

01-1313-CD
WASHINGTON MUTUAL HOME -vs- CHRISTINA H. SHAFER
LOANS, INC.

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

WASHINGTON MUTUAL HOME LOANS, INC.
F/K/A PNC MORTGAGE CORP OF AMERICA
539 SOUTH 4TH STREET
LOUISVILLE, KY 40202

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION

TERM

NO. 2001-1313-C

CLEARFIELD COUNTY

CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
DUBOIS, PA 15801

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

AUG 14 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 THE THIRTY (30) DAY PERIOD THAT BEGINS 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

WASHINGTON MUTUAL HOME LOANS, INC.
F/K/A PNC MORTGAGE CORP OF AMERICA
539 SOUTH 4TH STREET
LOUISVILLE, KY 40202

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

CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
DUBOIS, PA 15801

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

3. On 12/30/98 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to TOWNE AND COUNTRY MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 199900027. By Assignment of Mortgage recorded 1/04/99 the mortgage was assigned to PLAINTIFF which Assignment is recorded in Assignment of Mortgage Instrument No. 199900029.
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 7/1/00 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith. A copy of such notice is attached as Exhibit "A."

6. The following amounts are due on the mortgage:

Principal Balance	\$32,695.97
Interest	2,907.87
6/1/00 through 8/1/01	
(Per Diem \$6.81)	
Attorney's Fees	800.00
Cumulative Late Charges	173.39
12/30/98 to 8/1/01	
Cost of Suit and Title Search	<u>750.00</u>
Subtotal	\$37,127.23
Escrow	
Credit	0.00
Deficit	592.23
Subtotal	<u>\$ 592.23</u>
TOTAL	\$37,719.46

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. The Combined Notice has been sent to the Defendant(s) by regular and certified mail as required by 35 P.S. §1680.403c on the date(s) set forth in the true and correct copy of such notice(s) attached hereto as Exhibit "A."

9. The Temporary Stay as provided by the Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983, has terminated because either:

- (i.) Defendant(s) have failed to meet with the Plaintiff or an authorized Credit Counseling Agency in accordance with Plaintiff's written Notice to Defendants, a true and correct copy of which is attached hereto as Exhibit "A"; or
- (ii.) Defendant(s) application for assistance has been rejected by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$37,719.46, together with interest from 8/1/01 at the rate of \$6.81 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

ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

DATE: May 7, 2001

TO:

Christina H. Shaffer
22 Rumbarger Avenue
Dubois, PA 15801

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 ENFORCEMENT OF A LIEN AGAINST PROPERTY.

This is an official notice that the mortgage on your home is in default and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNERS EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA FERDIDA DEL DERECHO A REDIMAR SU HIPOTECA.

EXHIBIT A

STATEMENTS OF POLICY

HOMEOWNER'S NAME(S): Christina H. Shaffer
PROPERTY ADDRESS: 22 Rumbarger Avenue, Dubois, PA 15801
LOAN ACCT. NO.: 0073823335
ORIGINAL LENDER: Towne & Country Mortgage Corporation
CURRENT LENDER/SERVICER: Washington Mutual Home Loans

HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM **YOU MAY BE ELIGIBLE FOR FINANCIAL ASSISTANCE WHICH CAN SAVE YOUR HOME** **FROM FORECLOSURE AND HELP YOU MAKE FUTURE MORTGAGE PAYMENTS**

IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE.

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.

TEMPORARY STAY OF FORECLOSURE-Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a face-to-face meeting with one of the consumer credit counseling agencies listed at the end of this Notice. THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT" EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.

CONSUMER CREDIT COUNSELING AGENCIES-If you meet with one of the consumer credit counseling agencies listed at the end of this notice the lender may NOT take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face-to-face meeting. Advise your lender immediately of your intentions.

APPLICATION FOR MORTGAGE ASSISTANCE-Your mortgage is in a default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your face-to-face meeting.

YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.

AGENCY ACTION-Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing

Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSE ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT.

(If you have filed bankruptcy you can still apply for Emergency Mortgage Assistance.)

HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).

NATURE OF THE DEFAULT-The MORTGAGE debt held by the above lender on your property located at: **22 Rumbarger Avenue, Dubois, PA 15801** IS SERIOUSLY IN DEFAULT because:

A. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following months and the following amounts are now past due: Start/End: 7/1/00 thru 5/1/01 at \$ 323.99 per month.

Monthly Payments Plus Late Charges Accrued	\$3,685.44
NSF:	\$0.00
Inspections:	\$15.70
Other:	\$0.00
(Suspense):	\$0.00
Total amount to cure default	\$3,701.14

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTIONS (Do not use if not applicable): N/A

HOW TO CURE THE DEFAULT-You may cure the default within THIRTY (30) DAYS of the date of this notice BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS \$3,701.14, PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to: FEDERMAN AND PHELAN, L.L.P., One Penn Center at Suburban Station, Suite 1400, 1617 John F. Kennedy Boulevard, Philadelphia, PA 19103-1814, Attention: Payoffs/Reinstatements Department.

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter. (Do not use if not applicable.) N/A.

IF YOU DO NOT CURE THE DEFAULT-If you do not cure the default within THIRTY (30) DAYS of the date of this Notice, the lender intends to exercise its rights to accelerate the mortgage debt. This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within THIRTY (30) DAYS, the lender also intends to instruct its attorney to start legal action to foreclose upon your mortgage property.

IF THE MORTGAGE IS FORECLOSED UPON- The mortgage property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

OTHER LENDER REMEDIES-The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

EXHIBIT A

RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE-If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the total amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. Curing your default in the manner set forth in this notice will restore your mortgage to the same position as if you had never defaulted.

EARLIEST POSSIBLE SHERIFF'S SALE DATE-It is estimated that the earliest date that such a Sheriff's Sale of the mortgage property could be held would be approximately SIX (6) MONTHS from the date of this Notice. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

HOW TO CONTACT THE LENDER:

**FEDERMAN AND PHELAN, L.L.P., One Penn Center at
Suburban Station, Suite 1400, 1617 John F. Kennedy
Boulevard, Philadelphia, PA 19103-1814
Tel: (215) 563-7000
Attention: Payoffs/Reinstatements Department**

EFFECT OF SHERIFF'S SALE-You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishings and other belongings could be started by the lender at any time.

ASSUMPTION OF MORTGAGE-You _____ may or X may not (CHECK ONE) sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charge and attorney's fees and cost are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

YOU MAY ALSO HAVE THE RIGHT:

- TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS.
- TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER
- TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY IS ATTACHED

Very truly yours,

FEDERMAN AND PHELAN, L.L.P.

Attn: Mary Harp

Account No.: 0073823335

Mailed by 1st Class mail /Certificate of Mailing and Certified Mail No:

Certified Article Number

7106 4575 1294 1904 1394

SENDERS RECORD

EXHIBIT A

**PENNSYLVANIA HOUSING FINANCE AGENCY
HOMEOWNER'S EMERGENCY ASSISTANCE PROGRAM
CONSUMER CREDIT COUNSELING AGENCIES
(REV. 8/00)**

CHESTER COUNTY

Acorn Housing Corporation
846 North Broad Street
Philadelphia, PA 19130
(215) 765-1221 FAX (215) 765-1427

Budget Counseling Center
247 North Fifth Street
Reading, PA 19601
(610) 375-7866 FAX (215) 375-7830

HACE
167 W. Allegheny Avenue, 2nd Fl.
Philadelphia, PA 19140
(215) 426-8025 FAX (215) 426-9122

Media Fellowship House
302 S. Jackson Street
Media, PA 19063
(610) 565-0846 FAX (610) 565-8567

Tabor Community Services, Inc.
439 East King Street
Lancaster, PA 17602
(717) 397-5182 or (800) 788-5602 (H.O. only)
FAX (717) 399-4127

American Red Cross of Chester
1729 Edgemont Avenue
Chester, PA 19013
(610) 874-1484

845 Coates Street
Coatesville, PA 19320
(888) 212-6741

American Credit Counseling Institute

144 E. Dekalb Pike
King Of Prussia, PA 19406
(610) 971-2210 FAX (610) 265-4814

Northwest Counseling Agency
5001 North Broad Street
Philadelphia, PA 19141
(215) 324-7500 FAX (215) 324-8753

CCCS of Delaware Valley
1515 Market Street, Suite 1325
Philadelphia, PA 19107
(215) 563-5665 FAX 563-7020

Community Housing Counseling, Inc.
P.O. Box 244
Kennett Square, PA 19348
(610) 444-3682 FAX (610) 444-3682

Philadelphia Council For Community Adv.
100 North 17th Street, Suite 600
Philadelphia, PA 19103
(215) 567-7803 FAX (215) 963-9941

Community Devel. Corp. of Frankford
Group Ministry
4620 Griscom Street
Philadelphia, PA 19124
(215) 744-2990 FAX (215) 744-2012

CCCS of Delaware Valley(Marshall Bldg.)
790 E. Market St., Suite 215
West Chester, PA 19382
(215) 563-5665

755 York Rd., Suite 103
Warminster, PA 18974
(215) 444-9429 FAX (215) 956-6344

CLARION COUNTY

CCCS of Western Pennsylvania, Inc.
YMCA Building
339 North Washington Street
Butler, PA 16001
(412) 282-7812

Keystone Economic Development Corporation
1954 Mary Grace Lane
Johnstown, PA 15901
(814) 535-6556 FAX (814) 539-1688

CCCS of Western Pennsylvania, Inc.
217 E. Plank Road
Altoona, PA 16602
(814) 944-8100 FAX (814) 944-5747

CLEARFIELD COUNTY

Indiana Co. Community Action Program
827 Water Street, Box 187
Indiana, PA 15701
(724) 465-2657 FAX (724) 465-5118

CCCS of Northeastern PA
1631 South Atherton St, Suite 100
State College, PA 16801
(814) 238-3668 FAX (814) 238-3669

ALL that certain piece or parcel or tract of land situate, lying and being in the City of DuBois, County of Clearfield and State of Pennsylvania, and being known as part of Lot No. 215 of the Rumbarger Addition to the City of DuBois, bounded and described as follows, to wit:

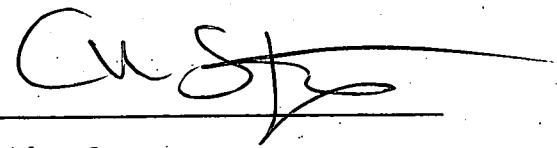
BEGINNING at a post at the corner of South State Street and Rumbarger Avenue; thence by South State Street, Northerly sixty (60) feet to a post at Lot No. 214; thence by Lot No. 214, Easterly sixty (60) feet to lot formerly of Robert O. Vail, now or formerly of Benjamin Shakespeare; thence by land now or formerly of Benjamin Shakespeare, Southerly sixty (60) feet to a post at Rumbarger Avenue; thence by Rumbarger Avenue, Westerly sixty (60) feet to a post at South State Street and place of beginning. And being a piece of land sixty (60) feet by sixty (60) feet in size and being the West end of Lot No. 215 as per Rumbarger's Addition to the City of DuBois.

BEING the same property which Sarah S. Zaycosky, Executrix of the Estate of John T. Swack, Jr., Deceased, by Deed dated December 28, 1998 and to be recorded herewith, granted and conveyed to Christina H. Shaffer, the Mortgagor herein.

PREMISES: 22 RUMBARGER AVENUE

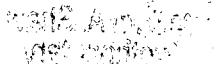
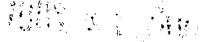
VERIFICATION

ADAM STYERS hereby states that he is ASSISTANT VICE PRESIDENT of WASHINGTON MUTUAL HOME LOANS, INC. mortgage servicing agent for Plaintiff in this matter, that he 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 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.



Adam Styers
Assistant Vice President

DATE: 8/9/01



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FILED

Bob
8
AUG 14 2001
M/11:00 a.m.
William A. Shaw
Prothonotary

1 CENT TO SHERIFF-

PP 80-
BY ATT

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11372

WASHINGTON MUTUAL HOME LOANS, INC

01-1313-CD

VS.

SHAFFER, CHRISTINA H.

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW AUGUST 17, 2001 AT 10:52 AM DST SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON CHRISTINA H. SHAFFER, DEFENDANT AT RESIDENCE, 22 RUMBARGER AVE., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CHRISTINA SHAFFER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: SNYDER/SHULTZ

Return Costs

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

Sworn to Before Me This

23rd 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 Marilyn Hahn*
Chester A. Hawkins
Sheriff

FILED
01/01/01
AUG 23 2001
*William A. Shaw
Prothonotary*

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

WASHINGTON MUTUAL HOME LOANS, INC.
F/K/A PNC MORTGAGE CORP OF AMERICA
539 SOUTH 4TH STREET
LOUISVILLE, KY 40202
vs.
CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
DUBOIS, PA 15801

: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS
: CIVIL DIVISION
: NO. 2001-1313-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
CHRISTINA H. SHAFFER, 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	\$37,719.46
Interest - 8/1/01 TO 10/12/01	\$ 497.13
TOTAL	\$38,216.59

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 Federma
FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 10-17-01

Will Shaw
PRO PROTHY

FILED

OCT 17 2001

William A. Shaw
Prothonotary

FEDERMAN AND PHELAN
BY: FRANK FEDERMAN, ESQUIRE
Identification No. 12248
1617 John F. Kennedy Boulevard Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

Attorney for Plaintiff

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

: COURT OF COMMON PLEAS

Plaintiff

: CIVIL DIVISION

vs.

: CLEARFIELD COUNTY

CHRISTINA H. SHAFFER

: NO. 2001-1313-CD

Defendant (s)

TO: CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
DUBOIS, PA 15801

DATE OF NOTICE: SEPTEMBER 17, 2001

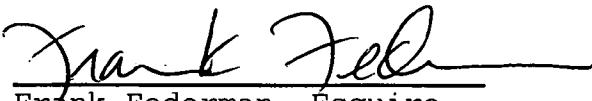
FILE COPY

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

1000 FILE

FILED

OCT 17 2001

MAILED atty *Edmunds, PC*
William A. Shaw
Prothonotary

not to pay
atty

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

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

: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS
: CIVIL DIVISION

vs.

: NO. 2001-1313-CD

CHRISTINA H. SHAFFER

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 CHRISTINA H. SHAFFER is over 18 years of age and resides at 22 RUMBARGER AVENUE, DUBOIS, PA 15801.

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

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

) NO. 2001-1313-CD

Plaintiff

vs.

CHRISTINA H. SHAFFER

)

Defendants

)

Notice is given that a Judgment in the above-captioned
matter has been entered against you on October 17, 2001

By: Willie 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.

AFFIDAVIT OF SERVICE

KMD

PLAINTIFF	WASHINGTON MUTUAL HOME LOANS, INC. F/K/A PNC MORTGAGE CORP OF AMERICA	CLEARFIELD COUNTY No. 2001-1313-CD
DEFENDANT(S)	CHRISTINA H. SHAFFER	Type of Action - Notice of Sheriff's Sale
SERVE AT	22 RUMBARGER AVENUE DUBOIS, PA 15801	Sale Date: February 1, 2002

SERVED

Served and made known to Christina H Shaffer, Defendant, on the 5 day of Dec, 2001, at 11:15, o'clock A.m., at 22 Rumbarger Ave,

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: _____

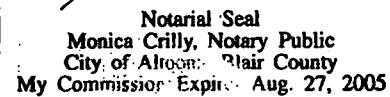
Description: Age 25 Height 5'6" Weight 110 Race W Sex F Other

I, Robert L. Pyle, 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 5th day
of December, 2001.

Notary:

By: R L P



Member, Pennsylvania Association of Notaries

NOT SERVED

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

_____ Moved _____ Unknown _____ No Answer _____ Vacant

Other:

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

By:

Loan # 0073823335

Attorney for Plaintiff

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

FILED

DEC 24 2001

William A. Shaw
Prothonotary

FILED

DEC 24 2001

William A. Shaw, Jr.
Prothonotary

cc to aty

PRAECIPE FOR WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)

P.R.C.P. 3180-3183

WASHINGTON MUTUAL HOME LOANS, : CLEARFIELD
INC. F/K/A PNC MORTGAGE CORP :
OF AMERICA : COURT OF COMMON
539 SOUTH 4TH STREET : PLEAS
LOUISVILLE, KY 40202 : CIVIL DIVISION

Plaintiff : NO. 2001-1313-CD

vs.

CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
DUBOIS, PA 15801

Defendant(s)

TO THE DIRECTOR OF THE PROTHONOTARY:

Issue writ of execution in the above matter:

Amount Due \$ 38,216.59

Interest from \$ _____ and Costs
OCTOBER 13, 2001 to (sale date)
(per diem - \$6.28)

Frank Federman
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. 17 2001

William A. Shaw
Prothonotary

NO. 2001-1313-CD Term
IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

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

vs.

CHRISTINA H. SHAFFER

PRAECLYPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed:

Frank J. Dernier

Attorney for Plaintiff

22 RUMBARGER AVENUE
DUBOIS, PA 15801

Where papers may be served.

Address: *Frank J. Dernier*
Where papers may be served.

ALL THAT CERTAIN piece or parcel or tract of land situate, lying and being in the City of DuBois, County of Clearfield and State of Pennsylvania, and being known as part of lot No. 215 of Rumbarger Addition to the City of DuBois, bounded and described as follows, to wit:

BEGINNING at a post at the corner of South State Street and Rumbarger Avenue; thence by South State Street, Northerly sixty (60) feet to a post at Lot No. 214; thence by Lot No. 214, Easterly sixty (60) feet to lot formerly of Robert O. Vail, now or formerly of Benjamin Shakespeare; thence by land now or formerly of Benjamin Shakespeare, Southerly sixty (60) feet to a post at Rumbarger Avenue; thence by Rumbarger Avenue, Westerly sixty (60) feet to a post at South State Street and place of beginning. And being a piece of land sixty (60) feet by sixty (60) feet in size and being the West end of Lot No. 215 as per Rumbarger's Addition to the City of DuBois.

Map #009-000-02454

Control #0075-07926

PARCEL # 7-5-09-2454

TITLE TO SAID PREMISES IS VESTED IN Christina H. Shaffer, an individual by Deed from Sarah S. Zaycosky, as Executrix of the estate of John T. Swack, Jr., deceased dated 12/28/98, recorded 1/4/99, in Instrument ID #19990027.

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

COPY

WASHINGTON MUTUAL HOME LOANS,
INC. F/K/A PNC MORTGAGE CORP
OF AMERICA
539 SOUTH 4TH STREET
LOUISVILLE, KY 40202

: CLEARFIELD
: COURT OF COMMON
: PLEAS
: CIVIL DIVISION
: NO. 2001-1313-CD

Plaintiff

vs.

CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
DUBOIS, PA 15801

Defendant(s)

COMMONWEALTH OF PENNSYLVANIA:

COUNTY OF CLEARFIELD:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

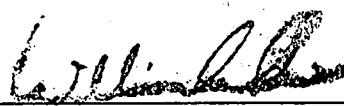
To satisfy the judgment, interest and costs in the above matter, you are directed to levy upon and sell the following described property (specifically described property below):

Premises 22 RUMBARGER AVENUE, DUBOIS, PA 15801
(see attached legal description)

Amount Due \$ 38,216.59

Interest from \$ _____
OCTOBER 13, 2001 to (sale date)
(per diem - \$6.28)

Total \$ 120.00 Plus Costs as endorsed


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

Dated: 10-17-01
(Seal)

No. 2001-1313-CD Term

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

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

vs.

CHRISTINA H. SHAFFER

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Office of the Prothonotary

Judg. Fee

CR.

Sat.

Frank Zilberman

Attorney for Plaintiff

22 RUMBARGER AVENUE,
DUBOIS, PA 15801
Where papers may be served.

Address:

ALL THAT CERTAIN piece or parcel or tract of land situate, lying and being in the City of DuBois, County of Clearfield and State of Pennsylvania, and being known as part of lot No. 215 of Rumbarger Addition to the City of DuBois, bounded and described as follows, to wit:

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Map #009-000-02454

Control #0075-07926

PARCEL # 7-5-09-2454

TITLE TO SAID PREMISES IS VESTED IN Christina H. Shaffer, an individual by Deed from Sarah S. Zaycosky, as Executrix of the estate of John T. Swack, Jr., deceased dated 12/28/98, recorded 1/4/99, in Instrument ID #19990027.

7. *Opportunities for Growth and Development* 2010-11

BRUNSWICK 35. 7. 19
MERTON 10. 7. 19

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2001 7 21

○ 13. 11
William A. Shaw
Prothonotary

Watty Teitman
Pd \$20.00
Edd Lownts Sherry

FEDERMAN AND PHELAN
By: FRANK FEDERMAN, ESQUIRE
IDENTIFICATION NO. 12248
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000
WASHINGTON MUTUAL HOME LOANS, INC.
F/K/A PNC MORTGAGE CORP OF AMERICA

ATTORNEY FOR PLAINTIFF
COURT OF COMMON PLEAS
CIVIL DIVISION

v.

NO. 2001-1313-CD

CHRISTINA H. SHAFFER

CLEARFIELD COUNTY

AFFIDAVIT OF SERVICE OF NOTICE OF SHERIFF'S SALE
PURSUANT TO P.R.C.P., 404(2)/403

FRANK FEDERMAN, ESQUIRE, Attorney for Plaintiff, hereby certifies that service of the Notice of Sheriff's Sale was made by sending a true and correct copy by certified mail to Defendant, CHRISTINA H. SHAFFER, at 303A SOUTH HIGHLAND AVENUE, BUBOIS, PA 15801, which notice of Sheriff's Sale was received by Defendant, CHRISTINA H. SHAFFER, on JULY 25, 2002 as evidenced by the attached return receipt.

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


FILED FRANK FEDERMAN, ESQUIRE
ATTORNEY FOR PLAINTIFF

August 8, 2002

AUG 13 2002

11:30 AM
William A. Shaw
Prothonotary

NO COPIES


2. Article Number



7160 3901 9844 8597 1974

3. Service Type CERTIFIED MAIL

4. Restricted Delivery? (Extra Fee) Yes

1. Article Addressed to:

CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
BUBOIS, PA 15801

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

CHRISTINA H. SHAFFER

C. Signature

X

D. Is delivery address different from item 1?
If YES, enter delivery address below:

303A SOUTH HIGHLAND AVE
BUBOIS PA

Date of Delivery

05 25 2002

Agent
 Addressee
 Yes
 No

SHAFFER, CHRISTINA

TEAM2

PS Form 3811, July 2001

Domestic Return Receipt

FILED

AUG 13 2002

William A. Shaw
Prothonotary

FEDERMAN AND PHELAN, L.L.P.
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
215-563-7000
Main Fax 215-563-5534
Michael.Polizze@fedphe-pa.com

August 8, 2002

Office of the Prothonotary
CLEARFIELD County Courthouse

RE: WASHINGTON MUTUAL HOME LOANS, INC.
F/K/A PNC MORTGAGE CORP OF AMERICA
v. CHRISTINA H. SHAFFER
CLEARFIELD COUNTY, NO. 2001-1313-CD

Dear Sir,

Please file the enclosed affidavit(s) in reference to the above captioned matter. Kindly return the attorney copy in the self addressed stamped envelope that has been provided for your convenience.

Thank you for your cooperation.

No. COPIES ON
S/A 1 S/c

Yours truly,
MP
Michael Polizze
for Federman and Phelan

CC: Sheriff's Office of CLEARFIELD County

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

RE: WASHINGTON MUTUAL HOME LOANS, INC. F/K/A PNC MORTGAGE
CORP OF AMERICA) CIVIL ACTION
)
)

vs.

CHRISTINA H. SHAFFER) CIVIL DIVISION
) NO. 2001-1313-CD

AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF CLEARFIELD) SS:
)

I, FRANK FEDERMAN, ESQUIRE attorney for WASHINGTON MUTUAL
HOME LOANS, INC. F/K/A PNC MORTGAGE CORP OF AMERICA hereby
verify that on 7/18/02 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 7/18/02 by
certified mail return receipt requested see Exhibit "B" attached hereto.

DATE: August 13, 2002


FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

FILED

 AUG 19 2002

01135/noc
William A. Shaw
Prothonotary

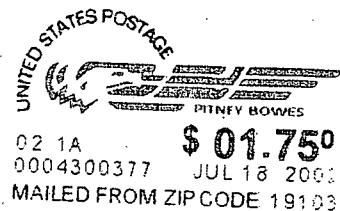
Name and
Address
of Sender

FEDERMAN & PHELAN
One Penn Center at Suburban, Suite 1400
Philadelphia, PA 19103

Line Article Number Name of Addressee, Street, and Post Office Address

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage
1	TEAM2 *****	CLEARFIELD COUNTY DOMESTIC RELATIONS DEPARTMENT CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830	
2	*****	COMMONWEALTH OF PA DEPT. OF WELFARE P.O. BOX 2675 HARRISBURG, PA 17105	
3	*****	TENANT/OCCUPANT DUBOIS, PA 15801	
4	*****	CITIFINANCIAL, INC. 77 BEAVER DRIVE DUBOIS, PA 15801	
5	*****	COMMONWEALTH OF PENNSYLVANIA BUREAU OF INDIVIDUAL TAX INHERITANCE TAX DIVISION ATTN: JOHN MURPHY 6 TH FLOOR, STRAWBERRY SQUARE DEPT. #280601 HARRISBURG, PA 17128	
6	*****	DEPARTMENT OF PUBLIC WELFARE TPL CASUALTY UNIT ESTATE RECOVERY PROGRAM P.O. BOX 8486 WILLOW OAK BUILDING HARRISBURG, PA 17105-8486	
7	*****	INTERNAL REVENUE SERVICE FEDERATED INVESTORS TOWER THIRTEENTH FLOOR SUITE 1300 1001 LIBERTY AVENUE PITTSBURGH, PA 15222	
8	*****		
9	*****		
10	*****		
15	RE: SHAFFER, CHRISTINA	GRH	
Total Number of Pieces Listed by Sender	Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)	

TEAM 2



7160 3901 9844 8597 1974

TO: CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
BUBOIS, PA 15801

TEAM 2

SENDER: TEAM2 GRH

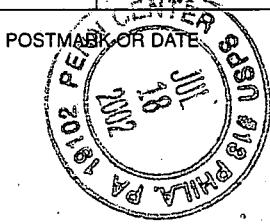
REFERENCE: SHAFFER, CHRISTINA

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 # 12762

WASHINGTON MUTUAL HOME LOANS ET AL

2001-1313-CD

VS.

SHAFFER, CHRISTINA H.

WRIT OF EXECUTION - REAL ESTATE

SHERIFF RETURNS

NOW, JULY 12, 2002 @ 8:48 A.M. O'CLOCK A LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDANT, CHRISTINA H. SHAFFER. THE PROPERTY WAS ALSO POSTED THIS DATE.

A SALE DATE OF SEPTEMBER 6, 2002 WAS SET.

FILED

01346-01
NOV 21 2002

William A. Shaw
Prothonotary

NOW, JULY 30, 2002 @ 4:55 P.M. O'CLOCK SERVED CHRISTINA H. SHAFFER AT HER RESIDENCE 303 SOUTH HIGHLAND,, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA 15801 BY HANDING TO MICHAEL WALT, FIANCE OF THE DEFENDANT, A TRUE AND ATTESTED ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY AND MAKING KNOWN TO HIM THE CONTENTS THEREOF.

NOW, SEPTEMBER 6, 2002, A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANT. THE PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR \$1.00 + COSTS.

NOW, SEPTEMBER 16, 2002 BILLED ATTORNEY FOR COSTS DUE.

NOW, OCTOBER 8, 2002 RECEIVED CHECK FROM ATTORNEY.

NOW, NOVEMBER 5, 2002 INFORMED ATTORNEY NEED \$10.00 TO FILE DEED

NOW, NOVEMBER 15, 2002 RECEIVED \$10.00 FROM ATTORNEY

NOW, NOVEMBER 19, 2002 PAID COSTS FROM ADVANCE AND ATTORNEY CHECK.

NOW, NOVEMBER 21, 2002 RETURN WRIT AS SALE BEING HELD ON THE PROPERTY OF THE DEFENDANT.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12762

WASHINGTON MUTUAL HOME LOANS ET AL

2001-1313-CD

VS.

SHAFFER, CHRISTINA H.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

PROPERTY PURCHASED BY THE PLAINTIFF FOR \$1.00 + COSTS.

NOW, NOVEMBER 21, 2002 FILED DEED.

SHERIFF HAWKINS \$222.49

SURCHARGE \$20.00

PAID BY ATTORNEY

Sworn to Before Me This

21st Day Of Nov 2002

Walter L. Shan
Deputy Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,

Chester A. Hawkins
By Cynthia Butler Augherbaugh
Chester A. Hawkins
Sheriff

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

WASHINGTON MUTUAL HOME LOANS,
INC. F/K/A PNC MORTGAGE CORP
OF AMERICA
539 SOUTH 4TH STREET
LOUISVILLE, KY 40202

Plaintiff

vs.

CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
DUBOIS, PA 15801

Defendant(s)

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 22 RUMBARGER AVENUE, DUBOIS, PA 15801
(see attached legal description)

Amount Due : \$ 38,216.59

Interest from : \$ _____
10/13/01 (sale date)
(per diem - \$6.28)

Total : \$ _____ Plus Costs as endorsed.

Prothonotary Costs : 433.83


Clerk

Office of Prothonotary
Common Pleas Court of
CLEARFIELD County, PA

Dated: 5/31/02
(Seal) No. 2001-1313-CD Term

Received 5/31/02 @ 3:34 P.M.

Chester A. Hawkins

by Cynthia Butler - Augenblick

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

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

vs.

CHRISTINA H. SHAFFER

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Office of the Prothonotary

Judg. Fee:

Cr.
 Sat.


Attorney for Plaintiff

22 RUMBARGER AVENUE
BUBOIS, PA 15801

Address:

Where papers may be served

ALL THAT CERTAIN piece or parcel or tract of land situate, lying and being in the City of DuBois, County of Clearfield and State of Pennsylvania, and being known as part of lot No. 215 of Rumbarger Addition to the City of DuBois, bounded and described as follows, to wit:

BEGINNING at a post at the corner of South State Street and Rumbarger Avenue; thence by South State Street, Northerly sixty (60) feet to a post at Lot No. 214; thence by Lot No. 214, Easterly sixty (60) feet to lot formerly of Robert O. Vail, now or formerly of Benjamin Shakespeare; thence by land now or formerly of Benjamin Shakespeare, Southerly sixty (60) feet to a post at Rumbarger Avenue; thence by Rumbarger Avenue, Westerly sixty (60) feet to a post at South State Street and place of beginning. And being a piece of land sixty (60) feet by sixty (60) feet in size and being the West end of Lot No. 215 as per Rumbarger's Addition to the City of DuBois.

Map #009-000-02454

Control #0075-07926

TITLE TO SAID PREMISES IS VESTED IN Christina H. Shaffer, an individual by Deed from Sarah S. Zaycosky, as Executrix of the estate of John T. Swack, Jr., deceased dated 12/28/98, recorded 1/4/99, in Instrument ID #19990027.

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME SHAFFER NO. 01-1313-CD

NOW, SEPT. 6, 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 6TH day of SEPT. 2002, I exposed the within described real estate of CHRISTINA H. SHAFFER to public venue or outcry at which time and place I sold the same to WASHINGTON MUTUAL HOME LOANS, INC., F/K/A PNC MORTGAGE CORP. OF AMERICA 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
MIELAGE	12.35
POSTING	15.00
CSDS	10.00
COMMISSION 2%	
POSTAGE	4.44
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	12.35
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES/BILLING	15.00
	5.00
BILLING/PHONE/FAX	5.00
TOTAL SHERIFF COSTS	222.49

DEED COSTS:

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

DEBIT & INTEREST:

DEBT-AMOUNT DUE	38,216.59
INTEREST from 10/12/01 (sale date) (per TO BE ADDED diem - \$6.280)	
TOTAL DEBT & INTEREST	38,216.59
COSTS:	
ATTORNEY FEES	
PROTH. SATISFACTION	
ADVERTISING	665.82
LATE CHARGES & FEES	
TAXES - collector	NONE
TAXES - tax claim	634.91
DUE	
COST OF SUIT -TO BE ADDED	
LIEN SEARCH	100.00
FORCLOSURE FEES/ESCROW DEFICIT	
ACKNOWLEDGEMENT	5.00
DEED COSTS	29.00
ATTORNEY COMMISSION	
SHERIFF COSTS	222.49
LEGAL JOURNAL AD	144.00
REFUND OF ADVANCE	
REFUND OF SURCHARGE	
PROTHONOTARY	433.83
MORTGAGE SEARCH	40.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
MUNICIPAL LIEN	
TOTAL COSTS	2,275.05

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

WASHINGTON MUTUAL HOME LOANS,
INC. F/K/A PNC MORTGAGE CORP
OF AMERICA
539 SOUTH 4TH STREET
LOUISVILLE, KY 40202

Plaintiff

1 : CLEARFIELD
2 :
3 : COURT OF COMMON
4 : PLEAS
5 :
6 : CIVIL DIVISION
7 :
8 : NO. 2001-1313-CD

vs.

CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
DUBOIS, PA 15801

Defendant(s)

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):

Premises22 RUMBARGER AVENUE, DUBOIS, PA 15801
(see attached legal description)

Amount Due \$ 38,216.59
Interest from \$ _____
OCTOBER 13, 2001 to (sale date)
(per diem - \$6.28)
Total \$ 100.00 Plus Costs as endorsed

RECEIVED OCT 17 2001

④ 3:23 pm

① 3:23 PM
Wester A. Hartings
by Margaret H. Pratt

Dated: 10.17.01
(Seal)

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

60-100

NO. 2001-1313-CD Term

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

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

vs.

CHRISTINA H. SHAFFER

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Office of the Prothonotary

Judg. Fee

Cr.

Sat.

Frank Lehman
Attorney for Plaintiff

Address:

22 RUMBARGER AVENUE,
DUBOIS, PA 15801

Where papers may be served.

ALL THAT CERTAIN piece or parcel or tract of land situate, lying and being in the City of DuBois, County of Clearfield and State of Pennsylvania, and being known as part of lot No. 215 of Rumbarger Addition to the City of DuBois, bounded and described as follows, to wit:

BEGINNING at a post at the corner of South State Street and Rumbarger Avenue; thence by South State Street, Northerly sixty (60) feet to a post at Lot No. 214; thence by Lot No. 214, Easterly sixty (60) feet to lot formerly of Robert O. Vail, now or formerly of Benjamin Shakespeare; thence by land now or formerly of Benjamin Shakespeare, Southerly sixty (60) feet to a post at Rumbarger Avenue; thence by Rumbarger Avenue, Westerly sixty (60) feet to a post at South State Street and place of beginning. And being a piece of land sixty (60) feet by sixty (60) feet in size and being the West end of Lot No. 215 as per Rumbarger's Addition to the City of DuBois.

Map #009-000-02454

Control #0075-07926

PARCEL # 7-5-09-2454

TITLE TO SAID PREMISES IS VESTED IN Christina H. Shaffer, an individual by Deed from Sarah S. Zaycosky, as Executrix of the estate of John T. Swack, Jr., deceased dated 12/28/98, recorded 1/4/99, in Instrument ID #19990027.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11666

WASHINGTON MUTUAL HOME LOANS, INC. F/K/A

01-1313-CD

VS.

SHAFFER, CHRISTINA H.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

NOW, NOVEMBER 29, 2001, AT 12:15 PM O'CLOCK A LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDANT. PROPERTY WAS POSTED THIS DATE.

A SALE IS SET FOR FRIDAY, FEBRUARY 1, 2002, AT 10:00 AM O'CLOCK.

NOW, NOVEMBER 30, 2001, AT 1:00 PM O'CLOCK SERVED WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY ON CHRISTINA H. SHAFFER, DEFENDANT, AT HER PLACE OF RESIDENCE, 22 RUMBARGER AVENUE, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, 15801, BY HANDING TO CHRISTINA H. SHAFFER, DEFENDANE, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY AND MADE KNOWN TO HER THE CONTENTS THEREOF.

NOW, DECEMBER 21, 2001, RECEIVED A FAX FROM GREGORY WILKINS, ATTORNEY FOR THE PLAINTIFF, THAT DEFENDANT FILED CHAPTER 7 BANKRUPTCY. SALE IS TO BE STAYED AND WRIT RETURNED TO PROTHONOTARY.

NOW, JANUARY 3, 2002, CANCELLED ADVERTISING IN COURIER EXPRESS AND LEGAL JOURNAL.

NOW, JANUARY 31, 2002, RETURN WRIT AS NO SALE HELD, DEFENDANT FILED CHAPTER 7 BANKRUPTCY. PAID COSTS FROM ADVANCE AND MADE REFUND OF UNUSED ADVANCE TO THE ATTORNEY.

**SHERIFF HAWKINS \$213.48
SURCHARGE \$ 40.00
PAID BY ATTORNEY**

**FILED NO
01-1313-CD
JAN 31 2002**

**William A. Shaw
Prothonotary**

EKL

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11666

WASHINGTON MUTUAL HOME LOANS, INC. F/K/A

01-1313-CD

VS.

SHAFFER, CHRISTINA H.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

Sworn to Before Me This

31st Day Of Jan, 2002

William A. Shaw

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

So Answers,

Chester A. Hawkins
by Maryann W. Purt
Chester A. Hawkins
Sheriff

FEDERMAN AND PHELAN, L.L.P.
One Penn Center at Suburban Station
1617 John F. Kennedy
Suite 1400
Philadelphia, PA 19103-1814
215-563-7000
Main Fax 215-563-5534
Greg.Wilkins@fedphe-pa.com

Gregory Wilkins
Legal Assistant, Ext. 1256

Representing Lenders in
Pennsylvania and New Jersey

December 21, 2001

Office of the Sheriff
Clearfield County Courthouse
230 East Market Street
Clearfield, PA 16830

ATTENTION: PEGGY (814) 765-5915

Re: **WASHINGTON MUTUAL HOME LOANS, INC.,**
F/K/A PNC MORTGAGE CORP. OF AMERICA
v. CHRISTINA H. SHAFFER
No. 2001-1313-CD
Premises: 22 RUMBARGER AVENUE, DUBOIS, PA 15801

Dear Peggy:

Please STAY the Sheriff's Sale of the above referenced property, which is scheduled for FEBRUARY 1, 2002.

The Defendant(s) filed a Chapter 7 Bankruptcy on DECEMBER 10, 2001 at 01-32378.

No funds were received in consideration for the stay.

Please return the original writ of execution to the Prothonotary as soon as possible.

Very truly yours,

Gregory Wilkins

cc: **WASHINGTON MUTUAL HOME LOANS, INC.**

COPIED

REAL ESTATE SALE

REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION

REAL ESTATE SALE

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 forth 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	4.08
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	
DEED	<u>30.00</u>
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	
RETURNS/DEPUTIZE	
COPIES / BILLING	\$15.00 + <u>2.00</u>
BILLING - PHONE - FAX	<u>20.00</u>
TOTAL SHERIFF COSTS	\$ <u>213.48</u>

DEED COSTS:

REGISTER & RECORDER	\$
ACKNOWLEDGEMENT	
TRANSFER TAX 2%	15.50
	5.00
	<u>20.50</u>

TOTAL DEED COSTS \$

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

Chesler A. Hawkins, Sheriff

DEBT & INTEREST:

DEBT-AMOUNT DUE	\$ 38,216.59
INTEREST FROM 10-13-01 TO SALE DATE @\$6.28	TO BE ADDED
TOTAL DEBT & INTEREST	\$38,216.59

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	\$
LEGAL JOURNAL AD	\$
REFUND OF ADVANCE	\$
REFUND OF SURCHARGE	\$
PROTHONOTARY	\$ 120.00

TOTAL COSTS \$ 518.43

PRAECIPE FOR WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)

P.R.C.P. 3180-3183

WASHINGTON MUTUAL HOME LOANS,
INC. F/K/A PNC MORTGAGE CORP
OF AMERICA
539 SOUTH 4TH STREET
LOUISVILLE, KY 40202

: CLEARFIELD COUNTY
: COURT OF COMMON
: PLEAS
: CIVIL DIVISION
: NO. 2001-1313-CD

Plaintiff

vs.

CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
BUBOIS, PA 15801

Defendant(s)

TO THE DIRECTOR OF THE PROTHONOTARY:

Issue writ of execution in the above matter:

Amount Due	\$ 38,216.59
Interest from 10/13/01 (sale date) (per diem - \$6.28)	\$ _____ and Costs

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

Note: Please attach description of property.

FILED

MAY 31 2002

William A. Shaw
Prothonotary

NO. 2001-1313-CD Term
IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

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

vs.

CHRISTINA H. SHAFFER

PRAECLPTE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed:



Christina H. Shaffer

Attorney for Plaintiff

22 RUMBARGER AVENUE
BUBBOIS, PA 15801

Address :

Where papers may be served.

ALL THAT CERTAIN piece or parcel or tract of land situate, lying and being in the City of DuBois, County of Clearfield and State of Pennsylvania; and being known as part of lot No. 215 of Rumbarger Addition to the City of DuBois; bounded and described as follows, to wit:

BEGINNING at a post at the corner of South State Street and Rumbarger Avenue; thence by South State Street, Northerly sixty (60) feet to a post at Lot No. 214; thence by Lot No. 214, Easterly sixty (60) feet to lot formerly of Robert O. Vail, now or formerly of Benjamin Shakespeare; thence by land now or formerly of Benjamin Shakespeare, Southerly sixty (60) feet to a post at Rumbarger Avenue; thence by Rumbarger Avenue, Westerly sixty (60) feet to a post at South State Street and place of beginning. And being a piece of land sixty (60) feet by sixty (60) feet in size and being the West end of Lot No. 215 as per Rumbarger's Addition to the City of DuBois.

Map #009-000-02454

Control #0075-07926

TITLE TO SAID PREMISES IS VESTED IN Christina H. Shaffer, an individual by Deed from Sarah S. Zaycosky, as Executrix of the estate of John T. Swack, Jr., deceased dated 12/28/98, recorded 1/4/99, in Instrument ID #19990027.

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

ATTORNEY FOR PLAINTIFF

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

: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS
: CIVIL DIVISION
: NO. 2001-1313-CD

vs.

CHRISTINA H. SHAFFER

CERTIFICATION

FRANK FEDERMAN, ESQUIRE, hereby states that he is the attorney for the Plaintiff in the above captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

() an FHA Mortgage
() non-owner occupied
() vacant
(x) Act 91 procedures have been fulfilled

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


FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

vs.

CHRISTINA H. SHAFFER

Defendant(s)

) CIVIL DIVISION

) NO. 2001-1313-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

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

Plaintiff in the above action, sets forth as of the date the Praecep for the Writ of Execution was filed the following information concerning the real property located at 22 RUMBARGER AVENUE, DUBOIS, PA 15801.

1. Name and address of owner(s) or reputed owner (s):

Name Address (if address cannot be reasonably ascertained, please so indicate)

CHRISTINA H. SHAFFER 22 RUMBARGER AVENUE
DUBOIS, PA 15801

2. Name and address of defendant(s) in the judgment:

Name Address (if address cannot be reasonably ascertained, please so indicate)

SAME AS ABOVE

3. Name and address of every judgment creditor whose judgment is a record lien on the real property to be sold:

Name Address (if address cannot be reasonably ascertained, please so indicate)

NONE

4. Name and address of the last recorded holder of every mortgage of record:

Name Address (if address cannot be reasonably ascertained, please so indicate)

CITIFINANCIAL, INC.

77 BEAVER DRIVE
DUBOIS, PA 15801

5. Name and address of every other person who has any record lien on the property:

Name Address (if address cannot be reasonably ascertained, please so indicate)

NONE

6. Name and address of every other person who has any record interest in the property and whose interest may be affected by the sale:

Name Address (if address cannot be reasonably ascertained, please so indicate)

COMMONWEALTH OF PENNSYLVANIA
BUREAU OF INDIVIDUAL TAX
INHERITANCE TAX DIVISION
ATTN: JOHN MURPHY

DEPARTMENT OF PUBLIC WELFARE
TPL CASUALTY UNIT
ESTATE RECOVERY PROGRAM

INTERNAL REVENUE SERVICE
FEDERATED INVESTORS TOWER
THIRTEENTH FLOOR SUITE 1300

CLEARFIELD COUNTY DOMESTIC
RELATIONS DEPARTMENT

6TH FLOOR, STRAWBERRY SQUARE
DEPT. #280601

HARRISBURG, PA 17128

P.O. BOX 8486
WILLOW OAK BUILDING
HARRISBURG, PA 17105-8486

1001 LIBERTY AVENUE
PITTSBURGH, PA 15222

CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET STREET
CLEARFIELD, PA 16830

7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale:

Name Address (if address cannot be reasonably ascertained, please so indicate)

COMMONWEALTH OF PA
DEPT. OF WELFARE

P.O. BOX 2675
HARRISBURG, PA 17105

TENANT/OCCUPANT

22 RUMBARGER AVENUE
DUBOIS, PA 15801

(Attach separate sheet if more space is needed)

I verify that the statements made in this affidavit are true and correct to the best of my personal knowledge or information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. #4904 relating to unsworn falsification to authorities.

May 30, 2002
Date


FRANK FEDERMAN, ESQ.
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

Plaintiff) CIVIL DIVISION
vs.)
)
TINA H. SHAFFER)
Defendant(s)) NO. 2001-1313-CD

NOTICE OF SHERIFF'S SALE OF REAL ESTATE

TO: CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
BUBOIS, PA 15801

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.

Your house (real estate) at 22 RUMBARGER AVENUE, DUBOIS, PA 15801, is scheduled to be sold at the Sheriff's Sale on _____ at _____ A.M. in the CLEARFIELD County Courthouse, 1 North 2nd Street, Suite 116, Clearfield, PA 16830 to enforce the court judgment of \$38,216.59 obtained by WASHINGTON MUTUAL HOME LOANS, INC. F/K/A PNC MORTGAGE CORP OF AMERICA (the mortgagee) against you. In the event the sale is continued, an announcement will be made at said sale in compliance with Pa.R.C.P. Rule 3129.3.

NOTICE OF OWNER'S RIGHTS

YOU MAY BE ABLE TO PREVENT THIS SHERIFF'S SALE

To prevent this Sheriff's Sale, you must take immediate action:

1. The sale will be cancelled if you pay to the mortgagee the Back payments, late charges, costs and reasonable attorney's Fees due. To find out how much you must pay, you may call:
215-563-7000
2. You may be able to stop the sale by filing a petition asking the Court to strike or open the judgment, if the judgment was improperly entered. You may also ask the Court to postpone the sale for good cause.
3. You may also be able to stop the sale through other legal proceedings. You may need an attorney to assert your rights. The sooner you contact e, the more chance you will have of stopping the sale. (See notice on page o on how to obtain an attorney.)

YOU MAY STILL BE ABLE TO SAVE YOUR PROPERTY AND YOU HAVE OTHER RIGHTS EVEN IF THE SHERIFF'S SALE DOES TAKE PLACE.

1. If the Sheriff's Sale is not stopped, your property will be sold to the highest bidder. You may find out the price bid by calling (215) 563-7000.
2. You may be able to petition the Court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.

3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened, you may call (215) 563-7000.

4. If the amount due from the Buyer is not paid to the Sheriff, you will remain the owner of the property as if the sale never happened.

5. You have the right to remain in the property until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At this time, the buyer may bring legal proceedings to evict you.

6. You may be entitled to a share of the money which was paid for your house. A proposed schedule of distribution of the money bid for your house will be prepared by the Sheriff not later than thirty (30) days after the sale. The schedule shall be kept on file with the Sheriff and will be made available for inspection in his office. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after the filing of the proposed schedule.

7. You may also have other rights and defenses, or ways of getting your home back, if you act immediately after the sale.

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 LISTED BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

DAVID S. MEHOLICK
COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830

ALL THAT CERTAIN piece or parcel or tract of land situate, lying and being in the City of DuBois, County of Clearfield and State of Pennsylvania, and being known as part of lot No. 215 of Rumbarger Addition to the City of DuBois, bounded and described as follows, to wit:

BEGINNING at a post at the corner of South State Street and Rumbarger Avenue; thence by South State Street, Northerly sixty (60) feet to a post at Lot No. 214; thence by Lot No. 214, Easterly sixty (60) feet to lot formerly of Robert O. Vail, now or formerly of Benjamin Shakespeare; thence by land now or formerly of Benjamin Shakespeare, Southerly sixty (60) feet to a post at Rumbarger Avenue; thence by Rumbarger Avenue, Westerly sixty (60) feet to a post at South State Street and place of beginning. And being a piece of land sixty (60) feet by sixty (60) feet in size and being the West end of Lot No. 215 as per Rumbarger's Addition to the City of DuBois.

Map #009-000-02454

Control #0075-07926

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

WASHINGTON MUTUAL HOME LOANS,
INC. F/K/A PNC MORTGAGE CORP
OF AMERICA
539 SOUTH 4TH STREET
LOUISVILLE, KY 40202

:\b: CLEARFIELD COUNTY
:\b: COURT OF COMMON
:\b: PLEAS
:\b: CIVIL DIVISION
:\b: NO. 2001-1313-CD
:\b:
:\b:
:\b:
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:\b:
:\b:
:\b:

COPY

CHRISTINA H. SHAFFER
22 RUMBARGER AVENUE
BUBOIS, PA 15801

Defendant(s)

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):

Premises22 RUMBARGER AVENUE, DUBOIS, PA 15801
(see attached legal description)

Amount Due	\$ 38,216.59
Interest from 10/13/01 (sale date) (per diem - \$6.28)	\$ _____
Total	\$ _____
Prothonotary Costs	433.83

Williamson

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

Dated:

5131102

(Seal) No. 2001-1313-CD Term

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

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

vs.

CHRISTINA H. SHAFFER

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Office of the Prothonotary

Judg. Fee

Cr.

Sat.


Christina H. Shaffer

Attorney for Plaintiff

Address:

22 RUMBARGER AVENUE
BUBOIS, PA 15801

Where papers may be served.

ALL THAT CERTAIN piece or parcel or tract of land situate, lying and being in the City of DuBois, County of Clearfield and State of Pennsylvania, and being known as part of lot No. 215 of Rumbarger Addition to the City of DuBois, bounded and described as follows, to wit:

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Control #0075-07926

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