Attest.

William C. Bear
Prothonotary

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

CITIFINANCIAL SERVICES, INC. f/k/a	:	
COMMERCIAL CREDIT PLAN	:	
CONSUMER DISCOUNT COMPANY,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	No.
	:	
PEGGY LEE OWENS and	:	
BOBBI JO WELCH,	:	
	:	
Defendants.	:	

COMPLAINT IN THE MORTGAGE FORECLOSURE

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 YOU 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.

CLEARFIELD COUNTY COURT ADMINISTRATOR'S OFFICE

**ONE NORTH 2ND STREET
CLEARFIELD, PA 16830**

**TELEPHONE: (814) 765-2641
EXT. 32 OR 88**

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

CITIFINANCIAL SERVICES, INC. f/k/a	:
COMMERCIAL CREDIT PLAN	:
CONSUMER DISCOUNT COMPANY,	:
	:
Plaintiff,	:
	:
vs.	:
	:
PEGGY LEE OWENS and	:
BOBBI JO WELCH,	:
	:
Defendants.	:

COMPLAINT IN MORTGAGE FORECLOSURE

AND NOW, comes the Plaintiff by its attorney, **RONALD J. DIGIORNO, ESQUIRE**, and pursuant to the Pennsylvania Rules of Civil Procedure Numbers 1141 through 1150, for its Complaint in Mortgage Foreclosure, sets forth the following:

1. The Plaintiff, **CITIFINANCIAL SERVICES, INC. f/k/a Commercial Credit Plan Consumer Discount Company**, is a Pennsylvania corporation duly authorized to conduct business within the laws of the Commonwealth of Pennsylvania, having a principal place of business located at 7467 New Ridge Road, Suite 222, Hanover, MD 21076.

2. Defendants, **PEGGY LEE OWENS and BOBBI JO WELCH**, are adult individuals residing at 115 Kate Street, Osceola Mills, Clearfield County, Pennsylvania 16666.

3. On the 16th day of February, 1996, in consideration of loan of Twenty-Two Thousand, Five Hundred, Eighty-Three and 78/100 - (\$22,583.78) - Dollars made by Commercial Credit Plan Consumer Discount Company k/n/a CitiFinancial Services, Inc., a Pennsylvania corporation, to Defendants, the said Defendants executed and delivered to

Commercial Credit Plan Consumer Discount Company k/n/a CitiFinancial Services, Inc., a Pennsylvania corporation, a "Note" secured by a Mortgage with the Defendants as mortgagors and Commercial Credit Plan Consumer Discount Company k/n/a CitiFinancial Services, Inc., as mortgagee, which mortgage was recorded on the 20th day of February, 1996 in the Office of the Recorder of Deeds of Clearfield County, in Mortgage Book Volume 1737, page 140. The said mortgage is incorporated hereby reference.

4. The premises secured by the mortgage are:

ALL that certain property situated in the Borough of Osceola Mills in the County of Clearfield and Commonwealth of Pennsylvania, being more fully described in a deed dated 10/25/91 and recorded 10/31/91, among the land records of the county and state set forth above, in Deed Volume 1426 and page 172

Tax Map or Parcel ID No.: 161-13-378-12

5. Said mortgage provides, inter alia:

17. **Acceleration; Remedies. Upon Borrower's breach of any covenant or agreement of Borrower in this Mortgage**, including the covenants to pay when due any sums secured by this Mortgage, Lender prior to acceleration shall give notice to the Borrower as provided by applicable law specifying, among other things: (1) the breach; (2) the action required to cure such breach; (3) a date, not less than 30 days from the date the notice is mailed to Borrower, by which such breach must be cured; and (4) that failure to cure such breach on or before the date specified in the notice may result in acceleration of the sums secured by this Mortgage, foreclosure by judicial proceeding, and sale of the Property. The notice shall further inform Borrower of the right to reinstate after acceleration and the right to assert in the foreclosure proceeding the nonexistence of a default or any other defense of Borrower to acceleration and foreclosure. If the breach is not cured on or before the date specified in the notice, Lender, at Lender's option, may declare all of the sums secured by this Mortgage to be immediately due and payable without further demand and may foreclose this Mortgage by judicial proceeding. Lender shall be entitled to collect in such proceeding all expenses of foreclosure, including, but not limited to, reasonable attorneys' fees, and costs of documentary evidence, abstracts and title reports.

6. Since October, 2000, the mortgage has been in default by reason, inter alia, of the failure of the mortgagors to make payments provided for in the said mortgage (including

AFFIDAVITSTATE OF MARYLAND

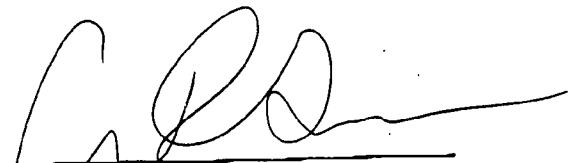
:

SS:

COUNTY OF ANNE ARUNDEL

:

Before me, the undersigned authority, a Notary Public in and for the State and County aforesaid, personally appeared, DAVID PARKS, Foreclosure Analyst of CitiFinancial Services, Inc. who being by me first duly sworn according to law, deposes and says that the averments contained in the foregoing Complaint are true and correct to the best of his knowledge, information and belief.



David Parks, Foreclosure Analyst
CitiFinancial Services, Inc.

Sworn to and subscribed before me,

this 31 day of August, 2000.



NOTARY PUBLIC - My Commission Expires: 9/1/02

Jeffrey A. Nehman

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
P E N N S Y L V A N I A
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC.
f/k/a COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

CIVIL DIVISION:

No. 01-330 CD

Plaintiff,

vs.

PEGGY LEE OWENS and
BOBBI JO WELCH,

Defendants.

TYPE OF PLEADING:

Affidavit of Service

TYPE OF CASE:

Mortgage Foreclosure

FILED ON BEHALF OF:

CitiFinancial Services Inc.,
Plaintiff

COUNSEL OF RECORD:

RONALD J. DIGIORNO, ESQUIRE

SUPREME COURT NO.:

39025

RONALD J. DIGIORNO, ESQUIRE
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

TELEPHONE: (724) 378-9951

FILED

MAY 21 2001

William A. Shaw
Prothonotary

2000 1670 0002 2125 7299

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OSCEOLA MILLS PA 16666	
Postage	\$ 0.55
Certified Fee	\$1.90
Return Receipt Fee (Endorsement Required)	\$1.50
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 3.95
0186 02 Postmark Here 05/15/2001	
Sent To Peggy Lee Owens Street, Apt. No.; or PO Box No. 115 Kate Street City, State, ZIP+4 Osceola Mills, PA 16666 PS Form 3800, May 2000	
See Reverse for Instructions	

U.S. Postal Service CERTIFIED MAIL RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
OSCEOLA MILLS PA 16666	
Postage	\$ 0.55
Certified Fee	\$1.90
Return Receipt Fee (Endorsement Required)	\$1.50
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 3.95
0186 02 Postmark Here 05/15/2001	
Sent To Bobbi Jo Welch Street, Apt. No.; or PO Box No. 115 Kate Street City, State, ZIP+4 Osceola Mills, PA 16666 PS Form 3800, May 2000	
See Reverse for Instructions	

U.S. POSTAL SERVICE CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT
PROVIDE FOR INSURANCE—POSTMASTER

Received From:
Ronald J. DiGiorno, Esquire
150 Pleasant drive, Suite 103
Aliquippa, PA 15001

One piece of ordinary mail addressed to:
Peggy Lee Owens
115 Kate Street
Osceola Mills, PA 16666

U.S. POSTAGE PAID
BEAVER, PA
15009
MAY 15 2001
AMOUNT \$0.75

PS Form 3817, Mar. 1989

U.S. POSTAL SERVICE CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT
PROVIDE FOR INSURANCE—POSTMASTER

Received From:
Ronald J. DiGiorno, Esquire
150 Pleasant Drive, Suite 103
Aliquippa, PA 15001

One piece of ordinary mail addressed to:
Bobbi Jo Welch
115 Kate Street
Osceola Mills, PA 16666

U.S. POSTAGE PAID
BEAVER, PA
15009
MAY 15 2001
AMOUNT \$0.75

PS Form 3817, Mar. 1989

EXHIBIT "A"

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10770

CITIFINANCIAL SERVICES INC. f/k/a COMMERCIAL CREDIT PLAN CONSU 01-330-CD

VS.

OWENS, PEGGY LEE and BOBBI JO WELCH

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW MAY 18, 2001 AT 9:48 AM DST POSTED THE WITHIN COMPLAINT IN
MORTGAGE FORECLOSURE ON THE PROPERTY OF PEGGY LEE OWENS AND
BOBBI JO WELCH, DEFENDANTS AT 115 KATE ST., OSCEOLA MILLS, CLEARFIELD
COUNTY, PENNSYLVANIA.

SERVED BY: DAVIS/MORGILLO

Return Costs

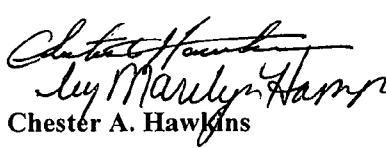
Cost	Description
19.40	SHFF. HAWKINS PAID BY: ATTY.
10.00	SURCHARGE: PAID BY: ATTY.

Sworn to Before Me This

22 Day Of May 2001


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

So Answers,


Chester A. Hawkins
Sheriff

FILED

MAY 22 2001

0/3:00pm

William A. Shaw
Prothonotary

W/C/


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

CITIFINANCIAL SERVICES, INC. f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

CIVIL DIVISION:

No. 01-330 CD

Plaintiff,

vs.

PEGGY LEE OWENS and
BOBBI JO WELCH,

Defendants.

TYPE OF PLEADING:

Affidavit of Service Pursuant
to Notice by Publication

TYPE OF CASE:

Mortgage Foreclosure

FILED ON BEHALF OF:

Plaintiff

COUNSEL OF RECORD:

RONALD J. DIGIORNO, ESQ.

SUPREME COURT NO.:

39025

RONALD J. DIGIORNO, ESQ
Attorney at Law
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

TELEPHONE: (724) 378-9951

FILED

JUN 14 2001

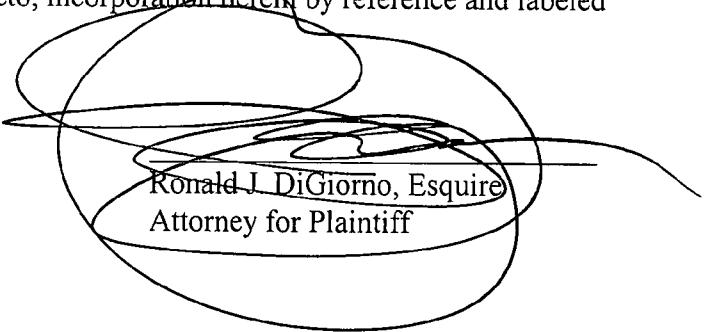
William A. Shaw
Prothonotary

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

CITIFINANCIAL SERVICES, INC. :
f/k/a COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
: Plaintiff :
: vs. : No. 01-330 CD
: :
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
: Defendant :
:

AFFIDAVIT OF SERVICE PURSUANT TO NOTICE BY PUBLICATION

I, RONALD J. DIGIORNO, ESQUIRE, the undersigned do hereby swear and affirm that complete advertisement of Notice of the Complaint in Mortgage Foreclosure was published in the COURIER EXPRESS at the above-captioned case and number pursuant to the Court Order dated May 2, 2001. The proofs of publication from the COURIER EXPRESS evidencing advertisement on May 10, 2001, is attached hereto, incorporation herein by reference and labeled as Exhibit "A".

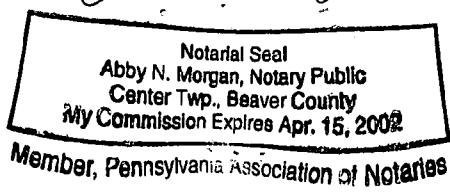


Ronald J. DiGiorno, Esquire
Attorney for Plaintiff

Sworn to and subscribed before me,

this 11th day of June, 2001.

Abby N. Morgan
NOTARY PUBLIC - My Commission Expires:



PROOF OF PUBLICATION OF NOTICE APPEARING IN THE

~~COURIER EXPRESS~~ **COURIER EXPRESS/ TRI-COUNTY SUNDAY**
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA
CIVIL DIVISION-LAW
CITIFINANCIAL SERVICES, INC. f/k/a
COMMERCIAL CREDIT PLAN CONSUMER
DISCOUNT COMPANY

**MAN PUBLISHING COMPANY,
PENNSYLVANIA**
roved May 16, 1929, P.L. 1784

ST/CO
Plaintiff

Lin
Sta
the
Stri
whi
Col
wa:

vs.
PEGGY LEE OWENS and
BOBBI JO WELCH

Defendant

No.01-330 CD

MORTGAGE FORECLOSURE

NOTICE TO: PEGGY LEE OWENS and BOBBI JO WELCH:

You have been named as Defendants in a mortgage foreclosure action instituted by the above Plaintiff. Plaintiff alleges in its Complaint that you executed and delivered to Plaintiff a written Mortgage and Promissory Note dated February 16, 1996 and that you are in default and have not made the payments required by the mortgage and loan documents. Plaintiff seeks judgment in mortgage foreclosure against you for the total sum of \$20,667.63 which includes the unpaid mortgage balance, interest through February 26, 2001 and five (5%) percent attorney fees plus additional interest at the rate set forth in the loan documents and all fees, costs and expense incurred or amounts advanced by the Plaintiff pursuant to the loan documents and for foreclosure and sale of the mortgage property known as 115 Kate Street, Osceola Mills, Pennsylvania 1666.

SI
You are notified to plead to the Complaint in this case, of which the above is a brief summary, within twenty (20) days from the date of publication of this notice. A complete copy of the Complaint is available by contacting the attorney for the Plaintiff or at the Office of the Prothonotary, Clearfield County Courthouse, 1 North 2nd Street, Clearfield, Pennsylvania 16830.

If you wish to defend, you must enter a written appearance personally or by attorney and file your defenses or objections in writing with the Court. You are warned that if you fail to do so, the case may proceed without you and a judgment may enter against you without further notice for the relief requested by the Plaintiff. You may lose money or property or other rights important to you.

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 OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

CLEARFIELD COUNTY COURT ADMINISTRATOR'S OFFICE
ONE NORTH SECOND STREET
CLEARFIELD, PA 15830
TELEPHONE: (814) 765-2641
EXT. 32 or 88

Ronald J. DiGiorno, Esquire
150 Pleasant Drive, Suite 103
Aliquippa, PA 15001
(724) 378-9951

5/10/01

ier-Express/Tri-County Sunday, of the County and
says that the Courier-Express, a daily newspaper and
published by McLean Publishing Company at 500 Jeffers
esaid, which was established in the year 1879, since
weekly publication, has been regularly issued in said
of publication is attached hereto exactly as the same
ons of the paper on the following dates, viz: the

day of May 2001 A.D.
duly authorized by the Courier-Express, a daily
ekly newspaper, to verify the foregoing statement under
ested in the subject matter of the aforesaid notice of
e going statement as to time, place and character of

**HING COMPANY Publisher of
ESS/ TRI-COUNTY SUNDAY**

Linda Smith
8/2 day of June, 2001
C. Greco
Notary Public
ent of Advertising Cost
PUBLISHING COMPANY
Publisher of
RESS/ TRI-COUNTY SUNDAY
DuBois, PA

Notary Seal
Joseph A. Greco, Notary Public
DuBois, Clearfield County
My Commission Expires July 18, 2002
Member, Pennsylvania Association of Notaries

Mortgage Foreclosure/Owens
the notice or advertisement
above stated dates.....\$ 172.80
.....\$ 4.25
.....\$ 177.05

Receipt for Advertising Costs

per, and/or **Tri-County Sunday**, a weekly newspaper,
oresaid advertising and publication costs, and certifies
same have been fully paid.
and Beaver Drive, DuBois, PA 15801
1879, Phone 814-371-4200

McLEAN PUBLISHING COMPANY
Publisher of
COURIER-EXPRESS/ TRI-COUNTY SUNDAY

By _____

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
P E N N S Y L V A N I A
CIVIL DIVISION - LAW

**CITIFINANCIAL SERVICES, INC. f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,**

Plaintiff,

vs.

**PEGGY LEE OWENS and
BOBBI JO WELCH,**

Defendants.

CIVIL DIVISION:

No. 01-330 CD

TYPE OF PLEADING:

Praeclipe for Entry of
Default Judgment

TYPE OF CASE:

Civil

FILED OF BEHALF OF:

CitiFinancial Services, Inc. f/k/a
Commercial Credit Plan Consumer
Discount Company, Plaintiff

COUNSEL OF RECORD:

**RONALD J. DIGIORNO,
ESQUIRE**

SUPREME COURT NO. :

39025

**RONALD J. DIGIORNO, ESQ.
Attorney at Law
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001**

Telephone: (724) 378-9951

FILED

JUN 27 2001

**William A. Shaw
Prothonotary**

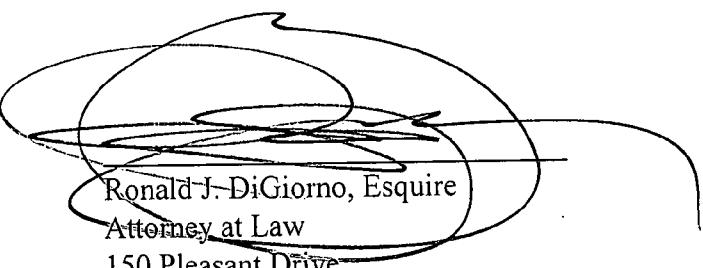
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC. f/k/a :
COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
: Plaintiff, :
: :
vs. : : No. 01-330 CD
: :
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
: :
:

PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT

TO: Prothonotary, Clearfield County.

Kindly enter a default judgment for Plaintiff, **CITIFINANCIAL SERVICES, INC.**
f/k/a COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY, and against
Defendants, **PEGGY LEE OWENS and BOBBI JO WELCH**, in the amount Twenty
Thousand, Six Hundred, Sixty-Seven and 63/100 - (\$20,667.63) - Dollars plus attorneys fees,
interest and costs pursuant to Rule 1037 of the Pennsylvania Rules of Conduct of Civil
Procedure.



Ronald J. DiGiorno, Esquire
Attorney at Law
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

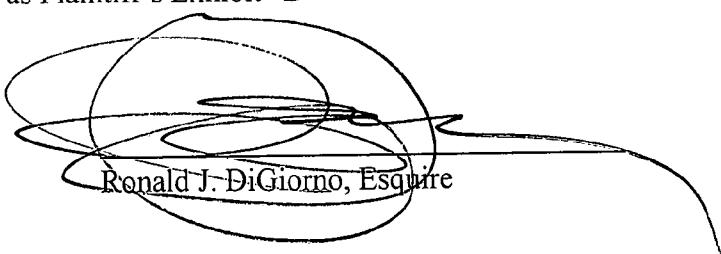
Telephone: (724) 378-9951

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

CITIFINANCIAL SERVICES, INC. f/k/a	:
COMMERCIAL CREDIT PLAN	:
CONSUMER DISCOUNT COMPANY,	:
	:
Plaintiff,	:
	:
vs.	:
	:
PEGGY LEE OWENS and	:
BOBBI JO WELCH,	:
	:
Defendants.	:

**CERTIFICATION OF NOTICE OF PRAECIPE FOR ENTRY
OF DEFAULT JUDGMENT PURSUANT TO RULE 237.1 OF
THE PENNSYLVANIA RULES OF CIVIL PROCEDURE**

The undersigned hereby certifies that Defendants, **PEGGY LEE OWENS and BOBBI JO WELCH**, were given written notice of Plaintiff's intention to file the Praecipe for Entry of Default Judgment on June 15, 2001. A copy of said Notices are attached hereto, made a part hereof, incorporated herein by reference and labeled as Plaintiff's Exhibit "A". A copy of the Certificate of Mailings of the above mentioned Notice is also attached hereto, made a part hereof, incorporated herein by reference and labeled as Plaintiff's Exhibit "B"



Ronald J. DiGiorno, Esquire

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

CITIFINANCIAL SERVICES, INC. f/k/a	:
COMMERCIAL CREDIT PLAN	:
CONSUMER DISCOUNT COMPANY,	:
	:
Plaintiff,	:
	:
vs.	:
	No. 01-330 CD
	:
PEGGY LEE OWENS and	:
BOBBI JO WELCH,	:
	:
Defendant.	:

DATE: June 15, 2001

TO: Peggy Lee Ownes
115 Kate State
Osceola Mills, PA 16666

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS FOR 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 A LAWYER AT ONCE. IF YOU D 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 COURT ADMINISTRATOR'S OFFICE
ONE NORTH 2ND STREET
CLEARFIELD, PA 16830

TELEPHONE: (814) 765-2641
EXT. 32 OR 88

Ronald J. DiGiorno, Esquire
Attorney for Plaintiff

EXHIBIT "A"

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

CITIFINANCIAL SERVICES, INC. f/k/a	:	
COMMERCIAL CREDIT PLAN	:	
CONSUMER DISCOUNT COMPANY,	:	
	:	
Plaintiff,	:	
	:	
vs.	:	No. 01-330 CD
	:	
PEGGY LEE OWENS and	:	
BOBBI JO WELCH,	:	
	:	
Defendant.	:	

DATE: June 15, 2001

TO: Bobbi Jo Welch
115 Kate State
Osceola Mills, PA 16666

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS FOR 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 A LAWYER AT ONCE. IF YOU D 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 COURT ADMINISTRATOR'S OFFICE
ONE NORTH 2ND STREET
CLEARFIELD, PA 16830

TELEPHONE: (814) 765-2641
EXT. 32 OR 88

Ronald J. DiGiorno, Esquire
Attorney for Plaintiff

U.S. POSTAL SERVICE CERTIFICATE OF MAILING <small>MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMASTER</small>	
<p>Received From:</p> <p>Ronald J. DiGiorno, Esq. <u>150 Pleasant Dr. Suite 103</u> <u>Aliquippa, Pa 15001</u></p> <p>One piece of ordinary mail addressed to:</p> <p>Bobbi Jo Welch <u>115 Kate Street</u> <u>Osceola Mills, Pa 16066</u></p>	

PS Form 3817, Mar. 1989

Affix fee here in stamps
or meter postage and
post mark. Inquire of
Postmaster for current
fee.

PA 15001
POSTAGE PAID

U.S. POSTAL SERVICE CERTIFICATE OF MAILING <small>MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMASTER</small>	
<p>Received From:</p> <p>Ronald J. DiGiorno, Esq. <u>150 Pleasant Dr, Suite 103</u> <u>Aliquippa, Pa 15001</u></p> <p>One piece of ordinary mail addressed to:</p> <p>Peggy Lee Owens <u>115 Kate Street</u> <u>Osceola Mills, Pa 16066</u></p>	

PS Form 3817, Mar. 1989

Affix fee here in stamps
or meter postage and
post mark. Inquire of
Postmaster for current
fee.

PA 15001
POSTAGE PAID

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

CITIFINANCIAL SERVICES, INC. f/k/a :
COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
: Plaintiff, :
: :
vs. : : No. 01-330 CD
: :
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
: :

AFFIDAVIT OF LAST KNOWN ADDRESS

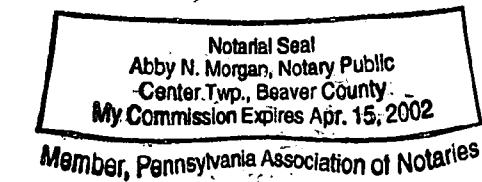
COMMONWEALTH OF PENNSYLVANIA :
: :
COUNTY OF BEAVER : :

Before me, the undersigned authority, in and for said County and state personally appeared **RONALD J. DIGIORNO, ESQUIRE**, who being duly sworn according to law, deposes and says that the principal office of Plaintiff, **CITIFINANCIAL SERVICES, INC. f/k/a COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY**, is situate at 7467 New Ridge Road, Suite 222, Hanover, MD 21076, and that the last known address of Defendants, **PEGGY LEE OWENS and BOBBI JO WELCH**, is 115 Kate Street, Osceola Mills, PA 16666.

Sworn to and subscribed before me,

this 24th day of June, 2001.

Abby N. Morgan
NOTARY PUBLIC - My Commission Expires:

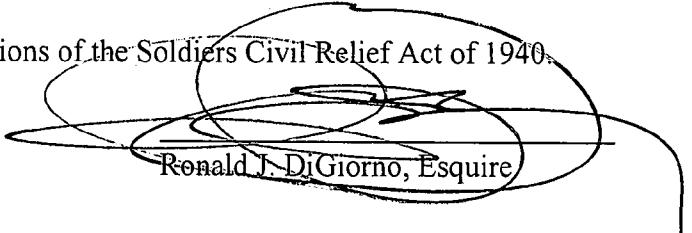


IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC. f/k/a :
COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : No. 01-330 CD
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
COMMONWEALTH OF PENNSYLVANIA : SS:
COUNTY OF BEAVER :
:

BEFORE me, the undersigned authority, personally appeared Ronald J. DiGiorno, Esquire, who, being duly sworn according to law, deposes and says that he is advised and believes that DEFENDANTS, PEGGY LEE OWENS and BOBBI JO WELCH, are not presently in the active military service of the United States of America and not a member of the Army of the United States, United States Navy, the Marine Corps, or the Coast Guard, and not an officer 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 in 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.

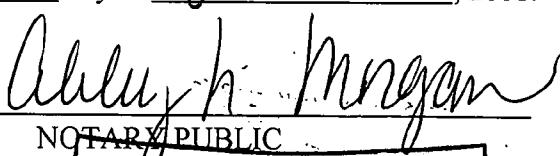
This Affidavit is made under the provisions of the Soldiers Civil Relief Act of 1940.



Ronald J. DiGiorno, Esquire

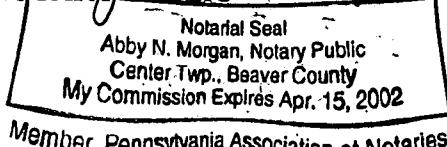
Sworn to and subscribed before me

this 24th day of June, 2001.



Abby N. Morgan

NOTARY PUBLIC



Member, Pennsylvania Association of Notaries

FILED

JUN 27 2001
12:41 P.M. atty. DiDionno
William A. Shaw
Prothonotary
Pd \$20.00

Not. to Ds: Welch
Owens

Statement to atty: *Ed*
test

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

CITIFINANCIAL SERVICES, INC. f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

COPY

Plaintiff,

vs.

No. 01-330 CD

PEGGY LEE OWENS and
BOBBI JO WELCH,

Defendants.

NOTICE OF ORDER, DECREE OR JUDGMENT

TO: Plaintiff Defendant(s) Garnishee Additional Defendant

June 27, 2001 You are hereby notified that the following Order, Decree, Of Judgment has been entered against you on _____

Decree Nishi in Equity.

Final Decree in Equity.

Judgment of Confession Verdict
 Default Non-Suit
 Non-Pros Arbitration Award

Judgment is in the amount of \$20,667.63 PLUS COSTS.

District Justice Transcript of Judgment in (Assumpsit/Tresspass)
in the amount of \$ _____, PLUS COSTS.

If not satisfied within sixty (60) days, your motor vehicle operator's license will be suspended by the
Pennsylvania Department of Transportation.

PROTHONOTARY

BY _____
Deputy

If you have any questions concerning the above, please contact:

Name of Attorney/Filing Party: Ronald J. DiGiorno

Address: 150 Pleasant Drive, Suite 103, Aliquippa, Pa 15001

Telephone Number: (724) 378-9951

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
STATEMENT OF JUDGMENT

COPY

Citifinancial Services, Inc.
Commercial Credit Plan Consumer Discount
Company
Plaintiff(s)

No.: 2001-00330-CD

Real Debt: \$20,667.63

Atty's Comm:

Vs. Costs: \$

Int. From:

Peggy Lee Owens
Bobbi Jo Welch
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: June 28, 2001

Expires: June 28, 2006

Certified from the record this 28th of June, 2001

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment, Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

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

CITIFINANCIAL SERVICES, INC. f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

CIVIL DIVISION:

No. 01-330 CD

Plaintiff,

vs.

PEGGY LEE OWENS and
BOBBI JO WELCH,

Defendants.

TYPE OF PLEADING:

Praecipe for Writ of
Execution

TYPE OF CASE:

Mortgage Foreclosure

FILED OF BEHALF OF:

CitiFinancial Services, Inc. f/k/a
Commercial Credit Plan Consumer
Discount Company, Plaintiff

COUNSEL OF RECORD:

RONALD J. DIGIORNO,
ESQUIRE

SUPREME COURT NO. :

39025

RONALD J. DIGIORNO, ESQ.
Attorney at Law
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

Telephone: (724) 378-9951

FILED
AUG 21 2001

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
P E N N S Y L V A N I A
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC. f/k/a	:
COMMERCIAL CREDIT PLAN	:
CONSUMER DISCOUNT COMPANY,	:
	:
Plaintiff,	:
	:
vs.	:
	No. 01-330 CD
	:
PEGGY LEE OWENS and	:
BOBBI JO WELCH,	:
	:
Defendants.	:

PRAECIPE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Kindly issue a Writ of Execution in the above matter:

Amount Due	\$20,667.63
Interest from 2/26/01 to	\$
Total	\$

The real estate which is the subject matter of the Praeclipe for Writ of Execution is situate at 115 Kate Street, Osceola Mills, PA 16666.

Ronald J. DiGiorno, Esquire
Attorney for Plaintiff

ED

AUG 21 2001
M19.40 | 00
William A. Shaw
Prothonotary

6 WRTS Shrd

Copy 7

WRIT OF EXECUTION and/or ATTACHMENT
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
CIVIL ACTION - LAW

Citifinancial Services, Inc., f/k/a
Commercial Credit Plan
Consumer Discount Company,

Vs.

NO.: 2001-00330-CD

Peggy Lee Owens , and
Bobbi Jo Welch ,

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the debt, interest and costs due CITIFINANCIAL SERVICES, INC., COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY, Plaintiff(s) from PEGGY LEE OWENS , BOBBI JO WELCH , Defendant(s):

(1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:
See Attached Description

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:

Garnishee(s) as follows:

and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;

(3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE: \$20,667.63

PAID: \$127.00

INTEREST: from 2/26/01 to

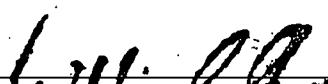
SHERIFF: \$

PROTH. COSTS: \$

OTHER COSTS: \$

ATTY'S COMM: \$

DATE: 08/21/2001



William A. Shanahan
Prothonotary/Clerk Civil Division

Received this writ this _____ day
of _____ A.D. _____
At _____ A.M./P.M.

Requesting Party: Ronald J. DiGiorno, Esquire
Suite 103
150 Pleasant Drive
Aliquippa, PA 15001

Sheriff

ALL THE RIGHT, TITLE, INTEREST AND CLAIM OF PEGGY LEE OWENS AND BOBBI JO WELCH, OF, IN AND TO FOLLOWING DESCRIBED REAL PROPERTY:

ALL THE FOLLOWING DESCRIBED REAL ESTATE SITUATE IN THE BOROUGH OF OSCEOLA, COUNTY OF CLEARFIELD, PENNSYLVANIA, HAVING ERECTED THEREON A DWELLING HOUSE KNOWN AS 115 KATE STREET, OSCEOLA MILLS, PENNSYLVANIA 16666, . PARCEL HG 16-013-378-12.

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

CITIFINANCIAL SERVICES, INC. f/k/a	:
COMMERCIAL CREDIT PLAN	:
CONSUMER DISCOUNT COMPANY,	:
	:
Plaintiff,	:
	:
vs.	:
	No. 01-330 CD
PEGGY LEE OWENS and	:
BOBBI JO WELCH,	:
	:
Defendants.	:

ALL that certain lot or piece of ground situate in the Borough of Osceola. County of Clearfield. and State of Pennsylvania, bounded and described as follows:

Beginning at a point on the South side of Kate Street seventy four (74) feet from corner of Kate Street and Morgan Street; thence along lot number 447 South 28 3/4° West one hundred fifty (150) feet to Montgomery Alley: thence along said Montgomery Alley North 61 1/4° West thirty eight (38) feet; thence along lot number 445 North 28 3/4° East one hundred fifty (150) feet to Kate Street: thence along the South side of Kate Street 61 1/4° East thirty eight (38) feet to the place of beginning. Containing about 57/75 of one lot as laid out in the general plan of said Borough and to be known as lot number 449 1/2.

HET a dwelling known as 115 Kate Street, Osceola Mills, PA 16666.

Parcel 16-013-378-12

RONALD J. DIGIORNO, ESQUIRE
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001
Telephone: (724) 378-9951

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

**CITIFINANCIAL SERVICES, INC.
f/k/a COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,**

CIVIL DIVISION:

No. 01-330 CD

Plaintiff,

vs.

**PEGGY LEE OWENS and
BOBBI JO WELCH,**

TYPE OF PLEADING:

**AFFIDAVIT OF SERVICE OF
NOTICE OF SALE**

Defendant.

TYPE OF CASE:

Mortgage Foreclosure

FILED ON BEHALF OF:

**CitiFinancial Services, Inc. f/k/a
Commercial Credit Plan
Consumer Discount Company ,
Plaintiff**

COUNSEL OF RECORD:

RONALD J. DIGIORNO, ESQUIRE

SUPREME COURT NO.:

39025

FILED

OCT 09 2001

**William A. Shaw
Prothonotary**

**RONALD J. DIGIORNO, ESQUIRE
150 Pleasant Drive, Suite 103
Aliquippa, PA 15001**

TELEPHONE: (724) 378-9951

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

CITIFINANCIAL SERVICES, INC., :
f/k/a COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY :
Plaintiff, :
:
vs. : No. 01-330 CD
:
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
:
Defendants. :
:

AFFIDAVIT OF SERVICE OF NOTICE OF SALE

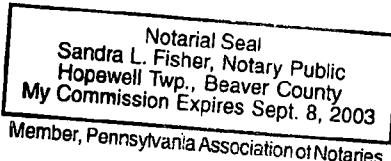
I, Ronald J. DiGiorno, do hereby certify that a Notice of Sale was mailed to all Lien Holders, by Certificate of Mailing for service in the above-captioned case on October 1, 2001 advising them of the Sheriff's Sale of the property at 115 Kate Street, Osceola Mills, PA 16666.

Ronald J. DiGiorno, Esquire
Attorney for Plaintiff

Sworn to and subscribed before me,

this 2nd day of Oct - , 2001.

Sandra L. Fisher
NOTARY PUBLIC



U.S. POSTAL SERVICE		CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL. DOES NOT PROVIDE FOR INSURANCE—POSTMASTER		
<p>Received from:</p> <p><u>Ronald J. DiGiorno</u> <u>150 Pleasant Dr.</u> <u>Alquippa, PA 15001</u></p>		
<p>One piece of ordinary mail addressed to:</p> <p><u>Household Realty Corp.</u> <u>2141 S. Atherton</u> <u>State College, PA 15801</u></p>		

PS Form 3817, January 2001

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL. DOES NOT PROVIDE FOR INSURANCE—POSTMASTER		
<p>Received from:</p> <p><u>Ronald J. DiGiorno</u> <u>150 Pleasant Dr.</u> <u>Alquippa, PA 15001</u></p>		
<p>One piece of ordinary mail addressed to:</p> <p><u>Clearfield County Treasurer</u> <u>Clearfield County Courthouse</u> <u>Clearfield, PA 16830</u></p>		

PS Form 3817, January 2001

Affix fee here in stamps or meter postage and post mark. Inquire of Postmaster for current fee.

Affix fee here in stamps or meter postage and post mark. Inquire of Postmaster for current fee.

OCT 8 2001
M189 no cc
Shaw Library

卷之三

WRIT OF EXECUTION and/or ATTACHMENT
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
CIVIL ACTION – LAW

Citifinancial Services, Inc., f/k/a
Commercial Credit Plan
Consumer Discount Company,

Vs.

NO.: 2001-00330-CD

Peggy Lee Owens , and
Bobbi Jo Welch ,

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the debt, interest and costs due CITIFINANCIAL SERVICES, INC., COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY, Plaintiff(s) from PEGGY LEE OWENS , BOBBI JO WELCH , Defendant(s):

(1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:
See Attached Description

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:

Garnishee(s) as follows:

and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;

(3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE: \$20,667.63

INTEREST: from 2/26/01 to

PROTH. COSTS: \$

ATTY'S COMM: \$

DATE: 08/21/2001

PAID: \$127.00

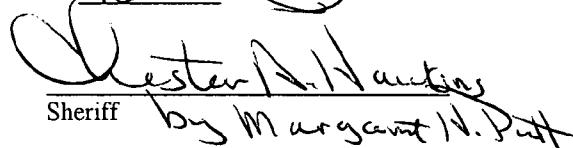
SHERIFF: \$

OTHER COSTS: \$



William A. Shaw
Prothonotary/Clerk Civil Division

Received this writ this 21st day
of August A.D. 2001
At 12:55 A.M./P.M.


Sheriff

by Margaret N. Park

Requesting Party: Ronald J. DiGiorno, Esquire
Suite 103
150 Pleasant Drive
Aliquippa, PA 15001

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
P E N N S Y L V A N I A
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC. f/k/a :
COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : No. 01-330 CD
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :
:

ALL that certain lot or piece of ground situate in the Borough of Osceola, County of Clearfield, and State of Pennsylvania, bounded and described as follows:

Beginning at a point on the South side of Kate Street seventy four (74) feet from corner of Kate Street and Morgan Street; thence along lot number 447 South 28 3/4° West one hundred fifty (150) feet to Montgomery Alley: thence along said Montgomery Alley North 61 1/4° West thirty eight (38) feet: thence along lot number 445 North 28 3/4° East one hundred fifty (150) feet to Kate Street: thence along the South side of Kate Street 61 1/4° East thirty eight (38) feet to the place of beginning. Containing about 57/75 of one lot as laid out in the general plan of said Borough and to be known as lot number 449 1/2.

HET a dwelling known as 115 Kate Street, Osceola Mills, PA 16666.

Parcel 16-013-378-12

RONALD J. DIGIORNO, ESQUIRE
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001
Telephone: (724) 378-9951

ALL THE RIGHT, TITLE, INTEREST AND CLAIM OF PEGGY LEE OWENS AND BOBBI JO WELCH, OF, IN AND TO FOLLOWING DESCRIBED REAL PROPERTY:

ALL THE FOLLOWING DESCRIBED REAL ESTATE SITUATE IN THE BOROUGH OF OSCEOLA, COUNTY OF CLEARFIELD, PENNSYLVANIA, HAVING ERECTED THEREON A DWELLING HOUSE KNOWN AS 115 KATE STREET, OSCEOLA MILLS, PENNSYLVANIA 16666, . PARCEL HG 16-013-378-12.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11433

CITIFINANCIAL SERVICES, INC F/K/A

01-330-CD

VS.

OWENS, PEGGY LEE

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

NOW, SEPTEMBER 26, 2001, AT 10:05 AM O'CLOCK A LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDANTS. PROPERTY WAS POSTED THIS DATE.

A SALE IS SET FOR FRIDAY, NOVEMBER 16, 2001, AT 10:00 AM O'CLOCK.

NOW, OCTOBER 3, 2001, AT 10:33 AM O'CLOCK SERVED WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY ON PEGGY L. OWENS, DEFENDANT, AT HER PLACE OF RESIDENCE, 106 1/2 KATE STREET, OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA, 16666, BY HANDING TO PEGGY L. OWENS, DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY AND MADE KNOWN TO HER THE CONTENTS THEREOF.

NOW, OCTOBER 3, 2001, AT 10:33 AM O'CLOCK SERVED WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY ON PEGGY L. OWENS, ADULT AT RESIDENCE, FOR BOBBI JO WELCH, DEFENDANT, AT HER PLACE OF RESIDENCE, 106 1/2 KATE STREET, OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA, 16666, BY HANDING TO PEGGY L. OWENS, ADULT AT RESIDENCE, FOR BOBBI JO WELCH, DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY AND MADE KNOWN TO HER THE CONTENTS THEREOF.

NOW, NOVEMBER 16, 2001, A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANTS. PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR ONE (\$1.00) DOLLAR PLUS COSTS.

NOW, NOVEMBER 19, 2001, SENT A BILL TO THE ATTORNEY FOR THE COSTS DUE ON SALE.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11433

CITIFINANCIAL SERVICES, INC F/K/A

01-330-CD

VS.

OWENS, PEGGY LEE

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

NOW, DECEMBER 10, 2001, RECEIVED PLAINTIFF CHECK #38753 14602 IN THE AMOUNT OF NINE HUNDRED THIRTEEN DOLLARS AND NINETY-FIVE CENTS (\$913.95) FOR COSTS DUE.

NOW, JANUARY 9, 2001, RETURN WRIT AS A SALE BEING HELD WITH THE PLAINTIFF PURCHASING THE PROPERTY FOR ONE DOLLARS (\$1.00) PLUS COSTS. PAID COSTS FROM ADVANCE WITH THE PLAINTIFF PAYING THE REMAINING COSTS. DEED WAS FILED THIS DATE.

SHERIFF HAWKINS \$229.08

SURCHARGE \$ 40.00

PAID BY PLAINTIFF

FILED

JAN 09 2002

013.211

William A. Shaw
Prothonotary

Sworn to Before Me This

9th Day Of January 2002

William A. Shaw
WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,

Chester A. Hawkins
by Maryann H. Putt
Chester A. Hawkins
Sheriff

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

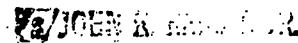
CITIFINANCIAL SERVICES, INC. f/k/a :
COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : No. 01-330 CD
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :

ORDER

AND NOW, to-wit, this 2nd day of May, 2001, upon
consideration of Plaintiffs Motion and the Affidavit of Reasonable Investigation attached thereto,
it is hereby ORDERED that Plaintiff may obtain service of the Complaint in Mortgage
Foreclosure on the above-captioned Defendants. **Peggy Lee Owens and Bobbi Jo Welch**, by
mailing a true and correct copy of the Complaint in Mortgage Foreclosure by Certified Mail and
Regular Mail, by posting the premises at 115 Kate Street, Osceola Mills, PA 16666 by the
Sheriff, and Notice by publication in Courier Express.

Service of the aforementioned mailing is effective upon the date of mailing and is to be
done by Plaintiff's attorney, who will file with the Prothonotary's Office an Affidavit as to the
mailing. FURTHER, that in the event that this case should be reduced to judgment and
execution shall be issued, service upon the Defendants pursuant to Rule 3129.2(c) shall be
effected by posting a copy of the Notice of Sale of Sheriff's handbill on the most public party of
the premises and by publication by the Sheriff to Pennsylvania Rule of Civil Procedure 3129.(d).

COPY BY THE COURT:



J.



1341 S ATHERTON ST. STE. 2
STATE COLLEGE PA 16801-0000

Pay to: SHERIFF OF CLEARFIELD COUNTY

The
Amount of: NINE HUNDRED THIRTEEN AND 95/100 DOLLARS

Mellon Bank, N.A., Pittsburgh, Pennsylvania

MEMO 207332 SHERIFF SERVICES OWENS

Ex-111433 110 38753 14602 10433016010 102 156 710

COPY

DOCUMENT CONTAINS MICRO PRINT • ARTIFICIAL WATERMARK ON BACK • VERIFICATION BOX ON BACK
TO: RIGHT OF ARROW, HOLD BETWEEN THUMB AND FOREFINGER, OR BREATHE ON IT; COLOR WILL DISAPPEAR, THEN REAPPEAR

60-160
433

Date 11/30/2001 No 38753 14602

\$913.95
DOLLAR NINE HUNDRED THIRTEEN AND NINETY FIVE

By: *Ruth D Koch*

AUTHORIZED SIGNER

MP

By: *Jeffrey A. Coff*

AUTHORIZED SIGNER

MP

REAL ESTATE SALE

REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION

REAL ESTATE SALE

NOW, NOVEMBER 19, 2001 by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting forth the date, time and place of sale at the Court House in Clearfield on the 16th day of NOVEMBER 2001, I exposed the within described real estate of PEGGY LEE OWENS AND BOBBI JO WELCH

to public venue or outcry at which time and place I sold the same to CITIFNANCIAL SERVICES, INC., f/k/a COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT he/she being the highest bidder, for the sum of \$ 1.00 + COSTS and made the following appropriations, viz.: COMPANY

SHERIFF COSTS:

RDR	\$ 15.00
SERVICE	15.00
MILEAGE	13.00
LEVY	15.00
MILEAGE	13.00
POSTING	15.00

CSDS	10.00
COMMISSION 2%	
POSTAGE	4.08
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	13.00
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES / BILLING	15.00
BILLING - PHONE - FAX	
TOTAL SHERIFF COSTS	\$ 229.08

DEED COSTS:

REGISTER & RECORDER	\$ 16.00
ACKNOWLEDGEMENT	5.00
TRANSFER TAX 2%	
TOTAL DEED COSTS	\$ 21.00

DEBT & INTEREST:

DEBT-AMOUNT DUE	\$ 20,667.63
INTEREST FROM 2-26-01	
TO BE ADDED	
TOTAL DEBT & INTEREST	\$ 20,667.63

COSTS:

ATTORNEY FEES	
PROTH. SATISFACTION	
ADVERTISING	\$ 220.83
LATE CHARGES & FEES	
TAXES-Collector	\$ 592.91
TAXES-Tax Claim	\$ 493.13
COSTS OF SUIT-To Be Added	
LIST OF LIENS AND MORTGAGE SEARCH	\$ 140.00
FORCLOSURE FEES	
ACKNOWLEDGEMENT	\$ 5.00
DEED COSTS	\$ 16.00
ATTORNEY COMMISSION	
SHERIFF COSTS	\$ 229.08
LEGAL JOURNAL AD	\$ 90.00
REFUND OF ADVANCE	
REFUND OF SURCHARGE	
PROTHONOTARY	\$ 127.00

TOTAL COSTS \$ 1,913.95

DISTRIBUTION WILL BE MADE IN ACCORDANCE WITH THE ABOVE SCHEDULE UNLESS EXCEPTIONS ARE FILED WITH THIS OFFICE WITHIN TEN (10) DAYS FROM THIS DATE.

Chester A. Hawkins, Sheriff