

01-1444-CD
NATIONAL CITY BANK -vs- KATHY J. GILLEN etal

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee : COURT OF COMMON PLEAS
for the Registered Holders of : CIVIL DIVISION
Credit Suisse First Boston :
Mortgage Securities Corp Home : Clearfield County
Equity Loan Trust 2000-HE1, :
Home Equity Loan Pass - :
Through Certificates, Series :
2000-HE1 :
c/o Option One :
PO Box 57038 :
Irvine, CA 92619-7038 :
Plaintiff :

v.

Kathy J. Gillen
Randy Gillen
a/k/a Randy L. Gillen
725 Hill Street
Curwensville, PA 16833
Defendant(s)

NO. 01.1444.CO

COMPLAINT IN MORTGAGE FORECLOSURE

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.

LAWYERS REFERRAL SERVICE

Pennsylvania Lawyer Referral Service

Pennsylvania Bar Association

P.O.Box 186

Harrisburg, PA 17108

800-932-0311

717-238-6715

Email: info@pabar.org

Internet: www.pabar.org

FILED

SEP 04 2001

William A. Shaw
Prothonotary

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascantar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O.Box 186
Harrisburg, PA 17108
800-932-0311
717-238-6715
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Internet: www.pabar.org**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**LAW OFFICES OF MARK J. UDREN
/s/ Mark J. Udren, Esquire
1040 N. Kings Highway, Suite 500
Cherry Hill, NJ 08034
(856) 482-6900**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: Option One Mortgage Corporation

Assignee: National City Bank, as Trustee for the Registered Holders of Credit Suisse First Boston Mortgage Securities Corp Home Equity Loan Trust 2000-HE1, Home Equity Loan Pass - Through Certificates, Series 2000-HE1

Recording Date: **LODGED FOR RECORDING**

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with P.A.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 725 Hill Street

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Curwensville

COUNTY: Clearfield

DATE EXECUTED: 09/12/00

DATE RECORDED: 09/14/00 INSTR NO.: 200013656

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon

breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Note as follows:

(a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated below;

(b) by failing or refusing to pay other charges, if any, indicated below.

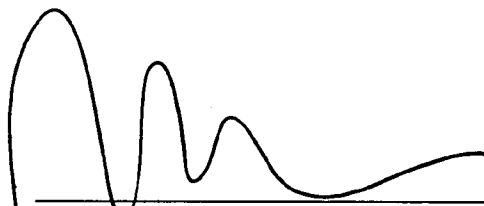
6. The following amounts are due on the said Mortgage as of 08/20/01:

Principal of debt due and unpaid	\$55,088.00
Interest at 11.35% from 04/01/01 to 08/20/01 (the per diem interest accruing on this debt is \$17.13 and that sum should be added each day after 08/20/01)	2,426.76
Title Report	250.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Escrow Overdraft/(Balance) (The monthly escrow on this account is \$0 and that sum should be added on the first of each month after 08/20/01)	-0-
Late Charges (monthly late charge of \$32.42 should be added on the fifteenth of each month after 08/20/01)	129.68
Other Fees	46.00
NSF Fee	20.00
Attorneys Fees (anticipated and actual to 5% of principal)	2,754.40
TOTAL	\$60,994.84

7. The attorney's fee 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 in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$60,994.84 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



Mark J. Udren, ESQUIRE
MARK J. UDREN & ASSOCIATES
Attorney for Plaintiff
Attorney I.D. No. 04302

ALL THAT CERTAIN LOT, PIECE OR PARCEL OF GROUND SITUATE, LYING AND BEING IN THE BOROUGH OF CURWENSVILLE, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, MORE FULLY BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POST ON HILL STREET AND CORNER OF FIFTEEN (15) FOOT ALLEY, AND BEING THE SOUTHWEST CORNER OF LOT HEREBY CONVEYED; THENCE ALONG HILL STREET NORTH SIXTY-THREE (63) DEGREES THIRTY (30) MINUTES EAST FIFTY (50) FEET TO A POST AND CORNER OF LOT CONVEYED TO ROY BLOOM; THENCE ALONG SAID LOT SOUTH TWENTY-SIX (26) DEGREES THIRTY (30) MINUTES EAST, ONE HUNDRED AND EIGHTY (180) FEET TO POST ON ALLEY AT REAR OF LOT; THENCE ALONG SAID ALLEY SOUTH SIXTY-THREE (63) DEGREES THIRTY (30) MINUTES WEST, FIFTY (50) FEET TO POST AND CORNER OF FIRST ABOVE NAMED ALLEY; THENCE ALONG SAID ALLEY NORTH TWENTY-SIX (26) DEGREES THIRTY (30) MINUTES WEST, ONE HUNDRED EIGHTY (180) FEET TO POST AND PLACE OF BEGINNING, BEING A LOT FRONTING FIFTY (50) FEET ON HILL STREET AND EXTENDING BACK ONE HUNDRED EIGHTY (180) FEET TO AN ALLEY, AND BEING LOT NO. 217 IN THE PLAN OF LOTS OF SOUTH CURWENSVILLE.

UNDER AND SUBJECT TO ALL EXCEPTIONS, RESERVATIONS, RESTRICTIONS, CONDITIONS, EASEMENTS, RIGHTS AND RIGHTS OF WAY AS CONTAINED IN PRIOR DEEDS AND INSTRUMENTS OF RECORD.



OPTION ONE
M O R T G A G E

Start Here. Finish Here.

July 05, 2001

Kathy J Gillen
Randy L Gillen
725 Hill St
Curwensville, PA 16833

PA-UPREN

Homeowners Name: Kathy J Gillen
Randy L Gillen
Property Address: 725 Hill St, Curwensville PA 16833
Loan Account No.: 366779-7
Original Lender: OPTION ONE
Current Lender/Servicer: Option One Mortgage Corporation

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 designated consumer credit counseling agencies listed at the end of this Notice.

THIS MEETING MUST OCCUR WITHIN THE NEXT (33) 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.

OP171

EXHIBIT A





Re: Loan No. 366779-7

Start Here. Finish Here.

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 NCT 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 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.

OP171





Re: Loan No. 366779-7

HOW TO CONTACT THE LENDER:

Name of Lender: Option One Mortgage Corporation
Address: 3 Ada
Address: Irvine, CA. 92618
Phone Number: 800-326-1500, Ext. 8004
Fax Number: 949-784-6032
Contact Person: JILL GLATT EXT 8001
Office hours: Monday through Thursday 7:00 a.m. to 9:00 p.m. PST
Friday 7:00 a.m. to 6:00 p.m. PST.

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, charges and attorney's fees and costs 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:

* 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 CURED THE DEFAULT. (HOWEVER, YOU DO 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.

OP174





Re: Loan No. 366779-7

Start Here. Finish Here.

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 attorneys to start legal action to foreclose upon your mortgaged property.

IF THE MORTGAGE IS FORECLOSED UPON - The mortgaged 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 brings 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 the 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.

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 mortgaged property could be held would be approximately (7) SEVEN 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.

OP173




OPTION ONE
M O R T G A G E

Re: Loan No. 366779-7

Start Here. Finish Here.

NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN
BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION
PURPOSES 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:
725 Hill St, Curwensville PA 16833
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:

(a) Monthly payments: 2 MONTHS @ \$ 540.33
1 MONTHS @ \$ 540.33

\$ 1620.99

(b) Previous late charges;

\$ 64.84

(c) Other charges; Escrow, Inspection,
NSF checks

\$ 20.00

(d) Other provisions of the mortgage obligation,
if any

\$

(e) TOTAL AMOUNT OF (a) (b) and (c) REQUIRED
AS OF THIS DATE

\$ 1705.83

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not
applicable):

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 \$1705.83, 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 send to:

Overnight Mail Address
3 Ada
Irvine, Ca. 92618

Western Union Quick Collect
Pay to: Option One Mortgage Corporation
Code City: Option, Ca

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.))

OP172



U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

3667797 Gillen PA

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (To be completed by mailer)

Street, Apt. No.; or PO Box No.

City, State, ZIP+ 4

PS Form 3800, February 2000 See Reverse for Instructions

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

667797 Gillen PA

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (To be completed by mailer)

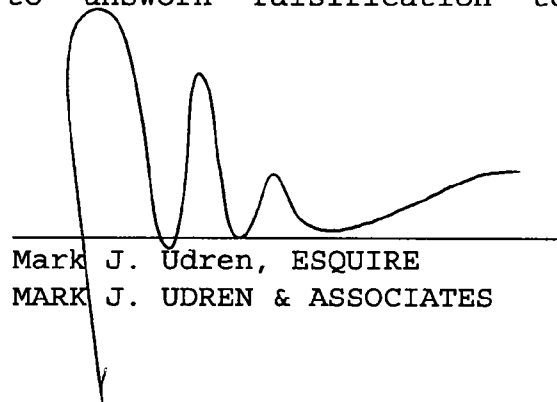
Street, Apt. No.; or PO Box No.

City, State, ZIP+ 4

Form 3800, February 2000 See Reverse for Instructions

V E R I F I C A T I O N

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation unless designated otherwise; that he is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.



Mark J. Udren, ESQUIRE
MARK J. UDREN & ASSOCIATES

FILED

SEP 04 2001

[Signature]
William A. Shaw
Prothonotary

Under
for \$80.00

of cc Shaw

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11481

NATIONAL CITY BANK

01-1444-CD

VS.

GILLEN, KATHY J. and RANDY

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW SEPTEMBER 10, 2001 AT 9:47 AM DST SERVED THE WITHIN COMPLAINT
IN MORTGAGE FORECLOSURE ON KATHY J. GILLEN, DEFENDANT AT
RESIDENCE, 725 HILL ST., CURWENSVILLE, CLEARFIELD COUNTY,
PENNSYLVANIA BY HANDING TO KATHY J. GILLEN A TRUE AND ATTESTED COPY
OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN
TO HER THE CONTENTS THEREOF.
SERVED BY: DAVIS/MORGILLO

NOW SEPTEMBER 10, 2001 AT 9:47 AM DST SERVED THE WITHIN COMPLAINT
IN MORTGAGE FORECLOSURE ON RANDY GILLEN A/K/A RANDY L. GILLEN,
DEFENDANT AT RESIDENCE, 725 HILL ST., CURWENSVILLE, CLEARFIELD COUNTY,
PENNSYLVANIA BY HANDING TO KATHY GILLEN, WIFE, A TRUE AND ATTESTED
COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE
KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: DAVIS/MORGILLO

Return Costs

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

FILED

SEP 14 2001


01302210m
William A. Shaw
Prothonotary

Sworn to Before Me This

14th Day Of September 2001


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

So Answers,


by Marilyn Hamr
Chester A. Hawkins
Sheriff

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee : COURT OF COMMON PLEAS
for the Registered Holders of : CIVIL DIVISION
Credit Suisse First Boston : Clearfield County
Mortgage Securities Corp Home :
Equity Loan Trust 2000-HE1, : MORTGAGE FORECLOSURE
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PO Box 57038 :
Irvine, CA 92619-7038 :
Plaintiff :
v. :

Kathy J. Gillen : NO. 01-1444-CD
Randy Gillen a/k/a Randy L. :
Gillen :
725 Hill Street :
Curwensville, PA 16833 :
Defendant(s) :

FILED

OCT 18 2001

William A. Shaw
Prothonotary

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

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against the 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	\$60,994.84
Interest @11.35% Per Complaint	976.41
From 8/21/01 to 10/16/01	
Late charges per Complaint	64.84
From 8/21/01 to 10/16/01	

TOTAL \$62,036.09

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

MARK J. UDREN & ASSOCIATES

Mark J. Udren, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: 10-18-01

PRO PROTHY

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee	:	COURT OF COMMON PLEAS
for the Registered Holders of	:	CIVIL DIVISION
Credit Suisse First Boston	:	Clearfield County
Mortgage Securities Corp Home	:	
Equity Loan Trust 2000-HE1,	:	MORTGAGE FORECLOSURE
Home Equity Loan Pass -	:	
Through Certificates, Series	:	
2000-HE1	:	NO. 01-1444-CD
PO Box 57038	:	
Irvine, CA 92619-7038	:	
Plaintiff	:	
	:	
v.	:	
Kathy J. Gillen	:	
Randy Gillen a/k/a Randy L.	:	
Gillen	:	
725 Hill Street	:	
Curwensville, PA 16833	:	
Defendant(s)	:	

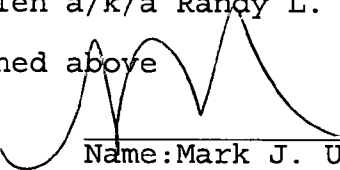
AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF NEW JERSEY :
COUNTY OF CAMDEN : SS

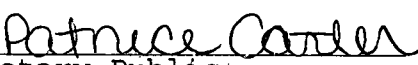
THE UNDERSIGNED being duly sworn, deposes and says that the averments herein are based upon investigations made and records maintained by us either as Plaintiff or as servicing agent of the Plaintiff herein and that the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended, and that the age and last known residence and employment of each Defendant are as follows:

Defendant: Kathy J. Gillen
Age: Over 18
Residence: As captioned above
Employment: Unknown

Defendant: Randy Gillen a/k/a Randy L. Gillen
Age: Over 18
Residence: As captioned above
Employment: Unknown


Name: Mark J. Udren, Esquire
Title: Attorney for Plaintiff
Company: Mark J. Udren & Associates

Sworn to and subscribed
before me this 16th day
of October 12th, 2001.


Notary Public
A Notary Public of New Jersey
My Commission Expires 8/20/2003

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee for the
Registered Holders of Credit Suisse First
Boston Mortgage Securities Corp Home Equity
Loan Trust 2000-HE1, Home Equity Loan Pass
- Through Certificates, Series 2000-HE1
PO Box 57038
Irvine, CA 92619-7038
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

v.

Kathy J. Gillen
Randy Gillen a/k/a Randy L. Gillen
725 Hill Street
Curwensville, PA 16833
Defendant(s)

NO. 01-1444-CD

DATED: October 3, 2001
TO: Randy Gillen a/k/a Randy L. Gillen
725 Hill Street
Curwensville, PA 16833

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERRAL SERVICE
Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O.Box 186
Harrisburg, PA 17108
800-932-0311
717-238-6715
Email: info@pabar.org
Internet: www.pabar.org

NOTIFICACION IMPORTANTE

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUIRIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO IMMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

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PO Box 57038
Irvine, CA 92619-7038
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

v.

Kathy J. Gillen
Randy Gillen a/k/a Randy L. Gillen
725 Hill Street
Curwensville, PA 16833
Defendant(s)

NO. 01-1444-CD

DATED: October 3, 2001
TO: Kathy J. Gillen
725 Hill Street
Curwensville, PA 16833

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MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee : COURT OF COMMON PLEAS
for the Registered Holders of : CIVIL DIVISION
Credit Suisse First Boston : Clearfield County
Mortgage Securities Corp Home :
Equity Loan Trust 2000-HE1, : MORTGAGE FORECLOSURE
Home Equity Loan Pass - :
Through Certificates, Series :
2000-HE1 :
PO Box 57038 :
Irvine, CA 92619-7038 :

Plaintiff

v.

Kathy J. Gillen :
Randy Gillen a/k/a Randy L. : NO. 01-1444-CD
Gillen :
725 Hill Street :
Curwensville, PA 16833 :

Defendant(s)

TO: Randy Gillen a/k/a Randy L. Gillen
725 Hill Street
Curwensville, PA 16833

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Prothonotary

☒ Judgment by Default
☐ Money Judgment
☐ Judgment in Replevin
☐ Judgment for Possession
☐ Judgment on Award of Arbitration
☐ Judgment on Verdict
☐ Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-482-6900

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee	:	COURT OF COMMON PLEAS
for the Registered Holders of	:	CIVIL DIVISION
Credit Suisse First Boston	:	Clearfield County
Mortgage Securities Corp Home	:	
Equity Loan Trust 2000-HE1,	:	MORTGAGE FORECLOSURE
Home Equity Loan Pass -	:	
Through Certificates, Series	:	
2000-HE1	:	
PO Box 57038	:	
Irvine, CA 92619-7038	:	
Plaintiff	:	
v.	:	
Kathy J. Gillen	:	NO. 01-1444-CD
Randy Gillen a/k/a Randy L.	:	
Gillen	:	
725 Hill Street	:	
Curwensville, PA 16833	:	
Defendant(s)	:	

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

TO THE PROTHONOTARY:

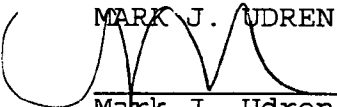
Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$60,994.84
Interest @11.35% Per Complaint	976.41
From 8/21/01 to 10/16/01	
Late charges per Complaint	64.84
From 8/21/01 to 10/16/01	

TOTAL \$62,036.09

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

MARK J. UDREN & ASSOCIATES


Mark J. Udren, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED 

DATE: 10.18.01

PRO PROTHY

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee : COURT OF COMMON PLEAS
for the Registered Holders of : CIVIL DIVISION
Credit Suisse First Boston : Clearfield County
Mortgage Securities Corp Home :
Equity Loan Trust 2000-HE1, : MORTGAGE FORECLOSURE
Home Equity Loan Pass - :
Through Certificates, Series :
2000-HE1 :
PO Box 57038 :
Irvine, CA 92619-7038 :

Plaintiff

v.

Kathy J. Gillen : NO. 01-1444-CD
Randy Gillen a/k/a Randy L. :
Gillen :
725 Hill Street :
Curwensville, PA 16833 :

Defendant(s)

TO: Kathy J. Gillen
725 Hill Street
Curwensville, PA 16833

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Prothonotary

☒ Judgment by Default
☐ Money Judgment
☐ Judgment in Replevin
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☐ Judgment on Award of Arbitration
☐ Judgment on Verdict
☐ Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-482-6900

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee	:	COURT OF COMMON PLEAS
for the Registered Holders of	:	CIVIL DIVISION
Credit Suisse First Boston	:	Clearfield County
Mortgage Securities Corp Home	:	
Equity Loan Trust 2000-HE1,	:	MORTGAGE FORECLOSURE
Home Equity Loan Pass -	:	
Through Certificates, Series	:	
2000-HE1	:	
PO Box 57038	:	
Irvine, CA 92619-7038	:	
Plaintiff	:	
v.	:	
Kathy J. Gillen	:	NO. 01-1444-CD
Randy Gillen a/k/a Randy L.	:	
Gillen	:	
725 Hill Street	:	
Curwensville, PA 16833	:	
Defendant(s)	:	

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

TO THE PROTHONOTARY:


Kindly enter judgment in favor of the Plaintiff and against the 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	\$60,994.84
Interest @11.35% Per Complaint	976.41
From 8/21/01 to 10/16/01	
Late charges per Complaint	64.84
From 8/21/01 to 10/16/01	

TOTAL \$62,036.09

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

MARK J. UDREN & ASSOCIATES


Mark J. Udren, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: 10-18-01


PRO PROTHY

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

National City Bank
Plaintiff(s)

No.: 2001-01444-CD

Real Debt: \$62,036.09

Atty's Comm:

Vs.

Costs: \$

Int. From:

Kathy J. Gillen
Randy Gillen
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 18, 2001

Expires: October 18, 2006

Certified from the record this 18th 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 18 2001

12:41 PM
William A. Shaw
Prothonotary

~~**FILED**~~

~~OCT 18 2001~~

Statement to
Atty. Widen

Atty. Widen pd. 20.00

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee
for the Registered Holders of
Credit Suisse First Boston
Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1,
Home Equity Loan Pass -
Through Certificates, Series
2000-HE1
PO Box 57038
Irvine, CA 92619-7038

Plaintiff

v.

Kathy J. Gillen
Randy Gillen a/k/a Randy L.
Gillen
725 Hill Street
Curwensville, PA 16833

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

NO. 01-1444-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE SHERIFF:

Issue Writ of Execution in the above matter:

Amount due

\$62,036.09

Interest From 10/17/01
to Date of Sale
Per diem @\$17.13

(Costs to be added)

\$ 120.00

FILED

OCT 18 2001

William A. Shaw
Prothonotary

MARK J. UDREN & ASSOCIATES

Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

FILED

OCT 18 2001
MAGALATHA
William A. Shaw
Prothonotary

Verden
PO \$20.00
Le Witts Shirts

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
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CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

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for the Registered Holders of
Credit Suisse First Boston
Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1,
Home Equity Loan Pass -
Through Certificates, Series
2000-HE1
PO Box 57038
Irvine, CA 92619-7038
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

Kathy J. Gillen
Randy Gillen a/k/a Randy L.
Gillen
725 Hill Street
Curwensville, PA 16833
Defendant(s)

NO. 01-1444-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

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

725 Hill Street
Curwensville, PA 16833
SEE LEGAL DESCRIPTION ATTACHED

Amount due

\$62,036.09

Interest From 10/17/01
to Date of Sale
Per diem @\$17.13

(Costs to be added)

\$ 120.00

By

Prothonotary


Clerk

Date

10.18.01

ALL THAT CERTAIN LOT, PIECE OR PARCEL OF GROUND SITUATE, LYING AND BEING IN THE BOROUGH OF CURWENSVILLE, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, MORE FULLY BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POST ON HILL STREET AND CORNER OF FIFTEEN (15) FOOT ALLEY, AND BEING THE SOUTHWEST CORNER OF LOT HEREBY CONVEYED; THENCE ALONG HILL STREET NORTH SIXTY-THREE (63) DEGREES THIRTY (30) MINUTES EAST FIFTY (50) FEET TO A POST AND CORNER OF LOT CONVEYED TO ROY BLOOM; THENCE ALONG SAID LOT SOUTH TWENTY-SIX (26) DEGREES THIRTY (30) MINUTES EAST, ONE HUNDRED AND EIGHTY (180) FEET TO POST ON ALLEY AT REAR OF LOT; THENCE ALONG SAID ALLEY SOUTH SIXTY-THREE (63) DEGREES THIRTY (30) MINUTES WEST, FIFTY (50) FEET TO POST AND CORNER OF FIRST ABOVE NAMED ALLEY; THENCE ALONG SAID ALLEY NORTH TWENTY-SIX (26) DEGREES THIRTY (30) MINUTES WEST, ONE HUNDRED EIGHTY (180) FEET TO POST AND PLACE OF BEGINNING, BEING A LOT FRONTING FIFTY (50) FEET ON HILL STREET AND EXTENDING BACK ONE HUNDRED EIGHTY (180) FEET TO AN ALLEY, AND BEING LOT NO. 217 IN THE PLAN OF LOTS OF SOUTH CURWENSVILLE.

UNDER AND SUBJECT TO ALL EXCEPTIONS, RESERVATIONS, RESTRICTIONS, CONDITIONS, EASEMENTS, RIGHTS AND RIGHTS OF WAY AS CONTAINED IN PRIOR DEEDS AND INSTRUMENTS OF RECORD.

BEING KNOWN AS 725 Hill Street, Curwensville, PA 16833

PROPERTY ID NO. 5.2-H10-294-67

TITLE TO SAID PREMISES IS VESTED IN KATHY J. GILLEN AND RANDY GILLEN A/K/A RANDY L. GILLEN, HUSBAND AND WIFE BY DEED FROM KATHY J. COLLINS, NOW KNOWN AS KATHY J. GILLEN, DATED 9/12/00, RECORDED 9/14/00, INSTRUMENT NO. 200013655

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

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Equity Loan Trust 2000-HE1,
Home Equity Loan Pass -
Through Certificates, Series
2000-HE1

Plaintiff

v.

Kathy J. Gillen
Randy Gillen a/k/a Randy L.
Gillen

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

FILED

FEB 07 2002

NO. 01-1444-CD

William A. Shaw
Prothonotary

ORDER

AND NOW, this 7th day of February, 2002,
after consideration of Plaintiff's Motion For Leave To Amend The
Complaint In Mortgage Foreclosure filed in this matter, and any
response thereto, it is hereby **ORDERED** that the Plaintiff is
granted leave to amend its Complaint In Mortgage Foreclosure by
adding Curwensville Gospel Tabernacle of the Christian and
Missionary Alliance, Real Owner as a Defendant.

It is further **ORDERED** that the Complaint, except as so
amended, shall in all other respects, remain unchanged and as filed
and therefore, no additional and/or new Answer/or "otherwise plead"
period shall be allowed; the case shall continue to proceed as if
the Complaint, as so amended, was the original Complaint.

BY THE COURT:

J.

FILED

19:16
FEB 07 2002

William A. Shaw
Prothonotary

2cc
Atty Udren

3/24

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee
for the Registered Holders of
Credit Suisse First Boston
Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1,
Home Equity Loan Pass -
Through Certificates, Series
2000-HE1

Plaintiff

v.

Kathy J. Gillen
Randy Gillen
a/k/a Randy L. Gillen
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

FILED

FEB 06 2002

William A. Shaw
Prothonotary

NO. 01-1444-CD

MOTION FOR LEAVE TO AMEND CIVIL ACTION COMPLAINT
IN MORTGAGE FORECLOSURE

Plaintiff, National City Bank, as Trustee for the Registered Holders of Credit Suisse First Boston Mortgage Securities Corp Home Equity Loan Trust 2000-HE1, Home Equity Loan Pass - Through Certificates, Series 2000-HE1, by its Attorney, Mark J. Udren, Esquire, respectfully requests this Honorable Court to enter an Order granting Plaintiff leave to amend its Complaint in the above captioned matter for the following reasons:


1. The Complaint in the herein matter was filed on September 4, 2001.
2. Since the filing of the Complaint, Plaintiff has learned that Curwensville Gospel Tabernacle of the Christian and Missionary Alliance is an owner of the real property located at 725 Hill Street, Curwensville, PA 16833 by Deed recorded on 10/2/01, with the Recorder of Deeds Office, Clearfield County, Instrument No. 200115685. A true and correct copy of the Deed is attached hereto as Exhibit "A".

3. Plaintiff seeks to amend the Complaint by adding Curwensville Gospel Tabernacle of the Christian and Missionary Alliance as a Defendant pursuant to Pa.R.C.P. 1144(a)(3).

4. All other averments of the Complaint are to remain the same and unchanged.

WHEREFORE, the Plaintiff respectfully prays and requests that this Honorable Court grant the Plaintiff leave to amend its Complaint as averred hereinabove. Furthermore, Plaintiff also requests that no additional and/or new Answer /or "otherwise plead" period shall be allowed, and the case shall continue to proceed as if the Complaint, as so amended, was the original Complaint. Furthermore, to not expand the Answer and/or otherwise plead time period as to the existing Defendant(s).

Respectfully submitted,
MARK J. UDREN & ASSOCIATES

BY: 
Mark J. Udren, Esquire
Attorney for Plaintiff/Movant

AFFIDAVIT No. 34670

Quit Claim Deed

THIS DEED

MADE the 8th day of February, in the year two thousand one (2001)And Randy L. Gillen - Husband & wife
BETWEEN KATHY J. COLLINS, 1 of 725 Hill St., Curwensville, Clearfield Co.,
Penn.; hereinafter referred to as GRANTOR

A

N

D

The CURWENSVILLE GOSPEL TABERNACLE of the CHRISTIAN and
MISSIONARY ALLIANCE (incorporated as a non-profit organization
May 11, 1938) of 803 Susquehanna Avenue, Curwensville,
Clearfield County, Pennsylvania, 16833, hereinafter referred to
as GRANTEE.

WITNESSETH, That in consideration of the sum of ONE (\$1.00)----
-----DOLLAR,

in hand paid, the receipt whereof is hereby acknowledged, the
said Grantor does hereby release and quit claim to the said
Grantee, its successors and assigns,

ALL the Grantor's right, title and interest in and to an
unopened portion of Linden Street located between Lots No. 125
and 126 in an unrecorded Plan of Lots known as the Addition to
Curwensville Borough on land of E.A. Irvin Estate, dated
August, 1922, approximately twenty (20) feet in width and
extending approximately two hundred feet, more or less, from
the line of Susquehanna Avenue to the line of land now or
formerly of Joseph S. Ammerman.

The purpose of this deed is to extinguish any rights,
including, but not limited to, a private right of easement,

EXHIBIT A

which the Grantor may have acquired in and to the above portion of Linden Street as an owner of land in the said Plan of Lots.

IN WITNESS WHEREOF, said Grantor has hereunto set his hand and seal, the day and year first above written.

Sealed and delivered in the presence of:

Jeffery D. Bellone

Kathy J. Collins Kathy J. Heller
Kathy J. Collins

Jeffery D. Bellone

Randy L. Gillen
Randy L. Gillen

CERTIFICATE OF RESIDENCE

I hereby certify that the precise residence of the Grantees herein is as follows:

803 Susquehanna Avenue
Curwensville, PA 16833

Lawrence B. Seaman Jr.
Attorney or Agent for Grantees

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF *Clearfield*:
:
: SS:On this, the *8th* day of *February*2001
AKA *Kathy*before me, the undersigned officer, personally appeared KATHY
*J. Gillen And Randy L. Gillen - Husband + wife*J. COLLINS, known to me (or satisfactorily proven) to be the

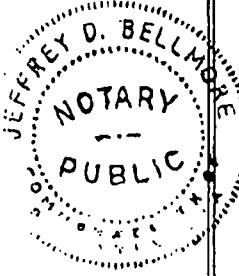
person whose name is subscribed to the within instrument, and

acknowledged that she executed the same for the purpose therein
contained.

IN WITNESS WHEREOF, I have hereunto set my hand and

seal.

My Commission Expires:


*Jeffrey D Bellmore*KAREN L. STARCK
REGISTER AND RECORDER
CLEARFIELD COUNTY
Pennsylvania

INSTRUMENT NUMBER

200115685

RECORDED ON

Oct 02, 2001

3:11:53 PM

Total Pages: 3

RECORDING FEES - \$13.00

RECORDER

COUNTY IMPROVEMENT \$1.00

FUND

RECORDER \$1.00

IMPROVEMENT FUND

STATE WRIT TAX \$0.50

TOTAL \$15.50

CUSTOMER

GATES & SEAMAN

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO.
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee
for the Registered Holders of
Credit Suisse First Boston
Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1,
Home Equity Loan Pass -
Through Certificates, Series
2000-HE1

Plaintiff

v.

Kathy J. Gillen
Randy Gillen a/k/a Randy L.
Gillen

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 01-1444-CD

BRIEF IN SUPPORT OF PLAINTIFF'S
MOTION TO AMEND COMPLAINT

Plaintiff seeks leave of Court to amend its Complaint as averred in the within Motion. The Pennsylvania Rules Of Civil Procedure allow for such amendment. The facts as set forth in the within Motion are incorporated herein by reference as though fully set forth at length.

Pa.R.C.P. 1033, AMENDMENT:

A party, ... by leave of court, may at any time change the form of action, correct the name of a party or amend his pleading. The amended pleading may aver transactions or occurrences which have happened before or after the filing of the original pleading, even though they give rise to a new cause of action or defense. An amendment may be made to conform the pleading to the evidence offered or admitted.

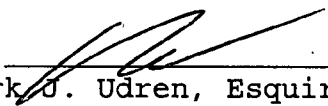
Pa.R.C.P. 1144. PARTIES. RELEASE OF LIABILITY, in relevant part, states:

- (a) The plaintiff shall name as defendants
 - (1) the mortgagor;
 - (2) the personal representative, heir or devisee of a deceased mortgagor, if known; and
 - (3) the real owner of the property, or if he is unknown, the grantee in the last recorded deed.

In the instant Motion for Leave to Amend, Plaintiff requests leave of Court to Amend its pleading to add Curwensville Gospel Tabernacle of the Christian and Missionary Alliance as a Defendant pursuant to Pa.R.C.P. 1144(a)(3). This Motion falls strictly within the parameters of Rule 1033 and 1144.

Pursuant to the Rules of Civil Procedure as above stated and the facts as set forth in the attached Motion, Plaintiff believes that the Complaint should be so amended. The Plaintiff is not requesting leave of Court to amend any allegations or substantive fact contained in the pleading itself. Furthermore, Plaintiff also requests that the Amended Complaint not expand the Answer and/or otherwise plead period as initially established in the original complaint.

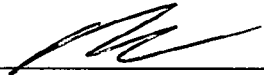
Respectfully submitted,
MARK J. UDREN & ASSOCIATES

By: 
Mark J. Udren, Esquire
Attorney for Plaintiff/Movant

VERIFICATION

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff in this action, that he is authorized to make this Verification, and that the statements made in the foregoing Motion For Leave To Amend Complaint and Brief in Support 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. Section 4904 relating to unsworn falsification to authorities.

MARK J. UDREN & ASSOCIATES

By: 
Mark J. Udren, Esquire
Attorney for Plaintiff/Movant

Dated: 2/4/02

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO.
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee
for the Registered Holders of
Credit Suisse First Boston
Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1,
Home Equity Loan Pass -
Through Certificates, Series
2000-HE1

Plaintiff

v.

Kathy J. Gillen
Randy Gillen a/k/a Randy L.
Gillen

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 01-1444-CD

CERTIFICATE OF SERVICE

I, Mark J. Udren, Esquire, hereby certify that I have served true and correct copies of the Plaintiff's Motion For Leave To Amend Complaint and Brief in Support upon the following person(s) named herein at their last known address or their attorney of record.

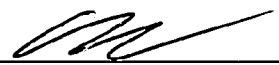
_____ Regular First Class Mail
_____ Certified Mail
_____ Other (certificate of mailing)

Date Served: February 4, 2002

TO: Kathy J. Gillen
Randy Gillen
a/k/a Randy L. Gillen
725 Hill Street
Curwensville, PA 16833

Curwensville Gospel Tabernacle
of the Christian and Missionary
Alliance
803 Susquehanna Avenue
Curwensville, PA 16833

MARK J. UDREN & ASSOCIATES

By: 
Mark J. Udren, Esquire
Attorney for Plaintiff/Movant

FILED

FEB 06 2002

mja30/noc

William A. Shaw
Prothonotary



MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee
for the Registered Holders of
Credit Suisse First Boston
Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1,
Home Equity Loan Pass -
Through Certificates, Series
2000-HE1
PO Box 57038
Irvine, CA 92619-7038
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

Kathy J. Gillen
Randy Gillen a/k/a Randy L.
Gillen
725 Hill Street
Curwensville, PA 16833
Defendant(s)

NO. 01-1444-CD

FILED

FEB 21 2002
11:14 AM
William A. Shaw
Prothonotary

AFFIDAVIT OF SERVICE PURSUANT TO Pa.R.C.P.RULE 3129.1

Plaintiff, by its/his/her Attorney, Mark J. Udren, Esquire, hereby verifies that:

1. A copy of the Notice of Sheriff's Sale, a true and correct copy of which is attached hereto as Exhibit "A", was sent to every recorded lienholder and every other interested party known as of the date of the filing of the Praecipe for the Writ of Execution, on the date(s) appearing on the attached Certificates of Mailing.

2. A Notice of Sheriff's Sale was sent to Defendant(s) by regular mail and certified mail on the date appearing on the attached Return Receipt, which was signed for by Defendant(s) on the date specified on the said Return Receipt. Copies of the said Notice and Return Receipt are attached hereto as Exhibit "B".

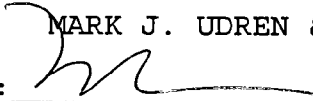
3. If a Return Receipt is not attached hereto, then service was by personal service on the date specified on the attached Return of Service, attached hereto as Exhibit "B".

4. If service was by Order of Court, then proof of compliance with said Order is attached hereto as Exhibit "B".

All Notices were served within the time limits set forth by Pa Rule C.P. 3129.

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

Dated: February 19, 2002

BY: 
Mark J. Udren, Esquire
Attorney for Plaintiff

MARK J. UDREN & ASSOCIATES

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee	:	COURT OF COMMON PLEAS
for the Registered Holders of	:	CIVIL DIVISION
Credit Suisse First Boston	:	Clearfield County
Mortgage Securities Corp Home	:	
Equity Loan Trust 2000-HE1,	:	MORTGAGE FORECLOSURE
Home Equity Loan Pass -	:	
Through Certificates, Series	:	
2000-HE1	:	
PO Box 57038	:	
Irvine, CA 92619-7038	:	
Plaintiff	:	
v.	:	
Kathy J. Gillen	:	NO. 01-1444-CD
Randy Gillen a/k/a Randy L.	:	
Gillen	:	
725 Hill Street	:	
Curwensville, PA 16833	:	
Defendant(s)	:	

AMENDED AFFIDAVIT PURSUANT TO RULE 3129.1

National City Bank, as Trustee for the Registered Holders of Credit Suisse First Boston Mortgage Securities Corp Home Equity Loan Trust 2000-HE1, Home Equity Loan Pass - Through Certificates, Series 2000-HE1, Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at: 725 Hill Street, Curwensville, PA 16833

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

Kathy J. Gillen	725 Hill Street, Curwensville, PA 16833
Randy Gillen	725 Hill Street, Curwensville, PA 16833
a/k/a Randy L. Gillen	

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

SAME AS NO.1 ABOVE

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

NONE

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

Name

Address

Plaintiff herein.

See Caption above.

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

Name

Address

Curwensville Gospel Tabernacle
of the Christian And Missionary
Alliance

808 Susquehanna Ave.
Curwensville, PA 16833

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

Real Estate Tax Dept.

230 E. Market St., Clearfield, PA 16830

Domestic Relations Section

230 E. Market St., Clearfield, PA 16830

Commonwealth of PA,
Department of Revenue

Bureau of Compliance, Dept. 280946
Harrisburg, PA 17128-0946

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

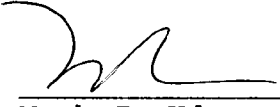
Tenants/Occupants

725 Hill Street, Curwensville, PA 16833

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. sec. 4904 relating to unsworn falsification to authorities.

MARK J. UDREN & ASSOCIATES

DATED: February 19, 2002



Mark J. Udren, ESQ.
Attorney for Plaintiff

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee
for the Registered Holders of
Credit Suisse First Boston
Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1, Home
Equity Loan Pass - Through
Certificates, Series 2000-HE1
PO Box 57038
Irvine, CA 92619-7038
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 01-1444-CD

v.

Kathy J. Gillen
Randy Gillen a/k/a Randy L.
Gillen
725 Hill Street
Curwensville, PA 16833
Defendant(s)

DATE: February 19, 2002

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

NOTICE OF SHERIFF'S SALE
OF REAL PROPERTY

OWNER(S): Kathy J. Gillen & Randy Gillen a/k/a Randy L. Gillen

PROPERTY: 725 Hill Street, Curwensville, PA 16833

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on March 1, 2002, at 10:00 AM, at the Clearfield County Courthouse, 1 North Second Street, Suite 116, Clearfield, PA 16830. Our records indicate that you may hold a mortgage or judgment on the property which will be extinguished by the sale. You may wish to attend the sale to protect your interests.

A Schedule of Distribution will be filed by the Sheriff on a date specified by the Sheriff not later than 30 days after sale. Distribution will be made in accordance with the schedule unless exceptions are filed thereto within 10 days after the filing of the schedule.

EXHIBIT A

Name and Address Of Sender
LAW OFFICES
MARK J. UDREN & ASSOCIATES
1040 N. KINGS HIGHWAY SUITE 500
CHERRY HILL, NJ 08034

☐ Registered
☐ Insured
☐ COD
☐ Certified
☐ Return Receipt for Merchandise
☐ Int'l Recorded Del.
☐ Express Mail

Check appropriate block for Registered Mail:
☐ With Postal Insurance
☐ Without postal insurance

Affix stamp here if issued as certificate of mailing or for additional copies of this bill.

Postmark and Date of Receipt

EXHIBIT A

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge	Act. Value (if Regis.)	Insured Value	Due Sender If COD	R.R. Fee	S.D. Fee	S.H. Fee	Rst. Del. Fee	Remarks
1	GILLEN	REAL ESTATE TAX DEPT 230 E. MARKET STREET CLEARFIELD, PA 16830											
2	0127372	DOMESTIC RELATIONS SECTION 230 E. MARKET STREET CLEARFIELD, PA 16830											
3	ALICE D	COM OF PA DEPT OF REV BUREAU OF COMPLIANCE DEPT 280946 HARRISBURG, PA 17128-0946											
4		TENANTS/OCCUPANTS 725 HILL STREET CURWENSVILLE, PA 16833											
5	CLEARFIE LD												
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													
Total number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)		The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R800, S813, and S821 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to third and fourth class parcels.								

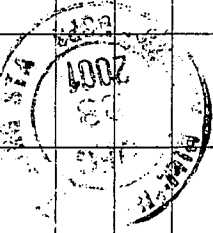
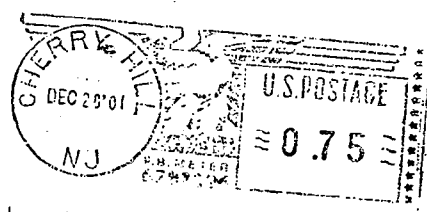
EXHIBIT A

Name and Address of Addressee
MARK J. UDREN & ASSOCIATES
1040 N. KINGS HIGHWAY
SUITE 500
CHERRY HILL, NJ 08034

Check type of mail or service:
☐ Certified
☐ COD
☐ Delivery Confirmation
☐ Express Mail
☐ Insured
☐ Recorded Delivery (International)
☐ Registered
☐ Return Receipt for Merchandise
☐ Signature Confirmation

Affix Stamp Here
(If issued as a certificate of mailing, or for additional copies of this bill)
Postmark and Date of Receipt

Line	Article Number	Addressee Name, Street, and PO Address	Postage	Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	DC Fee	SC Fee	SH Fee	RD Fee	RR Fee
1	Curmenseville Gospel	POB Susquehanna Ave											
2	Curmenseville Missionary	Curmenseville, PA 16833											
3	Alliance												
4													
5													
6													
7													
8													
9													
10													
11													
12	Gillen												
13													
14	Cleasfield												
15													
Total Number of Pieces		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$500 per piece subject to additional limitations for multiple pieces lost or damaged in a single catastrophic occurrence. The maximum indemnity payable on Express Mail merchandise insurance is \$500, but optional Express Mail Service merchandise insurance is available for up to \$5,000 to some, but not all countries. The maximum indemnity payable is \$25,000 for registered mail. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.									
List of Sender													



Delivery Confirmation
Signature Confirmation
Special Handling
Restricted Delivery
Return Receipt

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11668

NATIONAL CITY BANK ET AL

01-1444-CD

VS.

GREEN, KATHY J.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

FILED

APR 16 2002

0/9:05

William A. Shaw
Prothonotary

Sworn to Before Me This

16th Day Of April 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 Margaret H. Pratt

Chester A. Hawkins

Sheriff

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1049 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Bank, as Trustee
for the Registered Holders of
Credit Suisse First Boston
Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1,
Home Equity Loan Pass -
Through Certificates, Series
2000-HE1
PO Box 57038
Irvine, CA 92619-7038
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

v.

Kathy J. Gillen
Randy Gillen a/k/a Randy L.
Gillen
725 Hill Street
Curwensville, PA 16833
Defendant(s)

NO. 01-1444-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

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

725 Hill Street
Curwensville, PA 16833
SEE LEGAL DESCRIPTION ATTACHED

Amount due

\$62,036.09

Interest From 10/17/01
to Date of Sale
Per diem @\$17.13

(Costs to be added)

\$ 120.00

RECEIVED OCT 19 2001

@ 3:23 PM

Chester A. Hawkins
by Margaret H. Pitt

By

Prothonotary

Clerk

Date

10-18-01

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11668

NATIONAL CITY BANK ET AL

01-1444-CD

VS.

GILLEN, KATHY J.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

NOW, DECEMBER 4, 2001, AT 10:05 AM O'CLOCK A LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDANTS. PROPERTY WAS POSTED THIS DATE.

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

NOW, DECEMBER 24, 2001, MAILED WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY BY REGULAR AND CERTIFIED MAIL, #7001 0320 0001 9788 7216, RANDY GILLEN, A/K/A RANDY L. GILLEN, AND CERTIFIED MAIL #7001 0320 0001 9788 7209, KATHY J. GILLEN, AT THE ADDRESS OF 725 HILL STREE, CURWENSVILLE, PENNSYLVANIA, 16833.

NOW, JANUARY 8, 2002, RECEIVED FAX FROM MARK UDREN, ATTORNEY FOR PLAINTIFF THAT SALE IS TO BE POSTPONED UNTIL FRIDAY, MARCH 1, 2002, AT 10:00 AM, DUE TO A POSSIBLE REPAYMENT PLAN.

NOW, JANUARY 9, 2002, RECEIVED FAX FROM MARK UDREN, ATTORNEY FOR PLAINTIFF, THAT DEFENDANTS ARE TO BE SERVED WITH NEW NOTICE OF SALE.

NOW, JANUARY 12, 2002, RECEIVED CERTIFIED MAIL #7001 0320 0001 9788, RANDY GILLEN, A/K/A RANDY L. GILLEN AND CERTIFIED MAIL #7001 0320 0001 9788 7216, KATHY J. GILLEN, STAMPED UNCLAIMED.

NOW, JANUARY 12, 2002, RECEIVED LETTER FROM MARK UDREN, ATTORNEY FOR PLAINTIFF THAT SALE IS TO BE POSTPONED UNTIL FRIDAY, MARCH 1, 2002, AT 10:00 AM.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11668

NATIONAL CITY BANK ET AL

01-1444-CD

VS.

GILLEN, KATHY J.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

NOW, JANUARY 14, 2002, AT 9:50 AM O'CLOCK POSTED THE PROPERTY OF DEFENDANTS WITH NEW NOTICE OF SALE.

NOW, JANUARY 14, 2002, AT 10:30 AM O'CLOCK SERVED NEW NOTICE OF SALE TO KATHY J. GILLEN, DEFENDANT, AT HER PLACE OF RESIDENCE, 725 HILL STREET, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, 16833, BY HANDING TO KATHY J. GILLEN, DEFENDANT, A COPY OF THE NEW NOTICE OF SALE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

NOW, JANUARY 14, 2002, AT 10:30 AM O'CLOCK SERVED NEW NOTICE OF SALE TO KATHY J. GILLEN, WIFE OF RANDY GILLEN, DEFENDANT, AT HER PLACE OF RESIDENCE, 725 HILL STREET, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA, 16833, BY HANDING TO KATHY J. GILLEN, WIFE OF RANDY GILLEN, DEFENDANT, A COPY OF THE NEW NOTICE OF SALE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

NOW, FEBRUARY 26, 2002, RECEIVED FAX FROM MARK UDREN, ATTORNEY FOR PLAINTIFF, THAT SALE IS TO BE STAYED AS REPAYMENT PLAN HAS BEEN ENTERED, AMOUNT TO FOLLOW.

NOW, FEBRUARY 28, 2002, RECEIVED LETTER FROM MARK UDREN, ATTORNEY FOR PLAINTIFF, THAT SALE IS TO BE STAYED AS REPAYMENT PLAN HAS BEEN ENTERED, AMOUNT TO FOLLOW.

NOW, APRIL 15, 2002, RETURN WRIT AS NO SALE HELD, DEFENDANTS ENTERED REPAYMENT PLAN. PAID COSTS FROM ADVANCE AND MADE REFUND OF UNUSED ADVANCE TO ATTORNEY.

SHERIFF HAWKINS \$357.55

SURCHARGE \$ 20.00

PAID BY ATTORNEY

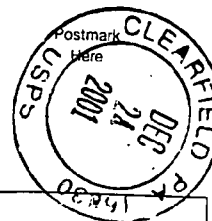
U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 9788 7209

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ <i>4.00</i>

Sent To
KATHY J. GILLEN
 Street, Apt. No.,
 or PO Box No. **725 HILL STREET**
 City, State, ZIP+4
CURWENSVILLE, PA 16833

PS Form 3800, January 2001 See Reverse for Instructions



CHESTER A. HAWKINS
SHERIFF
 COURTHOUSE
 1 NORTH SECOND STREET - SUITE 116
 CLEARFIELD, PENNSYLVANIA 16830

7001 0320 0001 9788 7209

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
 OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL



7001 0320 0001 9788 7209

KATHY J. GILLEN

725 Hill Street *undelivered*



- ☐ INSUFFICIENT ADDRESS
- ☐ ATTEMPTED NOT KNOWN
- ☐ NO SUCH NUMBER/ STREET
- ☐ NOT DELIVERABLE AS ADDRESSED
- ☐ - UNABLE TO FORWARD
- ☒ OTHER

12-26
12-31
1-10

A
C
S

16833-1311 -

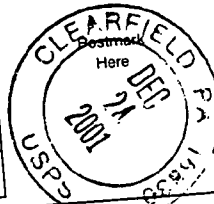
COPY

1-10-02

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

7001 0320 0001 9788 7216

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$4.17

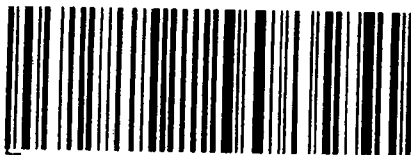


Sent To **RANDY GILLEN A/K/A RANDY L. GILLEN**
 Street, Apt. No., or PO Box No. **725 HILL STREET**
 City, State, ZIP+4 **CURWENSVILLE, PA 16833**
 PS Form 3800, January 2001 See Reverse for Instructions

7001 0320 0001 9788 7216

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL



7001 0320 0001 9788 7216

CHESTER A. HAWKINS
SHERIFF
 COURTHOUSE
 1 NORTH SECOND STREET - SUITE 116
 CLEARFIELD, PENNSYLVANIA 16830

RANDY GILLEN
A/K/A RANDY L. GILLEN
725 Hill Street
Curwensville, PA 16833

12-26
12-31
1-10

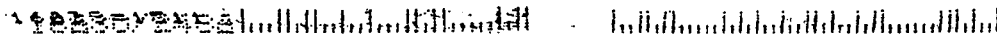
unclaimed



- ☐ INSUFFICIENT ADDRESS
- ☐ ATTEMPTED NOT KNOWN
- ☐ NO SUCH NUMBER/ STREET
- ☐ NOT DELIVERABLE AS ADDRESSED
- ☐ - UNABLE TO FORWARD
- ☒ OTHER

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COPY



LAW OFFICES
MARK J. UDREN & ASSOCIATES
1040 NORTH KINGS HIGHWAY
SUITE 500
CHERRY HILL, NEW JERSEY 08034
856 . 482 . 6900
FAX: 856 . 482 . 1199

MARK J. UDREN*
STUART WINNEG**
GAYL SPIVAK ORLOFF***
HEIDI R. SPIVAK***
CHRISTOPHER J. FOX***
CORINA CANIZ***
*ADMITTED NJ, PA, FL
**ADMITTED PA
***ADMITTED NJ, PA
TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PENNSYLVANIA OFFICE
24 NORTH MERION AVENUE
SUITE 240
BRYN MAWR, PA 19010
215-368-9500
215-368-1141 FAX

PLEASE RESPOND TO NEW JERSEY OFFICE

January 7, 2002

Sent via telefax #814-765-5915
and Regular Mail

Clearfield County Sheriff's Office
Clearfield County Courthouse
Clearfield, PA 16830
ATTN: Peggy

Re: National City Bank, as Trustee for the Registered Holders of
Credit Suisse First Boston Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1, Home Equity Loan Pass - Through
Certificates, Series 2000-HE1

vs.

Kathy J. Gillen
Randy Gillen a/k/a Randy L. Gillen
Clearfield County C.C.P. No. 01-1444-CD
Premises: 725 Hill Street , Curwensville, PA 16833
SS Date: February 1, 2002

Dear Peggy:

Please Postpone the Sheriff's Sale scheduled for February 1, 2002
to March 1, 2002.

Sale is Postponed for the following reason:

Due To A Possible Repayment Plan.

Thank you for your attention to this matter.

Sincerely yours,

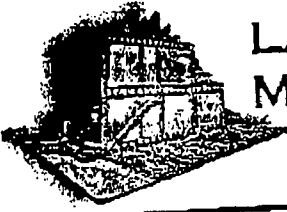


Mark J. Udren
MARK J. UDREN & ASSOCIATES
/atd

1 1 2002 09:00 AM

MARK J. UDREN & ASSOCIATES

1 1 2002 09:00 AM



**LAW OFFICES OF
MARK J. UDREN & ASSOCIATES**

1040 N. KINGS HIGHWAY SUITE 500 CHERRY HILL, NJ 08034
(856) 482-6900 VOICE (856) 482-1199 FAX

PENNSYLVANIA OFFICE
24 NORTH MERION AVE.
SUITE 240
BETH LEAH, PA. 19010
(215) 268-0000 VOICE
(215) 268-1141 FAX

PLEASE SEND ALL RESPONSES TO THE NEW JERSEY OFFICE

FREDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

Facsimile Transmittal

To: Peggy Fax: 814-765-5915
From: ALICE DICK Date: 1/9/02
Re: _____ Pages: 5
CC: _____

☐ Urgent

☐ For Review • ☐ Please Comment • ☐ Please Reply ☐ Please Recycle

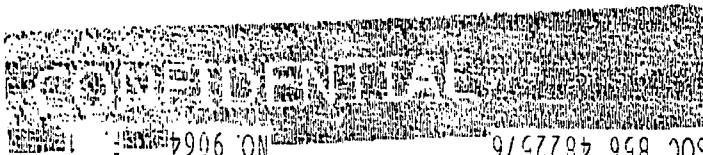


NOTE: Please Serve
With New
Notice of Sale

Thanks

Alice

COPY



MARK J UDREN & ASSOC 856 4822576

JAN 9 2002 10:34AM

LAW OFFICES
MARK J. UDREN & ASSOCIATES
1040 NORTH KINGS HIGHWAY
SUITE 500
CHERRY HILL, NEW JERSEY 08034
856 . 482 . 6900
FAX: 856 . 482 . 1199

MARK J. UDREN*
STUART WINNEG**
GAYL SPIVAK ORLOFF***
HEIDI R. SPIVAK***
CHRISTOPHER J. FOX***
CORINA CANIZ***
*ADMITTED NJ, PA, FL
**ADMITTED PA
***ADMITTED NJ, PA
TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PENNSYLVANIA OFFICE
~~24 NORTH MERTON AVENUE~~
SUITE 240
BRYN MAWR, PA 19010
215-568-9500
215-568-1141 FAX

PLEASE RESPOND TO NEW JERSEY OFFICE

January 7, 2002

Sent via telefax #814-765-5915
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Clearfield County Courthouse
Clearfield, PA 16830
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Credit Suisse First Boston Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1, Home Equity Loan Pass - Through
Certificates, Series 2000-HE1
vs.

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Randy Gillen a/k/a Randy L. Gillen
Clearfield County C.C.P. No. 01-1444-CD
Premises: 725 Hill Street , Curwensville, PA 16833
SS Date: February 1, 2002

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Due To A Possible Repayment Plan.

Thank you for your attention to this matter.

Sincerely yours,


Mark J. Udren
MARK J. UDREN & ASSOCIATES
/atd

*Rec'd
1-12-02*

LAW OFFICES
MARK J. UDREN & ASSOCIATES
1040 NORTH KINGS HIGHWAY
SUITE 500
CHERRY HILL, NEW JERSEY 08034

856 . 482 . 6900

FAX: 856 . 482 . 1199

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DESIGNATED COUNSEL

PENNSYLVANIA OFFICE
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SUITE 240
BRYN MAWR, PA 19010
215-568-9500
215-568-7741 FAX

PLEASE RESPOND TO NEW JERSEY OFFICE

February 26, 2002

Sent via telefax #1-814-765-5915
and Regular Mail

Clearfield County Sheriff's Office
Clearfield County Courthouse
200 E. Market St.
Clearfield, PA 16830
ATTN: Peggy

Re: National City Bank, as Trustee for the Registered Holders of
Credit Suisse First Boston Mortgage Securities Corp Home
Equity Loan Trust 2000-HE1, Home Equity Loan Pass - Through
Certificates, Series 2000-HE1

vs.

Kathy J. Gillen & Randy Gillen a/k/a Randy L. Gillen
Clearfield County C.C.P. No. 01-1444-CD
Premises: 725 Hill Street, Curwensville, PA 16833
SS Date: March 1, 2002 (Postponed From February 1, 2002)

Dear Peggy:

Please Stay the Sheriff's Sale scheduled for March 1, 2002 .

Sale is stayed for the following reason:

Due to a Repay plan. Amount to follow.

Thank you for your attention to this matter.

Sincerely yours,

Mark J. Udren
MARK J. UDREN & ASSOCIATES
/jrs

LAW OFFICES
MARK J. UDREN & ASSOCIATES
1040 NORTH KINGS HIGHWAY
SUITE 500
CHERRY HILL, NEW JERSEY 08034
856 . 482 . 6900
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TINA MARIE RICH
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FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PENNSYLVANIA OFFICE
~~24 NORTH MERION AVENUE~~
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BRYN MAWR, PA 19010
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Clearfield County Courthouse
200 E. Market St.
Clearfield, PA 16830
ATTN: Peggy

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Equity Loan Trust 2000-HE1, Home Equity Loan Pass - Through
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Thank you for your attention to this matter.

Sincerely yours,

Mark J. Udren
MARK J. UDREN & ASSOCIATES
/jrs

[Handwritten signature]

REAL ESTATE SALE

REAL ESTATE SALE SCHEDULE OF DISTRIBUTION

NOW, _____, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting 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		3.90
LEVY	15.00 +	15.00
MILEAGE		3.90
POSTING	15.00 +	15.00

CSDS		10.00
COMMISSION 2%	2.57 +	27.57
POSTAGE		4.08
HANDBILLS		15.00
DISTRIBUTION		25.00
ADVERTISING		15.00
ADD'L SERVICE		15.00
DEED		30.00
ADD'L POSTING		
ADD'L MILEAGE	35.00	
ADD'L LEVY		
BID AMOUNT		
RETURNS/DEPUTIZE		
COPIES / BILLING	\$15.00 + 2.00	
BILLING - PHONE - FAX	30.00	
1-7-02 3-30-02		
TOTAL SHERIFF COSTS	\$	357.55

DEED COSTS:

REGISTER & RECORDER	\$	15.00
ACKNOWLEDGEMENT		5.00
TRANSFER TAX 2%		

TOTAL DEED COSTS

DEBT & INTEREST:

DEBT-AMOUNT DUE	\$ 62,036.09
INTEREST FROM 10-23-01 TO SALE DATE @ \$17.13	TO BE ADDED
TOTAL DEBT & INTEREST	\$62,036.09

COSTS:

ATTORNEY FEES	\$	
PROTH. SATISFACTION	\$	
ADVERTISING	\$	302.90
LATE CHARGES & FEES	\$	
TAXES-Collector	\$	
TAXES-Tax Claim	\$	
COSTS OF SUIT-To Be Added	\$	
LIST OF LIENS AND MORTGAGE SEARCH	\$	140.00
FORCLOSURE FEES /ESCROW DEFICIT	\$	
ACKNOWLEDGEMENT	\$	
DEED COSTS	\$	
ATTORNEY COMMISSION	\$	
SHERIFF COSTS	\$	357.55
LEGAL JOURNAL AD	\$	94.50
REFUND OF ADVANCE	\$	
REFUND OF SURCHARGE	\$	
PROTHONOTARY	\$	120.00

TOTAL COSTS

\$ 894.99

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