

01-1099-CD
GMAC MORTGAGE CORPORATION -vs- HEATHER L. MERCURIO

01-1099-CD
GMAC MORTGAGE CORPORATION

FEDERMAN AND PHELAN, LLP
By: FRANK FEDERMAN, ESQUIRE
IDENTIFICATION NO. 12248
ONE PENN CENTER AT SUBURBAN STATION
1617 JOHN F. KENNEDY BOULEVARD
SUITE 1400
PHILADELPHIA, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE
P.O. BOX 780
WATERLOO, IA 50704

COURT OF COMMON PLEAS
CIVIL DIVISION

Plaintiff

v.

TERM

NO. 01-1099-CD

CLEARFIELD COUNTY

HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD
#726
NAPLES, FL 34110

Defendant(s)

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

NOTICE

****THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY AND THIS DEBT WAS NOT REAFFIRMED, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY. ****

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE 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

JUL 09 2001

William A. Shaw
Prothonotary

**IF THIS IS THE FIRST NOTICE THAT YOU
HAVE RECEIVED FROM THIS OFFICE, BE
ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF
THE DEBT OR ANY PORTION THEREOF. IF
DEFENDANT(S) DO SO IN WRITING WITHIN
THIRTY (30) DAYS OF RECEIPT OF THIS
PLEADING, COUNSEL FOR PLAINTIFF WILL
OBTAIN AND PROVIDE DEFENDANT(S) WITH
WRITTEN VERIFICATION THEREOF;
OTHERWISE, THE DEBT WILL BE ASSUMED TO
BE VALID. LIKEWISE, IF REQUESTED WITHIN
THIRTY (30) DAYS OF RECEIPT OF THIS
PLEADING, COUNSEL FOR PLAINTIFF WILL
SEND DEFENDANT(S) THE NAME AND ADDRESS
OF THE ORIGINAL CREDITOR, IF DIFFERENT
FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT
UNTIL THE END OF THE THIRTY (30) DAY
PERIOD FOLLOWING FIRST CONTACT WITH
YOU BEFORE SUING YOU TO COLLECT THIS
DEBT. EVEN THOUGH THE LAW PROVIDES
THAT YOUR ANSWER TO THIS COMPLAINT IS
TO BE FILED IN THIS ACTION WITHIN TWENTY
(20) DAYS, YOU MAY OBTAIN AN EXTENSION OF
THAT TIME. FURTHERMORE, NO REQUEST
WILL BE MADE TO THE COURT FOR A
JUDGMENT UNTIL THE EXPIRATION OF THIRTY
(30) DAYS AFTER YOU HAVE RECEIVED THIS
COMPLAINT. HOWEVER, IF YOU REQUEST
PROOF OF THE DEBT OR THE NAME AND
ADDRESS OF THE ORIGINAL CREDITOR WITHIN
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UPON YOUR RECEIPT OF THIS COMPLAINT,
THE LAW REQUIRES US TO CEASE OUR
EFFORTS (THROUGH LITIGATION OR
OTHERWISE) TO COLLECT THE DEBT UNTIL
WE MAIL THE REQUESTED INFORMATION TO
YOU. YOU SHOULD CONSULT AN ATTORNEY
FOR ADVICE CONCERNING YOUR RIGHTS AND
OBLIGATIONS IN THIS SUIT.**

1. Plaintiff is

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE
P.O. BOX 780
WATERLOO, IA 50704

2. The name(s) and last known address(es) of the Defendant(s) are:

HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD
#726
NAPLES, FL 34110

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 4/19/99 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to ACCUBANK MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 199906239. By Assignment of Mortgage recorded 5/21/01 the mortgage was assigned to PLAINTIFF which Assignment is recorded in Assignment of Mortgage Instrument No. 200107519.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 2/1/01 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon default in such payments for a period of one month, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$50,340.43
Interest	1,571.68
1/1/01 through 6/1/01 (Per Diem \$10.34)	
Attorney's Fees	2,517.00
Cumulative Late Charges	101.05
4/19/99 to 6/1/01	
Cost of Suit and Title Search	550.00
Subtotal	\$55,080.16
Escrow	
Credit	115.48
Deficit	0.00
Subtotal	(\$ 115.48)
TOTAL	\$54,964.68

7. The attorney's fees set forth above are in conformity with the Mortgage documents and Pennsylvania Law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged.

8. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.00.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$54,964.68, together with interest from 6/1/01 at the rate of \$10.34 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.



/s/ Frank Federman

FRANK FEDERMAN, ESQUIRE

Attorney for Plaintiff

ALL that certain piece or parcel of land situate, lying and being in the City of DuBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a post at a corner formed by the intersection of the Southwesterly line of an alley (first alley Southwesterly from Olive Avenue) and the Northwesterly line of Pifer Street; thence South 31° West by line of said Pifer Street, 30 feet 6 inches to a post at corner of lot now or formerly of A. J. McElroy; thence Westerly by line of said McElroy lot, 150 feet to a post at an alley; thence in a Northerly direction by line of said alley, 50 feet to a post at the first mentioned alley; thence South 41° 15' East by line of said alley, 150 feet, more or less, to a post at Pifer Street, the place of beginning. Being known as Lot No. 115 and the Northerly part of Lot No. 116 as per H. S. Knarr's Addition to DuBois, Pennsylvania, which said plat is recorded at Clearfield, Pennsylvania in Miscellaneous Book U, page 278.

BEING the same premises which were conveyed to John R. Bross, et ux. by deed of Lyle R. Woods, et ux., dated March 27, 1992, and recorded at Clearfield, Pennsylvania, in Deeds and Records Book No. 1451, page 89.

PREMISES: 310 PIFER STREET

VERIFICATION

KRISTINE WILSON hereby states that she is FORECLOSURE SPECIALIST of
GMAC MORTGAGE CORPORATION mortgage servicing agent for Plaintiff in this matter, that she
is authorized to take this Verification, and that the statements made in the foregoing Civil Action in
Mortgage Foreclosure are true and correct to the best of 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.

Kristine Wilson

DATE: 7/3/01

FILED
Atty pd.
80.00
M 10:54 AM
JUL 13 2001
1 ccshentf
By William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11206

GMAC MORTGAGE CORPORATION

01-1099-CD

VS.

MERCURIO, HEATHER L.

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW AUGUST 9, 2001 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE
WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO
HEATHER L. MERCURIO, DEFENDANT. MOVED OVER ONE YEAR AGO.

Return Costs

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

FILED

AUG 20 2001
0110:43 am
William A. Shaw
Prothonotary

Sworn to Before Me This

20th Day of August 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
by Mauley Harris
Chester A. Hawkins
Sheriff

FEDERMAN AND PHELAN, LLP
By: FRANK FEDERMAN, ESQUIRE
IDENTIFICATION NO. 12248
ONE PENN CENTER AT SUBURBAN STATION
1617 JOHN F. KENNEDY BOULEVARD
SUITE 1400
PHILADELPHIA, PA 19103-1814
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ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE
P.O. BOX 780
WATERLOO, IA 50704

TERM

Plaintiff

NO. 01-1099-CJ

v.

CLEARFIELD COUNTY

HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD
#726
NAPLES, FL 34110

Defendant(s)

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

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**We hereby certify the
within to be a true and
correct copy of the
original filed of record
FEDERMAN AND PHELAN**

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

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

JUL 08 2001

Loan #: 306641080

Attest:

William L. Shaw
Prothonotary

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NAPLES, FL 34110

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/s/ Frank Federman
FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

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PREMISES: 310 PIFER STREET

VERIFICATION

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GMAC MORTGAGE CORPORATION mortgage servicing agent for Plaintiff in this matter, that she
is authorized to take this Verification, and that the statements made in the foregoing Civil Action in
Mortgage Foreclosure are true and correct to the best of 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.

Kristine Wilson

DATE: 7/3/01

10409
JOL

AFFIDAVIT OF SERVICE - CLEARFIELD COUNTY

PLAINTIFF **GMAC MORTGAGE CORPORATION**

NO. 01-1099-CD

DEFENDANT **HEATHER L. MERCURIO**

TYPE OF ACTION

XX Mortgage Foreclosure

XX Civil Action

FILED

SERVE AT: **15965 ARBOR VIEW BOULEVARD #726
NAPLES, FL 34110**

SEP 14 2001

SERVED

William A. Shaw
Prothonotary

Served and made known to Heather L. Mercurio
Defendant on the 25th day of August, 2001 at 9:00
o'clock, A. M., at 15965 Arbor View Blvd
City in the manner described below:

☒ Defendant personally served.
☐ Adult family member with whom Defendant(s) reside(s).
Relationship is _____
☐ Adult in charge of Defendant's residence who refused to give
name/relationship.
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s)
☐ Agent or person in charge of Defendant's office or usual place of
business.

_____ and officer of said defendant
company.

Other: _____

I, Michael Baker, a competent adult, being duly sworn according to
law, depose and state, that I personally handed to Heather Mercurio
a true and correct copy of the Summons and Civil Action Complaint
issued in the captioned case on the date and at the address indicated
above.

Sworn to and subscribed
Before me this 27th day
Of August, 2001
Notary:

By: _____

Teresa Joiner
MY COMMISSION # CC913583 EXPIRES
May 18 2004

NOT SERVED

On the _____ day of _____, 2000, at _____ o'clock
M., Defendant NOT FOUND because:

Moved _____ Unknown _____ No Answer _____ Vacant
Other: _____

Sworn to and subscribed
Before me the _____ day
Of _____, 2000.
Notary:

[Signature]

By: _____

ATTORNEY OF PLAINTIFF

FRANK FEDERMAN, ESQUIRE - I.D.#12248

Suite 1400

One Penn Center Plaza at Suburban Station

Philadelphia, PA 19103-1799

(215) 563-7000

IN THE COUNTY COURT OF THE COMMONWEALTH OF PENNSYLVANIA
IN AND FOR CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

GMAC MORTGAGE CORPORATION

Plaintiff

vs.

CASE NO: 01-1099-CD

HEATHER L. MERCURIO

Defendant(s).

SUGGESTION OF BANKRUPTCY

COMES NOW Defendant, HEATHER L. MERCURIO, and hereby suggests to the Court that on October 2, 2001, she filed in the United States Bankruptcy Court for the Middle District of Florida, Case No. 01-18372-9P3, a Petition for protection pursuant to United States Bankruptcy Code, 11 U.S.C. Chapter 13. Included in the schedule of creditors in said bankruptcy is, GMAC MORTGAGE CORPORATION, Plaintiff herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to GMAC Mortgage Corporation, c/o Frank Federman, Esq., 1617 John F. Kennedy Blvd., Ste 1400, Philadelphia PA 19103-1814, by first class U.S. Mail, postage fully prepaid, this 4th day of October, 2001.

FILED

OCT 09 2001

William A. Shaw
Prothonotary

Heather L. Mercurio
HEATHER L. MERCURIO
1190 Wildwood Lakes Blvd #104
Naples FL 34104

IN THE COUNTY COURT OF THE COMMONWEALTH OF PENNSYLVANIA
IN AND FOR CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION

S & T BANK

Plaintiff

vs.

CASE NO: CV000022601

HEATHER L. MERCURIO

Defendant(s).

_____ /

SUGGESTION OF BANKRUPTCY

COMES NOW Defendant, HEATHER L. MERCURIO, and hereby suggests to the Court that on October 2, 2001, she filed in the United States Bankruptcy Court for the Middle District of Florida, Case No. 01-18372-9P3, a Petition for protection pursuant to United States Bankruptcy Code, 11 U.S.C. Chapter 13. Included in the schedule of creditors in said bankruptcy is, S & T BANK, Plaintiff herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to S & T Bank, P.O. Box 469, Indiana PA 15701-0469, by first class U.S. Mail, postage fully prepaid, this 4th day of October, 2001.

Heather L. Mercurio
HEATHER L. MERCURIO
1190 Wildwood Lakes Blvd #104
Naples FL 34104

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

F.N.B. CONSUMER DISCOUNT CO.

Plaintiff

vs.

CASE NO: CV-0000168-01

HEATHER L. MERCURIO

Defendant(s).

_____ /

SUGGESTION OF BANKRUPTCY

COMES NOW Defendant, HEATHER L. MERCURIO, and hereby suggests to the Court that on October 2, 2001, she filed in the United States Bankruptcy Court for the Middle District of Florida, Case No. 01-18372-9P3, a Petition for protection pursuant to United States Bankruptcy Code, 11 U.S.C. Chapter 13. Included in the schedule of creditors in said bankruptcy is, F.N.B. CONSUMER DISCOUNT CO., Plaintiff herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished to F.N.B. Consumer Discount Co. PO Box 830, DuBois PA 15801, by first class U.S. Mail, postage fully prepaid, this 4th day of October, 2001.

Heather L. Mercurio
HEATHER L. MERCURIO
1190 Wildwood Lakes Blvd #104
Naples FL 34104

FEDERMAN AND PHELAN

By: FRANK FEDERMAN

Identification No. 12248

One Penn Center at Suburban

Station, Suite 1400

Philadelphia, PA 19103

(215) 563-7000

Attorney for Plaintiff

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE, PO BOX 780
WATERLOO, IA 50704

: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS

vs.

: CIVIL DIVISION

HEATHER L. MERCURIO

: NO. 01-1099-CD

15965 ARBOR VIEW BOULEVARD #726
NAPLES, FL 34110

:

**PRAECIPE FOR JUDGMENT FOR FAILURE TO
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against HEATHER L. MERCURIO, Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$54,964.68
Interest - 6/1/01 TO 10/9/01	<u>\$ 1,354.54</u>
TOTAL	\$56,319.22

I hereby certify that (1) the addresses of the Plaintiff and Defendant(s) are as shown above, and (2) that notice has been given in accordance with Rule 237.1, copy attached.


FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 10.16.01



PRO PROTHY

FILED

OCT 16 2001

William A. Shaw
Prothonotary

FEDERMAN AND PHELAN

BY: FRANK FEDERMAN, ESQUIRE

Attorney for Plaintiff

Identification No. 12248

1617 John F. Kennedy Boulevard Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

GMAC MORTGAGE CORPORATION

: COURT OF COMMON PLEAS

Plaintiff

: CIVIL DIVISION

vs.

: CLEARFIELD COUNTY

HEATHER L. MERCURIO

: NO. 01-1099-CD

Defendant(s)

TO: HEATHER L. MERCURIO

15965 ARBOR VIEW BOULEVARD, #726

NAPLES, FL 34110

DATE OF NOTICE: SEPTEMBER 18, 2001

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

IMPORTANT NOTICE

You are in default because you have failed 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:

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

Frank Federman, Esquire
Attorney for Plaintiff

FEDERMAN AND PHELAN
By: FRANK FEDERMAN
Identification No. 12248
One Penn Center at Suburban
Station, Suite 1400
Philadelphia, PA 19103
(215) 563-7000

Attorney for Plaintiff

GMAC MORTGAGE CORPORATION

: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS
: CIVIL DIVISION

vs.

: NO. 01-1099-CD

HEATHER L. MERCURIO

VERIFICATION OF NON-MILITARY SERVICE

FRANK FEDERMAN, ESQUIRE, hereby verifies that he is attorney for the 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 HEATHER L. MERCURIO is over 18 years of age and resides at 15965 ARBOR VIEW BOULEVARD #726, NAPLES, FL 34110.

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


FRANK FEDERMAN, ESQUIRE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

GMAC MORTGAGE CORPORATION

Plaintiff

vs.

HEATHER L. MERCURIO

Defendants

)
) NO. 01-1099-CD

)
)

Notice is given that a Judgment in the above-captioned matter has been entered against you on October 16, 2001.

By:  DEPUTY

If you have any questions concerning this matter, please contact:

FRANK FEDERMAN, ESQUIRE

Attorney for Party Filing
One Penn Center at Suburban
Station, Suite 1400
Philadelphia, PA 19103
(215) 563-7000

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.

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

COPY

GMAC Mortgage Corporation
Plaintiff(s)

No.: 2001-01099-CD

Real Debt: \$56,319.22

Atty's Comm:

Vs.

Costs: \$

Int. From:

Heather L. Mercurio
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 16, 2001

Expires: October 16, 2006

16

Certified from the record this 16th of October, 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

FILED

OCT 16 2001

M 12:05 PM
William A. Shaw
Prothonotary

PD \$20.00

not to Dy.
Statement to atty

PRAECIPE FOR WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)

P.R.C.P. 3180-3183

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE, PO BOX
780
WATERLOO, IA 50704

: CLEARFIELD
:
: COURT OF COMMON
: PLEAS
:
: CIVIL DIVISION
:
: NO. 01-1099-CD
:
:
:
:
:
:

Plaintiff

vs.

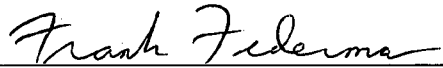
HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD
#726
NAPLES, FL 34110

Defendant(s)

TO THE DIRECTOR OF THE PROTHONOTARY:

Issue writ of execution in the above matter:

Amount Due \$ 56,319.22
Interest from \$ 120.00 and Costs
OCTOBER 9, 2001 to (sale date)
(per diem - \$9.26)


FRANK FEDERMAN, ESQUIRE
ONE PENN CENTER AT SUBURBAN STATION
SUITE 1400
PHILADELPHIA, PA 19103
Attorney for Plaintiff

Note: Please attach description of property.

FILED

OCT 1 6 2001

William A. Shaw
Prothonotary

No. 01-1099-CD Term
IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

GMAC MORTGAGE CORPORATION

vs.

HEATHER L. MERCURIO

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed:

Frank Federman
Attorney for Plaintiff

Address: 15965 ARBOR VIEW BOULEVARD #726, NAPLES, FL 34110
Where papers may be served.

ALL THAT CERTAIN piece or parcel of land situate, lying and being in the City of DeBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a post at a corner formed by the intersection of the Southwesterly line of an alley (first alley Southwesterly from Olivé Avenue) and the Northwesterly line of Pifer Street; thence South 31° West by line of said Pifer Street, 30 feet 6 inches to a post at corner of lot now or formerly of A. J. McElroy; thence Westerly by line of said McElroy lot, 150 feet to a post at an alley; thence in a Northerly direction by line of said alley, 50 feet to a post at the first mentioned alley; thence South $41^{\circ} 15''$ East by line of said alley, 150 feet, more or less, to a post at Pifer Street, the place of beginning. Being known as Lot No. 115 and the Northerly part of Lot No. 116 as per M. S. Knarr's Addition to DuBois, Pennsylvania, which said plat is recorded at Clearfield, Pennsylvania in Miscellaneous Book V, Page 278.

TAX PARCEL #003-000-00768

TITLE TO SAID PREMISES IS VESTED IN Heather L. Mercurio by Deed from John R. Bross, and Kathleen A. Bross, husband and wife dated 8/1/1994, recorded 8/15/1994, in Deed Book Volume 1625, Page 288.

FILED

OCT 18 2001
MIA 351 City Federman
William A. Shaw
Prothonotary

DD \$20.00

Re: Curtis Street

WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)
P.R.C.P. 3180 TO 3183 AND Rule 3257

COPY

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE, PO BOX
780
WATERLOO, IA 50704

Plaintiff

vs.

HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD
#726
NAPLES, FL 34110

Defendant(s)

: CLEARFIELD
:
: COURT OF COMMON
: PLEAS
:
: CIVIL DIVISION
:
: NO. 01-1099-CD
:
:
:
:
:
:

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF CLEARFIELD:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs in the above matter, you are directed to levy upon and sell the following described property (specifically described property below):

Premises 310 PIFER STREET, DUBOIS, PA 15801
(see attached legal description)

Amount Due \$ 56,319.22

Interest from \$ _____
OCTOBER 9, 2001 to (sale date)
(per diem - \$9.26)

Total \$ 120.00 Plus Costs as endorsed.



Clerk
Office of Prothonotary
Common Pleas Court of
CLEARFIELD County, PA

Dated: 10-11-01
(Seal)

No. 01-1099-CD Term

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

GMAC MORTGAGE CORPORATION

vs.

HEATHER L. MERCURIO

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Office of the Prothonotary

Judg. Fee

Cr.

Sat.

Frank Federman
Attorney for Plaintiff

Address: 15965 ARBOR VIEW BOULEVARD #726, NAPLES, FL 34110
Where papers may be served.

ALL THAT CERTAIN piece or parcel of land situate, lying and being in the City of DeBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a post at a corner formed by the intersection of the Southwesterly line of an alley (first alley Southwesterly from Olive Avenue) and the Northwesterly line of Pifer Street; thence South 31° West by line of said Pifer Street, 30 feet 6 inches to a post at corner of lot now or formerly of A. J. McElroy; thence Westerly by line of said McElroy lot, 150 feet to a post at an alley; thence in a Northerly direction by line of said alley, 50 feet to a post at the first mentioned alley; thence South $41^{\circ} 15'$ East by line of said alley, 150 feet, more or less, to a post at Pifer Street, the place of beginning. Being known as Lot No. 115 and the Northerly part of Lot No. 116 as per M. S. Knarr's Addition to DuBois, Pennsylvania, which said plat is recorded at Clearfield, Pennsylvania in Miscellaneous Book V, Page 278.

TAX PARCEL #003-000-00768

TITLE TO SAID PREMISES IS VESTED IN Heather L. Mercurio by Deed from John R. Bross, and Kathleen A. Bross, husband and wife dated 8/1/1994, recorded 8/15/1994, in Deed Book Volume 1625, Page 288.

WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)
P.R.C.P. 3180 TO 3183 AND Rule 3257

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE, PO BOX
780
WATERLOO, IA 50704
Plaintiff

vs.

HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD
#726
NAPLES, FL 34110
Defendant(s)

: CLEARFIELD
:
: COURT OF COMMON
: PLEAS
:
: CIVIL DIVISION
:
: NO. 01-1099-CD
:
:
:
:
:

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF CLEARFIELD:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs in the above matter, you are directed to levy upon and sell the following described property (specifically described property below):

Premises 310 PIFER STREET, DUBOIS, PA 15801
(see attached legal description)

Amount Due \$ 56,319.22

Interest from \$ _____
OCTOBER 9, 2001 to (sale date)
(per diem - \$9.26)

Total \$ 120.00 Plus Costs as endorsed.

RECEIVED OCT 16 2001

@ 3:26 PM

Chester A. Hawkins
by *Margaret H. Pott*



Clerk
Office of Prothonotary
Common Pleas Court of
CLEARFIELD County, PA

Dated: 10.16.01
(Seal)

No. 01-1099-CD Term

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

GMAC MORTGAGE CORPORATION

vs.

HEATHER L. MERCURIO

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Office of the Prothonotary

Judg. Fee

Cr.

Sat.

Frank Federman
Attorney for Plaintiff

Address: 15965 ARBOR VIEW BOULEVARD #726, NAPLES, FL 34110
Where papers may be served.

ALL THAT CERTAIN piece or parcel of land situate, lying and being in the City of DeBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

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TAX PARCEL #003-000-00768

TITLE TO SAID PREMISES IS VESTED IN Heather L. Mercurio by Deed from John R. Bross, and Kathleen A. Bross, husband and wife dated 8/1/1994, recorded 8/15/1994, in Deed Book Volume 1625, Page 288.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11665

GMAC MORTGAGE CORPORATION

01-1099-CD

VS.

MERCURIO, HEATHER L.

WRIT OF EXECUTION

REAL ESTATE

SHERIFF RETURNS

NOW, OCTOBER 31, 2001, RECEIVED A FAX FROM GREG WILKINS, ATTORNEY FOR THE PLAINTIFF, THAT DEFENDANTS HAVE FILED BANKRUPTCY, NO SALE DATE IS TO BE SET.

NOW, NOVEMBER 5, 2001, RETURN WRIT AS NO SALE HELD AS DEFENDANTS HAVE FILED BANKRUPTCY. PAID COSTS FROM ADVANCE AND MADE REFUND OF UNUSED ADVANCE TO THE ATTORNEY.

SHERIFF HAWKINS \$15.34

SURCHARGE \$20.00

PAID BY PLAINTIFF

FILED

NOV 05 2001

01:30
William A. Shaw
Prothonotary

Sworn to Before Me This

5th Day Of November 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
by Margaret W. Pitt
Chester A. Hawkins
Sheriff
E/24

REAL ESTATE SALE SCHEDULE OF DISTRIBUTION

NOW, _____, 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 for the date, time and place of sale at the Court House in Clearfield on the _____ day of _____ 2001, I exposed the within described real estate of

to public venue or outcry at which time and place I sold the same to _____ he/she being the highest bidder, for the sum of \$ _____ and made the following appropriations, viz.:

SHERIFF COSTS:

RDR	\$ 15.00
SERVICE	15.00
MILEAGE	12.35
LEVY	15.00
MILEAGE	12.35
POSTING	15.00

CSDS	10.00
COMMISSION 2%	
POSTAGE	.34
HANDBILLS	4.08
DISTRIBUTION	15.00
ADVERTISING	25.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	1
ADD'L LEVY	
BID AMOUNT	
RETURNS/DEPUTIZE	
COPIES / BILLING	15.00
BILLING - PHONE - FAX	

TOTAL SHERIFF COSTS \$

DEED COSTS:

REGISTER & RECORDER	\$ 15.50
ACKNOWLEDGEMENT	**** 5.00
TRANSFER TAX 2%	

TOTAL DEED COSTS \$

DEBT & INTEREST:

DEBT-AMOUNT DUE	\$ 56,319.22
INTEREST FROM 10-9-01 TO SALE DATE	
@\$9.26	TO BE ADDED

TOTAL DEBT & INTEREST \$56,319.22

COSTS:

ATTORNEY FEES	
PROTH. SATISFACTION	
ADVERTISING	
LATE CHARGES & FEES	\$
TAXES-Collector	
TAXES-Tax Claim	
COSTS OF SUIT-To Be Added	\$
LIST OF LIENS AND MORTGAGE SEARCH	
FORCLOSURE FEES /ESCROW DEFICIT	\$
ACKNOWLEDGEMENT	
DEED COSTS	
ATTORNEY COMMISSION	\$
SHERIFF COSTS	\$ 15.34
LEGAL JOURNAL AD	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	
PROTHONOTARY	\$ 120.00

TOTAL COSTS \$

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

Chester A. Hawkins, Sheriff

FEDERMAN AND PHELAN
By: FRANK FEDERMAN
IDENTIFICATION NO. 12248
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

GMAC MORTGAGE CORPORATION

Plaintiff

vs.

HEATHER L. MERCURIO

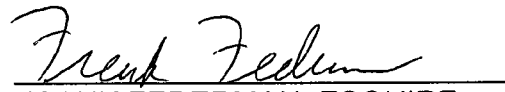
Defendant(s)

: CLEARFIELD County
:
: Court of Common Pleas
:
: CIVIL DIVISION
:
: NO. 01-1099-CD
:
:
:

PRAECIPE TO VACATE JUDGMENT
WITHOUT PREJUDICE


TO THE PROTHONOTARY:

Kindly vacate the Judgment which was entered on OCTOBER 9, 2001
against HEATHER L. MERCURIO , Defendants, in the amount of \$56,319.22 relative
to the instant matter, without prejudice, upon payment of your costs only.


FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

Dated: MARCH 12, 2002

FILED

MAR 14 2002
m/8'59/no cc atty Federman
William A. Shaw
Prothonotary  pd \$ 100

PRAECIPE FOR WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)

P.R.C.P. 3180-3183

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE, P.O. BOX
780
WATERLOO, IA 50704

: CLEARFIELD COUNTY
:
: COURT OF COMMON
: PLEAS

Plaintiff

: CIVIL DIVISION

vs.

: NO. 01-1099-CD

HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD
#726
NAPLES, FL 34110

:
:
:
:
:
:
:


Defendant(s)

TO THE DIRECTOR OF THE PROTHONOTARY:

Issue writ of execution in the above matter:

Amount Due \$ 103,954.12

Interest from \$ _____ and Costs
3/16/02 TO (sale date)
(per diem - \$17.09)


FRANK FEDERMAN, ESQUIRE
ONE PENN CENTER AT SUBURBAN STATION
SUITE 1400
PHILADELPHIA, PA 19103
Attorney for Plaintiff

Note: Please attach description of property.

FILED

MAR 19 2002

set on
m. 1350/atty Federman
William A. Shaw
Prothonotary
pd \$20.00
6 w/atty

No. 01-1099-CD Term
IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA


GMAC MORTGAGE CORPORATION

vs.

HEATHER L. MERCURIO

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed:


Attorney for Plaintiff

Address: 15965 ARBOR VIEW BOULEVARD #726
NAPLES, FL 34110

Where papers may be served.

ALL THAT CERTAIN piece or parcel of land situate, lying and being in the City of DeBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a post at a corner formed by the intersection of the Southwesterly line of an alley (first alley Southwesterly from Olivé Avenue) and the Northwesterly line of Pifer Street; thence South 31° West by line of said Pifer Street, 30 feet 6 inches to a post at corner of lot now or formerly of A. J. McElroy; thence Westerly by line of said McElroy lot, 150 feet to a post at an alley; thence in a Northerly direction by line of said alley, 50 feet to a post at the first mentioned alley; thence South $41^{\circ} 15''$ East by line of said alley, 150 feet, more or less, to a post at Pifer Street, the place of beginning. Being known as Lot No. 115 and the Northerly part of Lot No. 116 as per M. S. Knarr's Addition to DuBois, Pennsylvania, which said plat is recorded at Clearfield, Pennsylvania in Miscellaneous Book V, Page 278.

TAX PARCEL #003-000-00768

TITLE TO SAID PREMISES IS VESTED IN Heather L. Mercurio by Deed from John R. Bross, and Kathleen A. Bross, husband and wife dated 8/1/1994, recorded 8/15/1994, in Deed Book Volume 1625, Page 288.

WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)
P.R.C.P. 3180 TO 3183 AND Rule 3257

COPY

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE, P.O. BOX
780
WATERLOO, IA 50704
Plaintiff

vs.

HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD
#726
NAPLES, FL 34110
Defendant(s)

: CLEARFIELD COUNTY
:
: COURT OF COMMON
: PLEAS
:
: CIVIL DIVISION
:
: NO. 01-1099-CD
:
:
:
:
:

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF CLEARFIELD:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs in the above matter, you are directed to levy upon and sell the following described property (specifically described property below):


Premises: 310 PIFER STREET, DUBOIS, PA 15801
(see attached legal description)

Amount Due \$ 103,954.12

Interest from \$ _____
3/16/02 TO (sale date)
(per diem - \$17.09)

Total \$ _____ Plus Costs as endorsed

Prothonotary costs: \$ 231.49


Clerk
Office of Prothonotary
Common Pleas Court of
CLEARFIELD County, PA

Dated: 3/19/02
(Seal)

No. 01-1099-CD Term

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

GMAC MORTGAGE CORPORATION

vs.

HEATHER L. MERCURIO

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Office of the Prothonotary

Judg. Fee

Cr.

Sat.



Attorney for Plaintiff

Address:

15965 ARBOR VIEW BOULEVARD #726
NAPLES, FL 34110

Where papers may be served.

ALL THAT CERTAIN piece or parcel of land situate, lying and being in the City of DeBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a post at a corner formed by the intersection of the Southwesterly line of an alley (first alley Southwesterly from Olivé Avenue) and the Northwesterly line of Pifer Street; thence South 31° West by line of said Pifer Street, 30 feet 6 inches to a post at corner of lot now or formerly of A. J. McElroy; thence Westerly by line of said McElroy lot, 150 feet to a post at an alley; thence in a Northerly direction by line of said alley, 50 feet to a post at the first mentioned alley; thence South $41^{\circ} 15''$ East by line of said alley, 150 feet, more or less, to a post at Pifer Street, the place of beginning. Being known as Lot No. 115 and the Northerly part of Lot No. 116 as per M. S. Knarr's Addition to DuBois, Pennsylvania, which said plat is recorded at Clearfield, Pennsylvania in Miscellaneous Book V, Page 278.

TAX PARCEL #003-000-00768

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FEDERMAN AND PHELAN
By: FRANK FEDERMAN
Identification No. 12248
One Penn Center at Suburban
Station, Suite 1400
Philadelphia, PA 19103
(215) 563-7000

Attorney for Plaintiff

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE, P.O. BOX 780
WATERLOO, IA 50704

: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS

vs.

: CIVIL DIVISION

HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD #726
NAPLES, FL 34110

: NO. 01-1099-CD

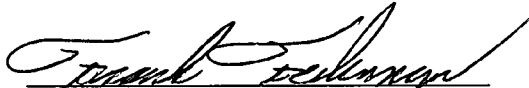
**PRAECIPE FOR JUDGMENT FOR FAILURE TO
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against HEATHER L. MERCURIO, Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:


As set forth in Complaint	\$102,263.96
Interest - 1/1/02 TO 3/15/02	<u>\$ 1,690.16</u>
TOTAL	\$103,954.12

I hereby certify that (1) the addresses of the Plaintiff and Defendant(s) are as shown above, and (2) that notice has been given in accordance with Rule 237.1, copy attached.


FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 3.19.02


PRO PROTHY

FILED

MAR 19 2002

10/3.20/atty Federman
William A. Shaw
Prothonotary

pd \$20.00

not to be
std. to atty.

FEDERMAN AND PHELAN

BY: FRANK FEDERMAN, ESQUIRE

Attorney for Plaintiff

Identification No. 12248

1617 John F. Kennedy Boulevard Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

GMAC MORTGAGE CORPORATION

: COURT OF COMMON PLEAS

Plaintiff

: CIVIL DIVISION

vs.

: CLEARFIELD COUNTY

HEATHER L. MERCURIO

: NO. 01-1099-CD

Defendant(s)

TO: HEATHER L. MERCURIO

15965 ARBOR VIEW BOULEVARD, #726

NAPLES, FL 34110

DATE OF NOTICE: SEPTEMBER 18, 2001

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

IMPORTANT NOTICE

You are in default because you have failed 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:

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

Frank Federman, Esquire
Attorney for Plaintiff

FEDERMAN AND PHELAN
By: FRANK FEDERMAN
Identification No. 12248
One Penn Center at Suburban
Station, Suite 1400
Philadelphia, PA 19103
(215) 563-7000

Attorney for Plaintiff

GMAC MORTGAGE CORPORATION

: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS
: CIVIL DIVISION

vs.

: NO. 01-1099-CD

HEATHER L. MERCURIO

VERIFICATION OF NON-MILITARY SERVICE

FRANK FEDERMAN, ESQUIRE, hereby verifies that he is attorney for the 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 HEATHER L. MERCURIO is over 18 years of age and resides at 15965 ARBOR VIEW BOULEVARD #726, NAPLES, FL 34110.

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


FRANK FEDERMAN, ESQUIRE

COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

GMAC MORTGAGE CORPORATION

Plaintiff

vs.

HEATHER L. MERCURIO

Defendants

)
) NO. 01-1099-CD

)
)

Notice is given that a Judgment in the above-captioned
matter has been entered against you on March 19, 2002.

By: Willi L. L. L. DEPUTY

If you have any questions concerning this matter,
please contact:

FRANK FEDERMAN, ESQUIRE

Attorney for Party Filing
One Penn Center at Suburban
Station, Suite 1400
Philadelphia, PA 19103
(215) 563-7000

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A
DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT
PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE
IN BANKRUPTCY, THIS IS NOT AND SHOULD NOT BE CONSTRUED
TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY
ENFORCEMENT OF A LIEN AGAINST PROPERTY.

COPY

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

GMAC Mortgage Corporation
Plaintiff(s)

No.: 2001-01099-CD

Real Debt: \$103,954.12

Atty's Comm:

Vs.

Costs: \$

Int. From:

Heather L. Mercurio
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: March 19, 2002

Expires: March 19, 2007

Certified from the record this 19th of March, 2002

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

FEDERMAN AND PHELAN, L.L.P.
By: Frank Federman, Esquire
Identification No. 12248
Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103

Attorney for Plaintiff

GMAC MORTGAGE CORPORATION

v.

COURT NO.:01-1099 CD
COUNTY OF CLEARFIELD

HEATHER L. MERCURIO

**WAIVER OF INTEREST IN MORTGAGED PREMISES
BY RESIDENTIAL LESSEE WITH OPTION TO PURCHASE**

In consideration for not being named as Defendants in the captioned foreclosure action, the undersigned, RICK P. BUZARD and SHERRY M. BUZARD, hereby waive any and all interest they may have in the premises located at 310 PIFER STREET, DUBOIS, PA 15801, by virtue of that certain Residential Lease with Option to Purchase dated August 9, 2000 and recorded August 30, 2000 in the office of the Recorder of Clearfield County, at No. 200012661, and hereby consent to legal action without any further notice of Sheriff's sale.

It is expressly agreed that their interest in the premises shall be divested at Sheriff's sale.

Date: 3-7-02

Rick P. Buzard
Rick P. Buzard

Date: 3-7-02

Sherry M. Buzard
Sherry M. Buzard

* This firm is a debt collector. Any information we receive will be used for that purpose.

FILED

MAR 10 2002

William A. Shaw
William A. Shaw
Prothonotary

FEDERMAN AND PHELAN
By: FRANK FEDERMAN, ESQUIRE
IDENTIFICATION NO. 12248
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION

GMAC MORTGAGE CORPORATION

CLEARFIELD COUNTY

vs.

No.: 01-1099-CD

HEATHER L. MERCURIO


**MOTION FOR SERVICE PURSUANT TO
SPECIAL ORDER OF COURT**

Plaintiff, by its counsel, Frank Federman, Esquire, moves this Honorable Court for an Order directing service of the Notice of Sale upon the above captioned Defendant(s) by certified mail and regular mail to Defendant's last known address.

1. Attempts to serve Defendant with Notice of Sale have been unsuccessful, as indicated by the Affidavit of Service attached hereto as Exhibit "A."

2. Pursuant to Pennsylvania Rule of Civil Procedure 430, Plaintiff has made a good faith effort to locate the Defendant. An Affidavit of Good Faith Investigation setting forth the specific inquiries made and the result there from is attached hereto as Exhibit "B."

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter an Order pursuant to Pennsylvania Rule of Civil Procedure 430 directing service of the Notice of Sale by certified mail and regular mail to Defendant's last known address.


FRANK FEDERMAN, ESQUIRE
ATTORNEY FOR PLAINTIFF

FILED

JUN 06 2002

William A. Shaw
Prothonotary

FEDERMAN AND PHELAN
By: FRANK FEDERMAN, ESQUIRE
IDENTIFICATION NO. 12248
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

GMAC MORTGAGE CORPORATION

vs.

HEATHER L. MERCURIO

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION
CLEARFIELD COUNTY

No.: 01-1099-CD

MEMORANDUM OF LAW

Pennsylvania Rule of Civil Procedure 430(a) specifically provides:

(a) If service cannot be made under the applicable rule, the plaintiff may move the Court for a special order directing the method of service. The Motion shall be accompanied by an Affidavit stating the nature and extent of the investigation which has been made to determine the whereabouts of the Defendant and the reasons why service cannot be made.

Note: A Sheriff's return of "Not Found" or the fact that a Defendant has moved without leaving a new forwarding address is insufficient evidence of concealment. Gonzales vs. Polis, 238 Pa. Super. 362, 357 A.2d 580 (1976). "Notice of intended adoption mailed to last known address requires a good faith effort to discover the correct address." Adoption of Walker, 468 Pa. 165, 360 A.2d 603 (1976).

An illustration of good faith effort to locate the defendant includes (1) inquiries of postal authorities including inquiries pursuant to the Freedom of Information Act, 39 C.F.R. Part 265, (2) inquiries of relatives neighbors, friends and employers of the Defendant and (3) examinations of local telephone directories, voter registration records, local tax records, and motor vehicle records.

As indicated by the attached Affidavit of Service, marked hereto as Exhibit "A", the Sheriff has been unable to serve the Notice of Sale. A good faith effort to discover the

whereabouts of the Defendant has been made as evidenced by the attached Affidavit of Good Faith Investigation, marked Exhibit "B."

WHEREFORE, Plaintiff respectfully requests service of the Notice of Sale by certified mail and regular mail to Defendant's last known address.

Respectfully submitted:

A handwritten signature in cursive script, appearing to read "Frank Federman", written over a horizontal line.

FRANK FEDERMAN, ESQUIRE
ATTORNEY FOR PLAINTIFF

AFFIDAVIT OF SERVICE

Commonwealth of Pennsylvania

County of Clearfield

Common Pleas Court

Case Number: 01-1099-CD

Court Date: 6/7/2002

Plaintiff:

GMAC MORTGAGE CORPORATION

vs.

Defendant:

HEATHER L. MERCURIO

EXHIBIT A

For:

Frank Federman, Esq
FEDERMAN AND PHELAN
One Penn Center Plaza
1617 Jfk Blvd, Ste 1400
Philadelphia PA 19103

Received by SHERMAN & ASSOCIATES, INC. on the 5th day of April, 2002 at 10:12 am to be served on
HEATHER L. MERCURIO, 15965 Arbor View Boulevard #726, Naples, FL 34110.

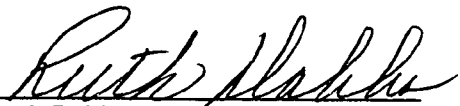
I, Ruth Dabbs, being duly sworn, depose and say that on the **18th day of April, 2002 at 9:00 am, I:**

NON SERVED the **NOTICE OF SHERIFF'S SALE OF REAL ESTATE** at the request of the client. See
comments below.

Comments pertaining to this Service:

Information was developed that Heather L. Mercurio skipped out owing rent to Arbor View Apartments on
05/15/01.

I certify that I am over the age of 18, have no interest in the above action and that I am authorized by Florida
Statute to serve this process.


Ruth Dabbs

Subscribed and Sworn to before me on the 23rd
day of April, 2002 by the affiant who is personally
known to me.


NOTARY PUBLIC



SHERMAN & ASSOCIATES, INC.
Post Office Box 1300
Fort Myers, FL 33902-1300
(941) 437-9600

Our Job Serial Number: 2002000879

EXHIBIT D

SKN Data Research Inc.
AFFIDAVIT OF GOOD FAITH INVESTIGATION

File Number: **2-1888PA**

Attorney Firm: **Federman & Phelan**

Subject: **Heather L. Mercurio**

Current Address: 15965 Arbor View Blvd #726 Naples, FL 34110

Property Address: 310 Pifer St. Dubois, PA 15801

Mailing Address: 15965 Arbor View Blvd #726 Naples, FL 34110

I Scott Nulty, being duly sworn according to law, do hereby depose and state as follows, I have conducted an investigation into the whereabouts of the above-noted individual(s) and have discovered the following:

I. CREDIT INFORMATION

A. SOCIAL SECURITY NUMBER

Heather L. Mercurio - 042-62-8730

B. EMPLOYMENT SEARCH

Heather L. Mercurio - unknown

C. INQUIRY OF CREDITORS

**The creditors indicate that Heather L. Mercurio reside(s) at:
15965 Arbor View Blvd #726 Naples, FL 34110**

II. INQUIRY OF TELEPHONE COMPANY

A. DIRECTORY ASSISTANCE SEARCH

**Indicated that Heather L. Mercurio reside(s) at:
15965 Arbor View Blvd #726 Naples, FL 34110 - 814-371-1673**

III. INQUIRY OF NEIGHBORS

**J. Hubba 312 Pifer St. and he verified that Heather L. Mercurio
reside(s) at: 15965 Arbor View Blvd #726 Naples, FL 34110**

IV. INQUIRY OF POST OFFICE

A. NATIONAL ADDRESS UPDATE

Heather L. Mercurio - 15965 Arbor View Blvd #726 Naples, FL 34110

V. MOTOR VEHICLE REGISTRATION

A. MOTOR VEHICLE & DMV OFFICE

**Per the Department of Motor Vehicle Heather L. Mercurio reside(s) at:
15965 Arbor View Blvd #726 Naples, FL 34110**

VI. OTHER INQUIRIES

A. DEATH RECORDS

As of April 1, 2002 Vital Records has no death record on file for Heather L. Mercurio.

B. PUBLIC LICENSES (PILOT, REAL ESTATE, ETC.)

none

EXHIBIT D

EXHIBIT B

C. COUNTY VOTER REGISTRATION

The Clearfield County Voter registration has no registration for Heather L. Mercurio residing at: 15965 Arbor View Blvd #726 Naples, FL 34110

VII. ADDITIONAL INFORMATION OF SUBJECT

A. DATE OF BIRTH

Heather L. Mercurio - YOB 1962

B. A.K.A.

none

The undersigned understands that this statement herein is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

I hereby verify that the statements made herein are true and correct to the best of my knowledge, information and belief and that this affidavit of investigation is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

Scott K. Nulty

AFFIANT Scott Nulty
SKN Data Research Inc. President

EXHIBIT B

Sworn to and subscribed before me this 28th day of May 2002

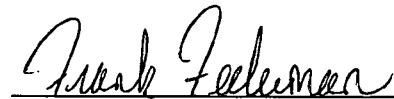
Margaret E. Nulty
NOTARY PUBLIC

Notarial Seal
Margaret E. Nulty, Notary Public
East Goshen Twp., Chester County
My Commission Expires Dec. 19, 2005
Member, Pennsylvania Association Of Notaries

VERIFICATION

FRANK FEDERMAN, ESQUIRE, hereby states that he is the Attorney for the Plaintiff in this action, that he is authorized to take this Affidavit, and that the statements made in the foregoing **MOTION FOR SERVICE OF THE NOTICE OF SALE PURSUANT TO SPECIAL ORDER OF COURT** are true and correct to the best of his knowledge, information and belief.

The undersigned understands that this statement herein 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

FEDERMAN AND PHELAN
By: FRANK FEDERMAN, ESQUIRE
IDENTIFICATION NO. 12248
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION

GMAC MORTGAGE CORPORATION

CLEARFIELD COUNTY

vs.


No.: 01-1099-CD

HEATHER L. MERCURIO

CERTIFICATION OF SERVICE

I, FRANK FEDERMAN, ESQUIRE, hereby certify that a copy of the Motion for Service
Pursuant to Special Order of Court has been sent to the individuals indicated below on
June 5, 2002.

HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD #726
NAPLES, FL 34110


FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

Date: June 5, 2002

FEDERMAN AND PHELAN
By: FRANK FEDERMAN, ESQUIRE
IDENTIFICATION NO. 12248
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION

GMAC MORTGAGE CORPORATION

CLEARFIELD COUNTY

vs.

No.: 01-1099-CD

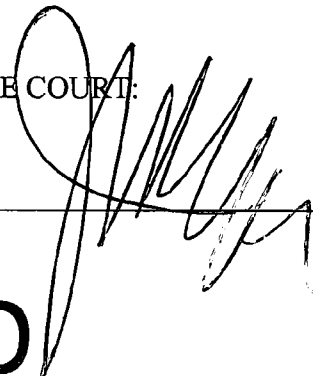
HEATHER L. MERCURIO

ORDER

AND NOW, this 6th day of June, 2002, upon consideration of Plaintiff's Motion and the Affidavit of Good Faith Investigation attached thereto, it is hereby **ORDERED** that Plaintiff may obtain service of the Notice of Sale on the above captioned Defendant(s), HEATHER L. MERCURIO, by mailing a true and correct copy of the Notice of Sale by certified mail and regular mail to Defendant's last known address and by posting the mortgaged premises.

Service of the aforementioned mailings 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 of service.

BY THE COURT:



J.

FILED

JUN 07 2002

0/10:24
William A. Shaw
Prothonotary

2 cns TO ATT



FEDERMAN AND PHELAN
BY: FRANK FEDERMAN
IDENTIFICATION NO. 12248
SUITE 1400 - ONE PENN CENTER
PHILADELPHIA, PA 19103
215) 563-7000

ATTORNEY FOR PLAINTIFF

GMAC MORTGAGE CORPORATION
vs.

CLEARFIELD COUNTY
COURT OF COMMON PLEAS
CIVIL DIVISION


HEATHER L. MERCURIO

NO. 01-1099-CD

VERIFICATION

I hereby certify that a true and correct copy of the Notice of Sheriff's Sale in the above captioned matter was sent by regular mail and certified mail, return receipt requested, to the following person(s) HEATHER L. MERCURIO on JUNE 24, 2002 at 310 PIFER STREET, DUBOIS, PA 15801, in accordance with the Order of Court dated, JUNE 6, 2002

The undersigned understands that this statement is made subject to the penalties of 18 PA. C.S. s4904 relating to unsworn falsification to authorities.


FRANK FEDERMAN, ESQUIRE
ATTORNEY FOR PLAINTIFF

DATE: July 15, 2002

FILED

JUL 19 2002
m/gal/no < c
William A. Shaw
Prothonotary

FEDERMAN AND PHELAN
By: FRANK FEDERMAN, ESQUIRE
IDENTIFICATION NO. 12248
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION

GMAC MORTGAGE CORPORATION

CLEARFIELD COUNTY

vs.

No.: 01-1099-CD

HEATHER L. MERCURIO

ORDER

AND NOW, this 6 day of JUNE, 2002, upon consideration of Plaintiff's Motion and the Affidavit of Good Faith Investigation attached thereto, it is hereby **ORDERED** that Plaintiff may obtain service of the Notice of Sale on the above captioned Defendant(s), HEATHER L. MERCURIO, by mailing a true and correct copy of the Notice of Sale by certified mail and regular mail to Defendant's last known address and by posting the mortgaged premises.

Service of the aforementioned mailings 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 of service.

BY THE COURT:

/s/ JOHN K. REILLY, JR.

J.

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

JUN 07 2002

Attest.

William D. Shaw
Prothonotary/
Clerk of Courts

7160 3901 9844 8594 3698

TO: HEATHER MERCURIO
3822 SNOWFLAKE LANE
NAPLES, FL 34110

SENDER: TEAM2

REFERENCE: MERCURIO

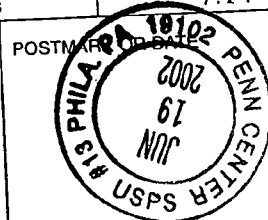
PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	.34
	Certified Fee	2.10
	Return Receipt Fee	1.50
	Restricted Delivery	3.20
	Total Postage & Fees	7.14

US Postal Service

**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do Not Use for International Mail



AFFIDAVIT OF SERVICE

PLAINTIFF **GMAC MORTGAGE CORPORATION**
DEFENDANT (S) **HEATHER L. MERCURIO**
SERVE AT **310 PIPER STREET**
 DUBOIS, PA 15801

Cleefield
ALLEGHENY COUNTY
No. GD 01-1099-CD

Type of Action
- Notice of Sheriff's Sale

Sale Date: AUGUST 2, 2002

→ ****Please post the Property with the Notice of Sale****

SERVED

Served and made known to _____ Defendant, on the 24TH day
of JUNE, 2002 at 6 o'clock p.m. at 310 PIPER STREET DUBOIS, PA 15801

Commonwealth of Pennsylvania, in the manner described below:

____ Defendant personally served.
____ Adult family member with whom Defendant(s) reside(s). Relationship is _____
____ Adult in charge of Defendant(s)'s residence who refused to give name or relationship.
____ Manager/Clerk of place of lodging in which Defendant(s) reside(s).
____ Agent or person in charge of Defendant(s)'s office or usual place of business.
____ an officer of said Defendant(s)'s company.
____ Other: _____

Description: Age _____ Height _____ Weight _____ Race _____ Sex _____ ☒ Other

I, MATTHEW BRENNAN, a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed
before me this 27TH day
of JUNE, 2002

Notary: DEBRA L. GENET

By: M. Brennan

NOT SERVED

*****ATTEMPT SERVICE NLT THREE (3) TIMES*****

On the _____ day of _____, 200__, at _____ o'clock __m., Defendant **NOT FOUND** because:

____ Moved ____ Unknown ____ No Answer ____ Vacant

Other: _____

1st attempt _____, 2nd attempt _____, 3rd attempt _____

Date & Time _____

Date & Time _____

Date & Time _____

Sworn to and subscribed
before me this _____ day
of _____, 200__.

Notary: _____

By: _____

Loan #306641080

Attorney for Plaintiff

Frank Federman, Esquire - I.D. No. 12248

One Penn Center at Suburban Station- Suite 1400
Philadelphia, PA 19103

(215) 563-7080

Notarial Seal
Debra L. Genet, Notary Public
College Twp., Centre County
My Commission Expires Oct. 24, 2005

FILED

JUL 19 2002

W.A. Shaw
M/2431 noc
William A. Shaw
Prothonotary

FEDERMAN AND PHELAN
ATTORNEY FILE COPY
PLEASE RETURN

AFFIDAVIT OF SERVICE

PLAINTIFF GMAC MORTGAGE CORPORATION
DEFENDANT (S) HEATHER L. MERCURIO
SERVE AT 310 PIPER STREET
DUBOIS, PA 15801

ALLEGHENY COUNTY
No. GD 01-1099-CD

Type of Action
- Notice of Sheriff's Sale

Sale Date: AUGUST 2, 2002

→ **Please post the Property with the Notice of Sale**

SERVED

Served and made known to _____, Defendant, on the 24TH day
of JUNE, 2002 at 6, o'clock p.m., at 310 PIPER STREET DUBOIS, PA 15801

Commonwealth of Pennsylvania, in the manner described below:

- _____ Defendant personally served.
- _____ Adult family member with whom Defendant(s) reside(s). Relationship is _____
- _____ Adult in charge of Defendant(s)'s residence who refused to give name or relationship.
- _____ Manager/Clerk of place of lodging in which Defendant(s) reside(s).
- _____ Agent or person in charge of Defendant(s)'s office or usual place of business.
- _____ an officer of said Defendant(s)'s company.
- _____ Other: _____

Description: Age _____ Height _____ Weight _____ Race _____ Sex ☒ Other

I, MATTHEW BRENNAN, a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

posted property
as per court
order

Sworn to and subscribed
before me this 24TH day
of JUNE, 2002

Notary: DEBRA L. GENET

By: M. Brennan

NOT SERVED

ATTEMPT SERVICE NLT THREE (3) TIMES

On the _____ day of _____, 200____ at _____ o'clock _____ m., Defendant NOT
FOUND because:

_____ Moved _____ Unknown _____ No Answer _____ Vacant

Other: _____

1st attempt _____, 2nd attempt _____, 3rd attempt _____
Date & Time _____ Date & Time _____ Date & Time _____

Sworn to and subscribed
before me this _____ day
of _____, 200____
Notary: _____

By: _____

Loan #306641080

Attorney for Plaintiff

Frank Federman, Esquire - I.D. No. 12248
One Penn Center at Suburban Station- Suite 1400
Philadelphia, PA 19103
(215) 563-7000

Notarial Seal
Debra L. Genet, Notary Public
College Twp., Centre County
My Commission Expires Oct. 24, 2005

FEDERMAN AND PHELAN
ATTORNEY FILE COPY
PLEASE RETURN

FEDERMAN AND PHELAN
ATTORNEY FILE COPY
PLEASE RETURN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

RE: GMAC MORTGAGE CORPORATION) CIVIL ACTION
)

vs.


HEATHER L. MERCURIO) CIVIL DIVISION
) NO. 01-1099-CD

AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129


COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF CLEARFIELD) SS:

I, FRANK FEDERMAN, ESQUIRE attorney for **GMAC MORTGAGE CORPORATION** hereby verify that on 4/1/02 true and correct copies of the Notice of Sheriff's sale were served by certificate of mailing to the recorded lienholders, and any known interested party see Exhibit "A" attached hereto. Notice of Sale was sent to the Defendant(s) on 4/1/02, 6/12/02, 6/14/02 & 6/19/02 by certified mail return receipt requested see Exhibit "B" attached hereto.

DATE: August 1, 2002


FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

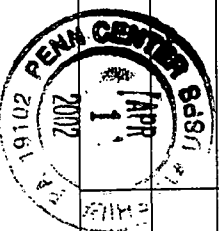
FILED

AUG 08 2002
m/1:31/nbcc
William A. Shaw
Prothonotary 

Name and
Address
of Sender

FEDERMAN & PHELAN
ONE PENN CENTER, SUBURBAN STATION, SUITE 1400
PHILADELPHIA, PA 19102

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee
1	GMW	TENANT/OCCUPANT 310 PIFER STREET DUBOIS, PA 15801		
2		COMMONWEALTH OF PA DEPT OF WELFARE P.O. BOX 2675, HARRISBURG, PA 17105		
3		CLEARFIELD COUNTY DOMESTIC RELATIONS DEPARTMENT CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830		
4				
5				
6				
7				
8				
9				
10				
11		MERCURIO		
Total Number of Pieces Listed by Sender 3		Postmaster, Per (Name of Receiving Employee)		
TEAM 2				



7260 3901 9844 8597 2421

TO: HEATHER L. MERCURIO
15965 ARBOR VIEW BLVD.
#726
NAPLES, FL 34110

SENDER: TEAM2

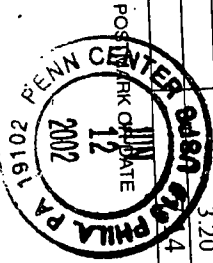
REFERENCE: MERCURIO

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	34
	Certified Fee	2.10
	Return Receipt Fee	1.50
	Restricted Delivery	3.20
	Total Postage & Fees	4

US Postal Service
Receipt for
Certified Mail

No Insurance Coverage Provided
Do Not Use for International Mail



7260 3901 9844 7040 6214

TO: HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD
#726
NAPLES, FL 34110

SENDER: TEAM2

REFERENCE: MERCURIO

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	34
	Certified Fee	2.10
	Return Receipt Fee	1.50
	Restricted Delivery	3.20
	Total Postage & Fees	7.14

US Postal Service
Receipt for
Certified Mail

No Insurance Coverage Provided
Do Not Use for International Mail



7160 3901 9844 8594 3698

TO: HEATHER MERCURIO
3822 SNOWFLAKE LANE
NAPLES, FL 34110

SENDER: TEAM2

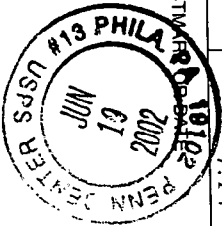
REFERENCE: MERCURIO

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	.34
	Certified Fee	2.10
	Return Receipt Fee	1.50
	Restricted Delivery	3.20
	Total Postage & Fees	7.14

US Postal Service
Receipt for
Certified Mail

No Insurance Coverage Provided
Do Not Use for International Mail



7160 3901 9844 8594 3681

TO: HEATHER MERCURIO
310 PIFER STREET
DUBOIS, PA 15801

SENDER: TEAM2

REFERENCE: MERCURIO

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	.34
	Certified Fee	2.10
	Return Receipt Fee	1.50
	Restricted Delivery	3.20
	Total Postage & Fees	7.14

US Postal Service
Receipt for
Certified Mail

No Insurance Coverage Provided
Do Not Use for International Mail



In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12277

GMAC MORTGAGE CORPORATION

01-1099-CD

VS.

MERCURIO, HEATHER L.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

NOW, MARCH 25, 2002, AT 11:30 AM O'CLOCK A LEVY WAS TAKEN ON PROPERTY OF THE DEFENDANT. PROPERTY WAS POSTED THIS DATE.

A SALE IS SET FOR FRIDAY, JUNE 7, 2002, AT 10:00 AM.

NOW, MARCH 25, 2002, MAILED WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY TO HEATHER L. MERCURIO, DEFENDANT, AT HER PLACE OF RESIDENCE, 15965 ARBOR VIEW BOULEVARD, NAPLES, FLORIDA, 34110, BY REGULAR AND CERTIFIED MAIL #7001 1940 0001 9405 9819.

NOW, JUNE 3, 2002, CALLED CLEARFIELD POST OFFICE FOR A TRACE ON THE CERTIFIED LETTER AS WE HAVE NOT RECEIVED ANY CONFIRMATION ON SERVICE.

NOW, JUNE 3, 2002, PER POST OFFICE THE CERTIFIED IS NOT IN THE SYSTEM. CALLED GREG WILKINS AT FEDERMAN AND PHELAN, ATTORNEY'S FOR THE PLAINTIFF AND INFORMED HIM OF THIS.

NOW, JUNE 5, 2002 RECEIVED FAX FROM PLAINTIFF ATTORNEY TO CONTINUE SALE TO AUGUST 2, 2002.

NOW, AUGUST 2, 2002 A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANT, HEATHER L. MERCURIO. PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR \$1.00 + COSTS.

NOW AUGUST 12, 2002 BILLED ATTORNEY FOR THE AMOUNTS OF COSTS DUE.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket #

12277

GMAC MORTGAGE CORPORATION

01-1099-CD

VS.

MERCURIO, HEATHER L.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

NOW, SEPTEMBER 13, 2002 RECEIVED CHECK FROM ATTORNEY FOR COSTS DUE.

NOW, OCTOBER 18, 2002 PAID COSTS FROM ATTORNEY ADVANCE AND CHECK.

NOW, OCTOBER 25, 2002 RETURNED WRIT AS SALE BEING HELD. PROPERTY
PURCHASED BY THE PLAINTIFF FOR \$1.00 + COSTS.

DEED FILED OCTOBER 25, 2002.

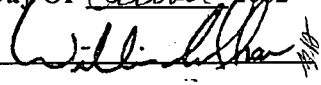
SHERIFF HAWKINS \$214.31

SURCHARGE \$20.00

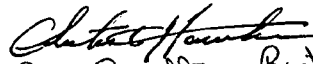
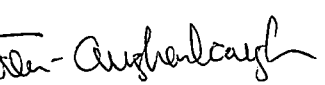
PAID BY ATTORNEY

Sworn to Before Me This

25 Day Of October 2002



So Answers,



Chester A. Hawkins
Sheriff

REAL ESTATE SALE SCHEDULE OF DISTRIBUTION

NAME MERCURIO NO. 01-1099-CD

NOW, August 2, 2002, 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 for the date, time and place of sale at the court House in Clearfield on the 2ND day of AUGUST 2002, I exposed the within described real estate of HEATHER L. MERCURIO to public venue or outcry at which time and place I sold the same to GMAC MORTGAGE CORPORATION he/she being the highest bidder, for the sum of \$1.00 + COSTS and made the following appropriations, viz:

SHERIFF COSTS:

RDR	15.00
SERVICE	15.00
MILEAGE	12.35
LEVY	15.00
MILEAGE	12.35
POSTING	15.00
CSDS	10.00
COMMISSION 2%	
POSTAGE	8.61
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES/BILLING	15.00
	5.00
BILLING/PHONE/FAX	5.00
TOTAL SHERIFF COSTS	214.31

DEED COSTS:

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	18.50
TRANSFER TAX 2%	
TOTAL DEED COSTS	18.50

DEBIT & INTEREST:

DEBT-AMOUNT DUE	103,954.12
INTEREST FROM 3/16/02 TO SALE DATE	
TO BE ADDED PER DIEM & 17.09	
TOTAL DEBT & INTEREST	103,954.12

COSTS:

ATTORNEY FEES	
PROTH. SATISFACTION	
ADVERTISING	628.80
LATE CHARGES & FEES	
TAXES - collector	411.06
TAXES - tax claim	NONE
DUE	
COST OF SUIT -TO BE ADDED	
LEIN SEARCH	100.00
FORCLOSURE FEES/ESCROW DEFICIT	
ACKNOWLEDGEMENT	5.00
DEED COSTS	18.50
ATTORNEY COMMISSION	
SHERIFF COSTS	214.31
LEGAL JOURNAL AD	76.50
REFUND OF ADVANCE	
REFUND OF SURCHARGE	
PROTHONOTARY	231.69
MORTGAGE SEARCH	40.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
MUNICIPAL LIEN	

TOTAL COSTS	1,725.86
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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

WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)
P.R.C.P. 3180 TO 3183 AND Rule 3257

GMAC MORTGAGE CORPORATION
3451 HAMMOND AVENUE, P.O. BOX
780
WATERLOO, IA 50704

Plaintiff

vs.

HEATHER L. MERCURIO
15965 ARBOR VIEW BOULEVARD
#726
NAPLES, FL 34110

Defendant(s)

: CLEARFIELD COUNTY
:
: COURT OF COMMON
: PLEAS
:
: CIVIL DIVISION
:
: NO. 01-1099-CD
:
:
:
:
:

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF CLEARFIELD:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

To satisfy the judgment, interest and costs in the above matter, you are directed to levy upon and sell the following described property (specifically described property below):

Premises: 310 PIFER STREET, DUBOIS, PA 15801
(see attached legal description)

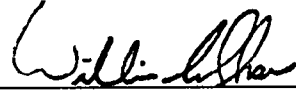
Amount Due \$ 103,954.12

Interest from \$ _____
3/16/02 TO (sale date)
(per diem - \$17.09)

Total \$ _____ Plus Costs as endorsed

Prothonotary Costs:

\$ 231.69


Clerk
Office of Prothonotary
Common Pleas Court of
CLEARFIELD County, PA

Dated: 3-19-02
(Seal)

RECEIVED MAR 19 2002

@ 9:03 AM
Chester A. Hankins
by Margaret H. Pitt

No. 01-1099-CD Term

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

GMAC MORTGAGE CORPORATION

vs.

HEATHER L. MERCURIO

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Office of the Prothonotary

Judg. Fee

Cr.

Sat.


Attorney for Plaintiff

Address:

15965 ARBOR VIEW BOULEVARD #726
NAPLES, FL 34110

Where papers may be served.

ALL THAT CERTAIN piece or parcel of land situate, lying and being in the City of DeBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a post at a corner formed by the intersection of the Southwesterly line of an alley (first alley Southwesterly from Olivé Avenue) and the Northwesterly line of Pifer Street; thence South 31° West by line of said Pifer Street, 30 feet 6 inches to a post at corner of lot now or formerly of A. J. McElroy; thence Westerly by line of said McElroy lot, 150 feet to a post at an alley; thence in a Northerly direction by line of said alley, 50 feet to a post at the first mentioned alley; thence South $41^{\circ} 15''$ East by line of said alley, 150 feet, more or less, to a post at Pifer Street, the place of beginning. Being known as Lot No. 115 and the Northerly part of Lot No. 116 as per M. S. Knarr's Addition to DuBois, Pennsylvania, which said plat is recorded at Clearfield, Pennsylvania in Miscellaneous Book V, Page 278.

TAX PARCEL #003-000-00768

TITLE TO SAID PREMISES IS VESTED IN Heather L. Mercurio by Deed from John R. Bross, and Kathleen A. Bross, husband and wife dated 8/1/1994, recorded 8/15/1994, in Deed Book Volume 1625, Page 288.