

01-414-CD
HOMECOMINGS FINANCIAL NETWORK -vs- ROCKLAND L. FUTMER

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

HOMECOMINGS FINANCIAL NETWORK
9275 SKY PARK COURT, SUITE 300
SAN DIEGO, CA 92123

: Court of Common Pleas

: Civil Division

: CLEARFIELD County

: Term

: No. 2001-414-CV

ROCKLAND L. FULMER
OR OCCUPANTS
RD 4, BOX 62 WALKER ROAD
CLEARFIELD, PA 16830

:

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 22 2001
0/4:00 (ms)
William A. Shaw
Prothonotary

PP
80.-

I CERT TO ATTY
I CERT TO STAFF

1. Plaintiff is HOMECOMINGS FINANCIAL NETWORK.
2. Defendant is ROCKLAND L. FULMER OR OCCUPANTS .
3. Plaintiff is the owner of premises located at RD 4, BOX 62 WALKER ROAD, CLEARFIELD, PA 16830, 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: 2/22/2000

Order Number: A39306
Client Number: FULMER ✓

Premises: RD 4, BOX 62, WALKER ROAD, TOWNSHIP OF PIKE
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

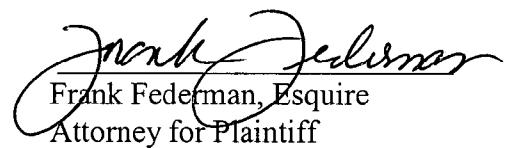
ALL THAT CERTAIN parcel of land situate in Pike Township, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a point in the centerline of Township Road No. T-517, said point being North 58 degrees 20 minutes 20 seconds West a distance of 443.89 feet from a nail in the centerline of said Township Road being the northeast corner of lands of which this is a part, said point being also the northeasterly corner of the land hereby conveyed and running; thence along Ronald E. Fulmer for a new line South 32 degrees 47 minutes 20 seconds West a distance of 185.95 feet to an iron pin at the southeasterly corner of the land hereby conveyed, said line passing through an iron pin being set 18.86 feet from the centerline of said Township Road; thence along the same for a new line North 67 degrees 52 minutes 20 seconds West a distance of 213.76 feet to an iron pin at the southwesterly corner of the land hereby conveyed; thence still along the same for a new line North 32 degrees 47 minutes 20 seconds East a distance of 225.50 feet to a point on the centerline of T-517 and at the northwesterly corner of the land hereby conveyed, said line passing through an iron pin being set back 18.39 feet from the centerline of T-517; thence along the centerline of %517 South 57 degrees 12 minutes 40 seconds East a distance of 210.07 feet to the place of beginning. CONTAINING 0.913 acres as surveyed by Lex W. Curry, Registered Surveyor dated July 25, 1986, a copy of said survey being attached hereto and made a part hereof.

TAX PARCEL #126-108-0-60

VERIFICATION

Frank Federman, Esquire hereby states that he is the Attorney for the Plaintiff in this matter, that he 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 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.



Frank Federman, Esquire
Attorney for Plaintiff

Date: 3/16/2001

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10820

HOECOMINGS FINANCIAL NETWORK

01-414-CD

VS.

FULMER, ROCKLAND L.

COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW MARCH 30, 2001 AT 10:47 AM EST SERVED THE WITHIN COMPLAINT IN EJECTMENT ON ROCKLAND L. FULMER OR OCCUPANTS, DEFENDANT AT RESIDENCE, RD # 4, BOX 62, WALKER ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING LORRIE MINICH, ADULT AT RESIDENCE, A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

Return Costs

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

FILED

APR 04 2001
011108 100 C
William A. Shaw
Prothonotary

Sworn to Before Me This

4th Day of April 2001
William A. Shaw

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

So Answers,

Chester A. Hawkins
Chester A. Hawkins
Sheriff

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

HOMECOMINGS FINANCIAL NETWORK

: COURT OF COMMON PLEAS
: CIVIL DIVISION
: No. 2001-414-CD
vs :
ROCKLAND L. FULMER :
OR OCCUPANTS : CLEARFIELD County
RD 4, BOX 62 WALKER ROAD :
CLEARFIELD, PA 16830

PRAECIPE FOR JUDGMENT IN EJECTMENT

TO THE PROTHONOTARY:

Kindly enter Judgment in Ejectment in favor of the Plaintiff, HOMECOMINGS FINANCIAL NETWORK and against the Defendant(s) ROCKLAND L. FULMER and OR OCCUPANTS for possession of premises RD 4, BOX 62 WALKER ROAD , CLEARFIELD, PA 16830 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

HOMECOMINGS FINANCIAL NETWORK

: Court of Common Pleas

: Civil Division

v.

: CLEARFIELD COUNTY

ROCKLAND L. FULMER

OR OCCUPANTS

: No. 2001-414-CD.

TO: ROCKLAND L. FULMER OR OCCUPANTS
RD 4, BOX 62 WALKER ROAD
CLEARFIELD, PA 16830

DATE OF NOTICE: APRIL 20, 2001

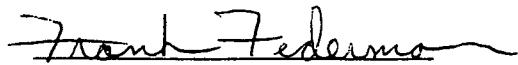
THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE.

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

FILED 10 CC
MAY 13 2001 Atty pd. 20.00
MAY 04 2001 Notice to Def
William A. Shaw
Prothonotary

PRAECIPE FOR WRIT OF POSSESSION

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF CLEARFIELD

HOMECOMINGS FINANCIAL NETWORK

: COURT OF COMMON PLEAS

: CIVIL DIVISION

: : No. 2001-414-CD

vs

ROCKLAND L. FULMER
OR OCCUPANTS
RD 4, BOX 62 WALKER ROAD
CLEARFIELD, PA 16830

: CLEARFIELD County

PRAECIPE FOR WRIT OF POSSESSION

TO THE PROTHONOTARY:

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

RD 4, BOX 62 WALKER ROAD ,
CLEARFIELD, PA 16830

PLEASE SEE THE ATTACHED LEGAL DESCRIPTION*

FILED

MAY 9 4 2001

William A. Shaw
Prothonotary

Being Known as No. RD 4, BOX 62 WALKER ROAD


FRANK FEDERMAN, ESQUIRE
ATTORNEY FOR PLAINTIFF

Commonwealth of Pennsylvania

COUNTY OF CLEARFIELD

HOMECOMINGS FINANCIAL NETWORK

COURT OF COMMON PLEAS

vs.

TERM, 19

ROCKLAND L. FULMER OR OCCUPANTS
 RD 4, BOX 62 WALKER ROAD
 CLEARFIELD, PA 16830

NO. 2001-414-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: HOMECOMINGS FINANCIAL NETWORK

(2) To satisfy the costs against

ROCKLAND L. FULMER OR OCCUPANTS
 RD 4, BOX 62 WALKER ROAD
 CLEARFIELD, PA 16830

directed to levy upon any property of

ROCKLAND L. FULMER OR OCCUPANTS
 RD 4, BOX 62 WALKER ROAD
 CLEARFIELD, PA 16830

interest therein.

you are

and sell

Prothonotary

By _____

Clark

Date _____

Court of Common Pleas

PERMIT, 19

NO. 2001-414-CD

HOMECOMINGS FINANCIAL NETWORK

ROCKLAND L. FULMER OR OCCUPANTS
RD 4, BOX 62 WALKER ROAD
CLEARFIELD, PA 16830

WRIT OF POSSESSION

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

Frank Feideman
FRANK FEIDEMAN

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: 2/22/2000

Order Number: A39306
Client Number: FULMER ✓

Premises: RD 4, BOX 62, WALKER ROAD, TOWNSHIP OF PIKE
CLEARFIELD COUNTY
PA

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TAX PARCEL #126-108-0-60

FEDERMAN AND PHELAN L.L.P.
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

ATTORNEY FOR PLAINTIFF

HOMECOMINGS FINANCIAL NETWORK

: COURT OF COMMON PLEAS

: CIVIL DIVISION

: vs
ROCKLAND L. FULMER
OR OCCUPANTS : No. 2001-414-CD
RD 4, BOX 62 WALKER ROAD : CLEARFIELD County
CLEARFIELD, PA 16830

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 ROCKLAND L. FULMER Or occupants, is over 18 years of age, and resides at RD 4, BOX 62 WALKER ROAD , CLEARFIELD, PA 16830.

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 10cc
MAY 13 2001 Atty pd. 20.00
MAY 14 2001
William A. Shaw & Wits to Sheriff
Prothonotary
ECC

OFFICE OF THE PROTHONOTARY

COURT OF COMMON PLEAS

COPY

**TO: ROCKLAND L. FULMER OR OCCUPANTS
RD 4, BOX 62 WALKER ROAD
CLEARFIELD, PA 16830**

HOECOMINGS FINANCIAL NETWORK

: COURT OF COMMON PLEAS

: CIVIL DIVISION

: No. 2001-414-CD

: CLEARFIELD County
vs
ROCKLAND L. FULMER
OR OCCUPANTS
RD 4, BOX 62 WALKER ROAD
CLEARFIELD, PA 16830

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
- 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.

Commonwealth of Pennsylvania

COUNTY OF CLEARFIELD

HOMECOMINGS FINANCIAL NETWORK

COURT OF COMMON PLEAS

TERM, 19

72
ROCKLAND L. FULMER OR OCCUPANTS
RD 4, BOX 62 WALKER ROAD
CLEARFIELD, PA 16830

NO. 2001-414-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: HOMECOMINGS FINANCIAL NETWORK

(2) To satisfy the costs against

ROCKLAND L. FULMER OR OCCUPANTS
RD 4, BOX 62 WALKER ROAD
CLEARFIELD, PA 16830

directed to levy upon any property of

RECEIVED MAY 7 2001

@ 9:45 AM

Chester A. Hawkins
by Margaret H. [initials]

Interest the

COPY

ROCKLAND L. FULMER OR OCCUPANTS
RD 4, BOX 62 WALKER ROAD
CLEARFIELD, PA 16830

you are

and sell

Prothonotary

William J. [initials]

By _____
Clerk

Date May 4, 2001

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11019

HOMECOMINGS FINANCIAL NETWORK

01-414-CD

VS.

FULMER, ROCKLAND L.

WRIT OF POSSESSION

SHERIFF RETURNS

**NOW, MAY 23, 2001, AT 10:00 AM O'CLOCK SERVED WRIT OF POSSESSION
ON ROCKLAND FULMER, DEFENDANT, AT HIS PLACE OF RESIDENCE,
RD #4, BOX 62, WALKER ROAD, CLEARFIELD, CLEARFIELD COUNTY,
PENNSYLVANIA, 16830, BY HANDING TO ROCKLAND FULMER,
DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT
OF POSSESSION AND MADE KNOWN TO HIM THE CONTENTS THEREOF.**

**NOW, JUNE 6, 2001, AT 2:30PM O'CLOCK DEPUTIES CHECKED RESIDENCE,
RESIDENCE IS EMPTY.**

**NOW, JUNE 12, 2001, RETURN WRIT AS BEING SERVED, PAID COSTS FROM
ADVANCE AND MADE REFUND TO THE ATTORNEY.**

**SHERIFF HAWKINS \$21.00
SURCHARGE 10.00
PAID BY ATTORNEY**

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11019

HOECOMINGS FINANCIAL NETWORK

01-414-CD

VS.

FULMER, ROCKLAND L.

WRIT OF POSSESSION

SHERIFF RETURNS

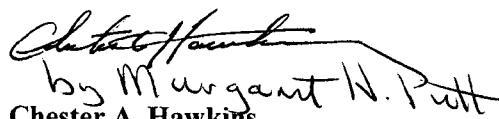
Sworn to Before Me This

12th 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. Pott
Chester A. Hawkins
Sheriff

FILED

JUN 12 2001
013:46 AM
William A. Shaw
Prothonotary