

UL-311-CD
WASHINGTON MUTUAL HOME LOANS, INC. et al -vs- DONALD P. REICH

FEDERMAN AND PHELAN L.L.P.

By: Frank Federman, Esquire

Identification No. 12248

One Penn Center @ Suburban Station, Suite 1400

1617 John F. Kennedy Boulevard

Philadelphia, PA 19103-1814

(215) 563-7000

Attorney for Plaintiff

WASHINGTON MUTUAL HOME LOANS, INC.,

PNC MORTGAGE CORP. OF AMERICA

539 SOUTH FOURTH AVENUE

LOUISVILLE, KY 40202

: Court of Common Pleas

: Civil Division

v.

: CLEARFIELD County

: Term

DONALD P. REICH

OR OCCUPANTS

JOLLY ROGER ROAD, A/K/A

LOT #12, SECTION 6-A, "JAMAICA" TREASURE LAKE

DUBOIS, PA 15801

: No. 01-371-60

:

CIVIL ACTION - EJECTMENT - 3020

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 (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 and 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 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**

FILED

MAR 14 2001

**William A. Shaw
Prothonotary**

1. Plaintiff is WASHINGTON MUTUAL HOME LOANS, INC., PNC MORTGAGE CORP. OF AMERICA.
2. Defendant is DONALD P. REICH OR OCCUPANTS .
3. Plaintiff is the owner of premises located at JOLLY ROGER ROAD, A/K/A LOT #12, SECTION 6-A, "JAMAICA" TREASURE LAKE, DUBOIS, PA 15801, a legal description of which is attached.
4. Plaintiff became owner of said premises by a Deed from the Sheriff of CLEARFIELD County, which Deed was lodged and settlement made with the Sheriff (Abstract of Title).
5. Plaintiff, by virtue of the above, is the owner of said premises, and is entitled to possession thereof. The defendant is occupying the said premises without right and so far as the plaintiff is informed, without claim of title.
6. Plaintiff has demanded possession of the said premises from the said defendant who has refused to deliver up possession of same.

WHEREFORE, plaintiff seeks to recover possession of said premises.


FRANK FEDERMAN
Attorney for Plaintiff

ARACOR Search and Abstract Services, Inc.
One Penn Center, 1617 J.F.K. Boulevard, Suite 305
Philadelphia, Pennsylvania 19103
(215) 496-0900
FAX (215) 496-0904

RECORD OWNER AND LIEN CERTIFICATE

Effective Date: 10/21/1999

Order Number: A36141

Client Number:

Premises: LOT #12, SECTION NO. 6A, "JAMAICA" TREASURE LAKE, TOWNSHIP OF
SANDY
CLEARFIELD COUNTY
PA

Based upon the examination of evidence in the appropriate public records, Company certifies that the premises endorsed hereon are subject to the liens, encumbrances and exceptions to title hereinafter set forth. This Certificate does not constitute title insurance; liability hereunder is assumed by the Company solely in its capacity as an abstractor for its negligence, mistakes or omissions in a sum not to exceed Two Thousand Dollars.

DESCRIPTION

ALL THAT CERTAIN tract of land designated as Lot No. 12, Section No. 6A "Jamaica", in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Miscellaneous Docket Map File No. 24.

BEING Tax Parcel # 128-CO2-06A-00012-00-21.

VERIFICATION

Susan Peterson Hereby states that he/ she is the is the
REO Asset Manager of WASHINGTON MUTUAL HOME LOANS,
F/K/A PNC MORTGAGE CORP. OF AMERICA Mortgage servicing agent for the
Plaintiff in this matter, that he/she is authorized to take this Verification, and that the
statements made in the foregoing Civil Action in Ejectment are true and correct to the
best of his /her knowledge, information and belief. The Undersigned understands that
this statement is made subject to the penalties of 18 Pa, C.S. Sec. 4904 relating to
unsworn falsification to authorities.


Susan Peterson
REO Asset Manager

Date: 3/9/2001

FILED

MAR 14 2001

William A. Shaw
Prothonotary

Edman p2

\$80,00

1cc Sheryl

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10793

WASHINGTON MUTUAL HOME LOANS INC

01-371-CD

VS.

REICH, DONALD P.

COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW MARCH 28, 2001 AT 10:32 AM EST SERVED THE WITHIN COMPLAINT IN
EJECTMENT ON DONALD P. REICH OR OCCUPANTS, DEFENDANT AT RESIDENCE,
JOLLY ROGER ROAD, LOT 12, SEC. 6A, TREASURE LAKE, DUBOIS, CLEARFIELD
COUNTY, PENNSYLVANIA BY HANDING TO BEVERLY REICH, WIFE, A TRUE AND
ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN
TO HER THE CONTENTS THEREOF.
SERVED BY: COUDRIET

Return Costs

| Cost | Description |
|-------|------------------------------|
| 47.64 | SHFF. HAWKINS PAID BY: ATTY. |
| 10.00 | SURCHARGE PAID BY: ATTY. |

Sworn to Before Me This

2nd Day Of April 2001

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

So Answers,

Chester A. Hawkins
by Marilyn Hamer
Chester A. Hawkins
Sheriff

FILED

APR 02 2001
0/12:00 PM
William A. Shaw
Prothonotary *ES*

Commonwealth of Pennsylvania

COUNTY OF CLEARFIELD

WASHINGTON MUTUAL HOME LOANS, INC., f/k/a
PNC MORTGAGE CORP. OF AMERICA

COURT OF COMMON PLEAS

22.

TERM, 19__

DONALD P. REICH OR OCCUPANTS
JOLLY ROGER ROAD, a/k/a LOT #12
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801NO. 2001-317-CD
³⁷¹WRIT OF POSSESSION

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: WASHINGTON MUTUAL HOME LOANS, INC., f/k/a
PNC MORTGAGE CORP. OF AMERICA

(2) To satisfy the costs against

DONALD P. REICH OR OCCUPANTS
JOLLY ROGER ROAD, a/k/a LOT #12
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801

directed to levy upon any property of

RECEIVED MAY 7 2001

@ 9:45 AM
Christen A. Harting
by Margaret H. Pitt

interest therein.

you are

DONALD P. REICH OR OCCUPANTS
JOLLY ROGER ROAD, a/k/a LOT #12
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801

and sell

Prothonotary

By

William L. Shaw

Clerk

Date

May 4, 2001

Count of Common Pleas

TERM, 19

NO. 2001-371-CD

WASHINGTON MUTUAL HOME LOANS, INC., f/k/a
PNC MORTGAGE CORP. OF AMERICA

vs.

DONALD P. REICH OR OCCUPANTS
JOLLY ROGER ROAD, a/k/a LOT #12
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801

WIT OF POSSESSION

Federman and Phelan, LLP
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814


FRANK FEDERMAN

In The Court of Common Pleas of Clearfield County, Pennsylvania

WASHINGTON MUTUAL HOME LOANS, INC., ET AL

VS.

REICH, DONALD P.

91-371-88
-01-317-CD

Sheriff Docket #

11018

WRIT OF POSSESSION

SHERIFF RETURNS

NOW, MAY 25, 2001, AT 10:17 AM O'CLOCK SERVED WRIT OF POSSESSION ON BEVERLY REICH, OCCUPANT/WIFE OF DONALD P. REICH, DEFENDANT, AT HER PLACE OF RESIDENCE, JOLLY ROGER ROAD, A/K/A LOT #12, SECTION 6-A, "JAMAICA" TREASURE LAKE, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, 15801, BY HANDING TO BEVERLY REICH, OCCUPANT/WIFE OF DONALD P. REICH, DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF POSSESSION AND MADE KNOWN TO HER THE CONTENTS THEREOF.

NOW, JUNE 4, 2001, DEPUTY CHECKED RESIDENCE, OCCUPANTS WERE STILL THERE.

NOW, JUNE 29, 2001, DEPUTY CHECKED RESIDENCE, OCCUPANTS WERE MOVING AND EVERYTHING WILL BE OUT MONDAY, JULY 2, 2001.

NOW, JULY 11, 2001, RETURN WRIT AS BEING SERVED, PAID COSTS FROM ADVANCE AND MADE REFUND OF UNUSED ADVANCE TO THE ATTORNEY.

SHERIFF HAWKINS \$73.40
SURCHARGE 10.00
PAID BY ATTORNEY

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11018

WASHINGTON MUTUAL HOME LOANS, INC., ET AL

~~01-347-CD~~

VS.

REICH, DONALD P.

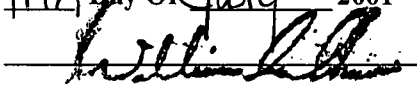
01-371-CD

WRIT OF POSSESSION

SHERIFF RETURNS

Sworn to Before Me This

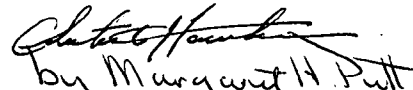
11th Day Of July 2001



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



So Answers,


by Margaret H. Pitt
Chester A. Hawkins
Sheriff

FILED

JUL 11 2001
01324
William A. Shaw
Prothonotary

FEDERMAN AND PHELAN
BY: FRANK FEDERMAN
IDENTIFICATION NO. 12248
One Penn Center @ Suburban Station, Suite 1400
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

WASHINGTON MUTUAL HOME LOANS, INC.,
F/K/A PNC MORTGAGE CORP. OF AMERICA

: COURT OF COMMON PLEAS

: CIVIL DIVISION

:
: No. 01-371-CD

vs
DONALD P. REICH
OR OCCUPANTS
JOLLY ROGER ROAD, A/K/A LOT #12,
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801

: CLEARFIELD County

PRAECIPE FOR JUDGMENT IN EJECTMENT

TO THE PROTHONOTARY:

Kindly enter Judgment in Ejectment in favor of the Plaintiff, WASHINGTON MUTUAL HOME LOANS, INC., F/K/A PNC MORTGAGE CORP. OF AMERICA and against the Defendant(s) DONALD P. REICH and OR OCCUPANTS for possession of premises JOLLY ROGER ROAD, A/K/A LOT #12, SECTION 6-A, "JAMAICA" TREASURE LAKE, DUBOIS, PA 15801 for failure to file an Answer within twenty (20) days of service.

I hereby certify that according to Rule 237.1, written 10 day notice of Plaintiff's intention to file a praecipe for Entry of default Judgment was mailed to Defendant(s), a true and correct copy of which is attached hereto.


FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

Default Judgment entered as indicated above.

DATE

FILED

MAY 04 2001

William A. Shaw
Prothonotary

FEDERMAN AND PHELAN

Frank Federman, Esquire

Identification No. 12248

ATTORNEY FOR PLAINTIFF

One Penn Center @ Suburban Station, Suite 1400

1617 John F. Kennedy Boulevard

Philadelphia, PA 19103-1814

(215) 563-7000

WASHINGTON MUTUAL HOME LOANS, INC.,

PNC MORTGAGE CORP. OF AMERICA

: Court of Common Pleas

: Civil Division

v.

: CLEARFIELD COUNTY

DONALD P. REICH

: No. 01-371-CD.

OR OCCUPANTS

TO: DONALD P. REICH OR OCCUPANTS

JOLLY ROGER ROAD,

A/K/A LOT #12, SECTION 6-A, "JAMAICA" TREASURE LAKE

DUBOIS, PA 15801

DATE OF NOTICE: APRIL 18, 2001

THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE.

IMPORTANT NOTICE

You are in default because you have failed to enter a written appearance personally or by attorney and file in writing with the court your defenses or objections to the claims set forth against you.

Unless you act within ten (10) days from the date of this notice, a Judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to 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:

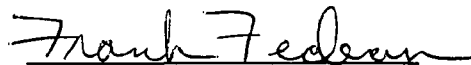
LAWYER REFERRAL SERVICE

CLEARFIELD COUNTY COURTHOUSE

DAVID S. MEHOLICK, COURT ADMINISTRATOR

CLEARFIELD, PA 16830

(814) 765-2641



Frank Federman, Esquire

Attorney for Plaintiff

PRAECIPE FOR WRIT OF POSSESSION

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CLEARFIELD

WASHINGTON MUTUAL HOME LOANS, INC.,
F/K/A PNC MORTGAGE CORP. OF AMERICA

: COURT OF COMMON PLEAS

: CIVIL DIVISION

:

: No. **01-371-CD**

vs
DONALD P. REICH
OR OCCUPANTS

:

CLEARFIELD County

JOLLY ROGER ROAD, A/K/A LOT #12,
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801

PRAECIPE FOR WRIT OF POSSESSION

TO THE PROTHONOTARY:

Issue Writ of Possession in the above matter for possession of:

JOLLY ROGER ROAD, A/K/A LOT #12, SECTION 6-A, "JAMAICA" TREASURE LAKE,
DUBOIS, PA 15801

****PLEASE SEE THE ATTACHED LEGAL DESCRIPTION****

FILED

MAY 04 2001

William A. Shaw
Prothonotary

Being Known as No. JOLLY ROGER ROAD, A/K/A LOT #12, SECTION 6-A, "JAMAICA"
TREASURE LAKE


FRANK FEDERMAN, ESQUIRE
ATTORNEY FOR PLAINTIFF

Commonwealth of Pennsylvania

COPY

COUNTY OF CLEARFIELD

WASHINGTON MUTUAL HOME LOANS, INC., f/k/a
PNC MORTGAGE CORP. OF AMERICA

COURT OF COMMON PLEAS

02.

TERM, 19

DONALD P. REICH OR OCCUPANTS
JOLLY ROGER ROAD, a/k/a LOT #12
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801

NO. 2001-317-CD

WRIT OF POSSESSION

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: WASHINGTON MUTUAL HOME LOANS, INC., f/k/a
PNC MORTGAGE CORP. OF AMERICA

(2) To satisfy the costs against

DONALD P. REICH OR OCCUPANTS
JOLLY ROGER ROAD, a/k/a LOT #12
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801

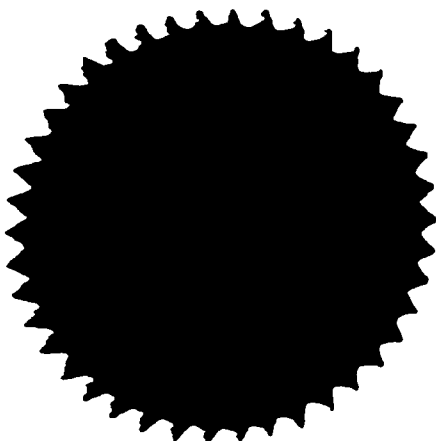
directed to levy upon any property of

DONALD P. REICH OR OCCUPANTS
JOLLY ROGER ROAD, a/k/a LOT #12
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801

you are

and sell

interest therein.



Prothonotary

By William L. Shaw
ClerkDate May 4, 2001

Court of Common Pleas

_____, TERM, 19 ____

NO. 2001-371-CD

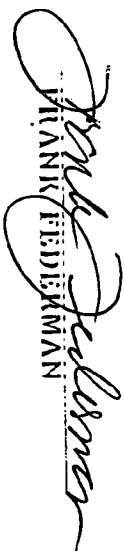
WASHINGTON MUTUAL HOME LOANS, INC., f/k/a
PNC MORTGAGE CORP. OF AMERICA

vs.

DONALD P. REICH OR OCCUPANTS
JOLLY ROGER ROAD, a/k/a LOT #12
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801

WRIT OF POSSESSION

Federman and Phelan, LLP
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814


FRANK FEDERMAN

ARACOR Search and Abstract Services, Inc.
One Penn Center, 1617 J.F.K. Boulevard, Suite 305
Philadelphia, Pennsylvania 19103
(215) 496-0900
FAX (215) 496-0904

RECORD OWNER AND LIEN CERTIFICATE

Effective Date: 10/21/1999

Order Number: A36141

Client Number:

Premises: LOT #12, SECTION NO. 6A, "JAMAICA" TREASURE LAKE, TOWNSHIP OF
SANDY
CLEARFIELD COUNTY
PA

Based upon the examination of evidence in the appropriate public records, Company certifies that the premises endorsed hereon are subject to the liens, encumbrances and exceptions to title hereinafter set forth. This Certificate does not constitute title insurance; liability hereunder is assumed by the Company solely in its capacity as an abstractor for its negligence, mistakes or omissions in a sum not to exceed Two Thousand Dollars.

DESCRIPTION

ALL THAT CERTAIN tract of land designated as Lot No. 12, Section No. 6A "Jamaica", in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Miscellaneous Docket Map File No. 24.

BEING Tax Parcel # 128-CO2-06A-00012-00-21.

ATTORNEY FOR PLAINTIFF

BY: FRANK FEDERMAN

IDENTIFICATION NO. 12248

One Penn Center Plaza @ Suburban Station, Suite 1400

1617 John F. Kennedy Boulevard

Philadelphia, PA 19103-1814

(215) 563-7000

WASHINGTON MUTUAL HOME LOANS, INC.,
F/K/A PNC MORTGAGE CORP. OF AMERICA

: COURT OF COMMON PLEAS

: CIVIL DIVISION

No. **01-371-CD**

: CLEARFIELD County

vs
DONALD P. REICH
OR OCCUPANTS
JOLLY ROGER ROAD, A/K/A LOT #12,
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801

VERIFICATION OF NON-MILITARY SERVICE

FRANK FEDERMAN, ESQUIRE, hereby verifies that he is Attorney for Plaintiff in the above captioned matter, and that on information and belief, he has knowledge of the following facts, to wit:

(a) That the defendant(s) is/are not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of Congress of 1940, as amended.

(b) That defendant DONALD P. REICH Or occupants, is over 18 years of age, and resides at JOLLY ROGER ROAD, A/K/A LOT #12, SECTION 6-A, "JAMAICA" TREASURE LAKE, DUBOIS, PA 15801.

This statement is made subject to the penalties of 18 PA. C.S.S 4904 relating to unsworn falsification to authorities.


FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

FILED No cc
M13:29:21 Atty pd 20:00
MAY 14 2001
William A. Shaw 2 Writs to
Prothonotary SHS
WAS

OFFICE OF THE PROTHONOTARY

COPY

**TO: DONALD P. REICH OR OCCUPANTS
JOLLY ROGER ROAD, A/K/A LOT #12,
SECTION 6-A, "JAMAICA" TREASURE LAKE
DUBOIS, PA 15801**

WASHINGTON MUTUAL HOME LOANS, INC.,
F/K/A PNC MORTGAGE CORP. OF AMERICA

| | | |
|--------------------------------------|---|-----------------------|
| | : | COURT OF COMMON PLEAS |
| | : | CIVIL DIVISION |
| | : | |
| vs | : | No. 01-371-CD |
| DONALD P. REICH | : | |
| OR OCCUPANTS | : | CLEARFIELD County |
| JOLLY ROGER ROAD, A/K/A LOT #12. | | |
| SECTION 6-A. "JAMAICA" TREASURE LAKE | | |
| DUBOIS, PA 15801 | | |

Attorney ID # 12248

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.

Prothonotary

- Judgment by Default
- Money Judgment
- Judgment in Replevin
- ~~XX~~ Judgment for Possession
- Judgment on Award of Arbitration
- Judgment on Verdict
- Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:
ATTORNEY: FRANK FEDERMAN Esquire, at this telephone number: (215) 563-7000