

01-1483-CD  
WELLS FARGO BANK MINNESOTA, N.A. -vs- PAULINE E. PELTON

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

Wells Fargo Bank Minnesota,  
N.A., as Trustee for  
registered Holders of Option  
One Mortgage Loan Trust 2000-  
C, Asset-Backed Certificates,  
Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION

Clearfield County

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821  
Defendant(s)

NO. 01-1483-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

E-Mail: [info@pabar.org](mailto:info@pabar.org)  
Internet: [www.pabar.org](http://www.pabar.org)

**FILED**

SEP 06 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 asentar 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 dafiende, 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  
E-Mail: [info@pabar.org](mailto:info@pabar.org)  
Internet: [www.pabar.org](http://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 Corp.

Assignments of Record to: Wells Fargo Bank Minnesota, N.A., as Trustee for registered Holders of Option One Mortgage Loan Trust 2000-C, Asset-Backed Certificates, Series 2000-C

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: Old Turnpike Rd., Box 125

MUNICIPALITY/TOWNSHIP/BOROUGH: Township of Morris

COUNTY: Clearfield

DATE EXECUTED: 7/14/00

DATE RECORDED: 7/18/00 INSTR NO: 200010054

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.

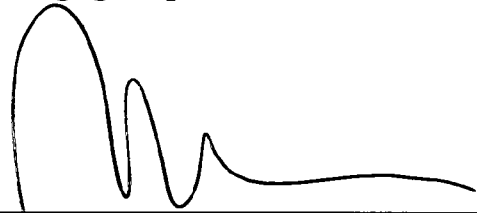
6. The following amounts are due on the said Mortgage as of 8/22/01:

Principal of debt due and unpaid	\$55,899.18
Interest at 13.24% from 4/1/01 to 8/22/01 (the per diem interest accruing on this debt is \$20.28 and that sum should be added each day after 8/22/01)	2,913.09
Title Report	250.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Escrow Overdraft/(Balance) (The monthly escrow on this account is \$0.00 and that sum should be added on the first of each month after 8/22/01)	0.00
Late Charges (monthly late charge of \$37.80 should be added on the fifteenth of each month after 8/22/01)	340.20
Other Fees	46.98
Penalty Interest	2,959.08
Attorneys Fees (anticipated and actual to 5% of principal)	2,794.96
TOTAL	\$65,483.49

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 \$65,483.49 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.

A handwritten signature in black ink, appearing to read 'Mark J. Udren', is written over a horizontal line.

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

ALL THAT CERTAIN LOT OR PIECE OF LAND SITUATE IN THE VILLAGE OF ALLPORT, TOWNSHIP OF MORRIS, COUNTY OF CLEARFIELD, AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT THE CENTER OF TOWNSHIP ROAD LEADING TO CENTER HILL; THENCE IN A NORTHERLY DIRECTION ALONG LANDS OWNED BY A.O. MYERS A DISTANCE OF TWO HUNDRED AND EIGHTY (280) FEET TO A CREEK; THENCE IN A WESTERLY DIRECTION ALONG LANDS OF A.O. MYERS A DISTANCE OF ONE HUNDRED AND EIGHTY (180) FEET TO A POST; THENCE IN A SOUTHERLY DIRECTION ALONG THE LINE OF LAND OF DOYLE BEVERIDGE A DISTANCE OF TWO HUNDRED AND EIGHTY (280) FEET TO THE SAID TOWNSHIP ROAD; THENCE IN AN EASTERLY DIRECTION ALONG THE LINE OF THE SAID TOWNSHIP ROAD A DISTANCE OF ONE HUNDRED AND EIGHTY (180) FEET TO THE PLACE OF BEGINNING.



NT-Verden

LOAN NO  
3480415

DATE  
07/05/01

LETTER  
OP171

VER  
012

REQ  
NS3

DESCRIPTION  
Part 1 Pennsylvania NOI

DATE 08/22/01

July 05, 2001

7099-3400-0017-5175-7601

Pauline E Pelton

Old Turnpike Rd Box 125  
Allport, PA 16821

Homeowners Name: Pauline E Pelton

Property Address: Old Turnpike Rd, Allport PA 16821  
Loan Account No.: 348041-5

PF: 1 SC F

**EXHIBIT A**

LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE
3480415	07/05/01	OP171	012	NS3	Part 1 Pennsylvania NOI	08/22/01

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:

PF: 1 SC F 2 SC B

LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE 08/22/01
3480415	07/05/01	OP171	012	NS3	Part 1 Pennsylvania NOI	

\* 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

PF: 1 SC F 2 SC B

LOAN NO  
3480415

DATE  
07/05/01

LETTER  
OP171

VER  
012

REQ  
NS3

DESCRIPTION  
Part 1 Pennsylvania NOI

DATE 08/22/01

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

PF: 1 SC F 2 SC B

LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE
3480415	07/05/01	OP171	012	NS3	Part 1 Pennsylvania NOI	08/22/01

Re: Loan No. 348041-5

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

PF: 1 SC F 2 SC B

LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE 08/22/01
3480415	07/05/01	OP171	012	NS3	Part 1 Pennsylvania NOI	

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

PF: 1 SC F 2 SC B

LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE
3480415	07/05/01	OP171	012	NS3	Part 1 Pennsylvania NOI	08/22/01

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

PF: 2 SC B

LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE 08/22/01
3480415	07/05/01	OP172	023	NS3	Part 2 Pennsylvania NOI	

Re: Loan No. 348041-5

\*\*\*\*\*  
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).

---

PF: 1 SC F



LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE
3480415	07/05/01	OP172	023	NS3	Part 2 Pennsylvania NOI	08/22/01

NATURE OF THE DEFAULT - The MORTGAGE debt held by the above lender on

your property located at:  
Old Turnpike Rd, Allport PA 16821

---

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: 1 MONTHS @ \$ 640.94  
2 MONTHS @ \$ 640.94

\$ 1,922.82

(b) Previous late charges;

---

\$ 264.60

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

---

\$ 00

(d) Other provisions of the mortgage obligation,

PF: 1 SC F 2 SC B

LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE 08/22/01
3480415	07/05/01	OP172	023	NS3	Part 2 Pennsylvania NOI	

if any \$ 00

(e) TOTAL AMOUNT OF (a) (b) and (c) REQUIRED AS OF THIS DATE	\$ 2,188.40
---	-------------

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 \$2,151.39, 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:

PF: 1 SC F 2 SC B

LOAN NO                      DATE      LETTER   VER   REQ   DESCRIPTION                      DATE 08/22/01  
3480415                      07/05/01   OP172   023   NS3   Part 2 Pennsylvania NOI

---

Overnight Mail Address

Western Union Quick Collect

---

3 Ada  
Irvine, Ca. 92618

---

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

PF:                      2 SC B

LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE 08/22/01
3480415	07/05/01	OP173	011	NS3	Part 3 Pennsylvania NOI	

Re: Loan No. 348041-5

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

PF: 1 SC F

LOAN NO  
3480415

DATE  
07/05/01

LETTER  
OP173

VER  
011

REQ  
NS3

DESCRIPTION  
Part 3 Pennsylvania NOI

DATE 08/22/01

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.

---

PF: 1 SC F 2 SC B

LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE
3480415	07/05/01	OP173	011	NS3	Part 3 Pennsylvania NOI	08/22/01

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

PF: 1 SC F 2 SC B

LOAN NO	DATE	LETTER	VER	REQ	DESCRIPTION	DATE 08/22/01
3480415	07/05/01	OP173	011	NS3	Part 3 Pennsylvania NOI	

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

PF: 2 SC B

LOAN NO  
3480415

DATE  
07/05/01

LETTER  
OP174

VER  
016

REQ  
NS3

DESCRIPTION  
Part 4 Pennsylvania NOI

DATE 08/22/01

Re: Loan No. 348041-5

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: NONA SPENCER EXT 8001

PF: 1 SC F



DATE	LETTER	VER	REQ	DESCRIPTION	DATE
07/05/01	OP174	016	NS3	Part 4 Pennsylvania NOI	08/22/01

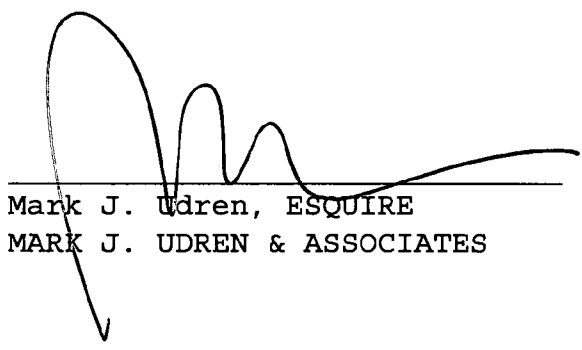
EFFECT OF SHERIFF'S SALE - You should realize that a Sheriff's Sale will  
    
end your ownership of the mortgaged property and your right to occupy it.  
If you continue to live in the property after the Sheriff's Sale, a  
lawsuit to remove you and your furnishings and other belongings could  
be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

YOU MAY ALSO HAVE THE RIGHT TO:

PF: 1 SC F 2 SC B

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 0 2 2001  
William A. Shaw  
Prothonotary

Warden  
Pd 88000  
McClellan

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 11490

WELLS FARGO BANK MINNESOTA,

01-1483-CD

VS.

PELTON, PAULINE E.

**COMPLAINT IN MORTGAGE FORECLOSURE**

**SHERIFF RETURNS**

NOW SEPTEMBER 10, 2001 AT 8:35 AM DST SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON PAULINE E. PELTON, DEFENDANT AT SHERIFF'S DEPT., COURTHOUSE, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO PAULINE E. PELTON A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: DAVIS/MORGILLO

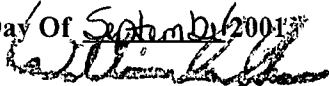
**Return Costs**

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

**FILED**

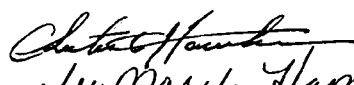

SEP 14 2001  
013:00 L110  
William A. Shaw  
Prothonotary

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   
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

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038

Plaintiff

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 01-1483-CD

**FILED**

**OCT 18 2001**

William A. Shaw  
Prothonotary

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

TO THE PROTHONOTARY:

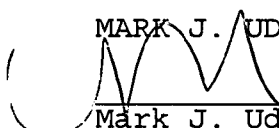
Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$65,483.49
Interest Per Complaint	1,115.40
From 8/23/01 to 10/16/01	
Late charges per Complaint	75.60
From 8/23/01 to 10/16/01	

**TOTAL** **\$66,674.49**

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

FILED

OCT 18 2001

M131D10th Widen rd \$20.00  
William A. Shaw  
F. Chronotary

net. to Dy  
Stat. to 0th Widen

**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**

Wells Fargo Bank Minnesota, N.A., as  
Trustee for registered Holders of Option  
One Mortgage Loan Trust 2000-C, Asset-  
Backed Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION

Clearfield County

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821  
Defendant(s)

NO. 01-1483-CD

DATED: October 3, 2001  
TO: Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821

**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  
E-Mail: [info@pabar.org](mailto:info@pabar.org)  
Internet: [www.pabar.org](http://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.

SERVICIO DE REFERENCIA LEGAL  
LAWYER REFERRAL SERVICE  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
800-932-0311  
717-238-6715  
E-Mail: [info@pabar.org](mailto:info@pabar.org)  
Internet: [www.pabar.org](http://www.pabar.org)

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

ATTORNEY FOR PLAINTIFF

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 01-1483-CD

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821  
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: Pauline E. Pelton  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

Defendant:  
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 ~~20~~ October 12<sup>th</sup>, 2001.

  
Notary ~~PATRICE CARTER~~  
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

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038

Plaintiff

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 01-1483-CD

TO: Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821

#### 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

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038

Plaintiff

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 01-1483-CD

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

TO THE PROTHONOTARY:

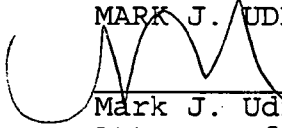
Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$65,483.49
Interest Per Complaint	1,115.40
From 8/23/01 to 10/16/01	
Late charges per Complaint	75.60
From 8/23/01 to 10/16/01	

TOTAL \$66,674.49

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

Wells Fargo Bank Minnesota  
Plaintiff(s)

No.: 2001-01483-CD

Real Debt: \$66,674.49

Atty's Comm:

Vs.

Costs: \$

Int. From:

Pauline E. Pelton  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: October 18, 2001

Expires: October 18, 2006

Certified from the record this 18th day 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

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

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038

Plaintiff

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 01-1483-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE SHERIFF:

Issue Writ of Execution in the above matter:

Amount due

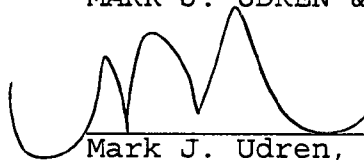
\$66,674.49

Interest From 10/17/01  
to Date of Sale  
Per diem @\$20.28

(Costs to be added)

\$ 120.00

MARK J. UDREN & ASSOCIATES



Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

**FILED**

OCT 18 2001

William A. Shaw  
Notary

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

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

Plaintiff

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821

NO. 01-1483-CD

COPY

Defendant(s)

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:

Old Turnpike Rd., Box 125  
Allport, PA 16821  
SEE LEGAL DESCRIPTION ATTACHED

Amount due

\$66,674.49

Interest From 10/17/01  
to Date of Sale  
Per diem @\$20.28

(Costs to be added)

\$ 120.00

By

Prothonotary

Clerk

Date

10.18.01

COURT OF COMMON PLEAS

NO. 01-1483-CD

=====

Wells Fargo Bank Minnesota, N.A., as Trustee  
for registered Holders of Option One Mortgage Loan  
Trust 2000-C, Asset-Backed Certificates, Series 2000-C  
vs.

Pauline E. Pelton

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 66,674.49

INTEREST \$ \_\_\_\_\_  
from 10/17/01 to \_\_\_\_\_  
Date of Sale \_\_\_\_\_  
Per diem @\$20.28 \_\_\_\_\_

COSTS PAID:

PROTHY \$ \_\_\_\_\_

SHERIFF \$ \_\_\_\_\_


STATUTORY \$ 4

COSTS DUE PROTHY. \$ 120.00

PREMISES TO BE SOLD:

Old Turnpike Rd., Box 125

Allport, PA 16821

  
\_\_\_\_\_  
Mark J. Udren, ESQUIRE  
MARK J. UDREN & ASSOCIATES  
1040 NORTH KINGS HIGHWAY  
SUITE 500  
CHERRY HILL, NJ 08034  
(856) 482-6900

FILED

OCT 18 2001

013281 Atty Liden pd. \$20.00

William A. Shaw

Prothonotary

ALL THAT CERTAIN LOT OR PIECE OF LAND SITUATE IN THE VILLAGE OF ALLPORT, TOWNSHIP OF MORRIS, COUNTY OF CLEARFIELD, AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT THE CENTER OF TOWNSHIP ROAD LEADING TO CENTER HILL; THENCE IN A NORTHERLY DIRECTION ALONG LANDS OWNED BY A.O. MYERS A DISTANCE OF TWO HUNDRED AND EIGHTY (280) FEET TO A CREEK; THENCE IN A WESTERLY DIRECTION ALONG LANDS OF A.O. MYERS A DISTANCE OF ONE HUNDRED AND EIGHTY (180) FEET TO A POST; THENCE IN A SOUTHERLY DIRECTION ALONG THE LINE OF LAND OF DOYLE BEVERIDGE A DISTANCE OF TWO HUNDRED AND EIGHTY (280) FEET TO THE SAID TOWNSHIP ROAD; THENCE IN AN EASTERLY DIRECTION ALONG THE LINE OF THE SAID TOWNSHIP ROAD A DISTANCE OF ONE HUNDRED AND EIGHTY (180) FEET TO THE PLACE OF BEGINNING.

BEING KNOWN AS OLD TURNPIKE RD., BOX 125, ALLPORT, PA 16821.

PROPERTY ID NO. 124.0-Q09-000-30

TITLE TO SAID PREMISES IS VESTED IN PAULINE E. PELTON BY DEED FROM SAMUEL P. YARGER AND LESLIE R. YARGER, HUSBAND AND WIFE, AS TENANTS BY THE ENTIRETIES, DATED 8/30/00, RECORDED, 9/19/00, INSTR. NO. 200013854.



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

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

**FILED**

FEB 04 2002

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821  
Defendant(s)

NO. 01-1483-CD

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 Praeipce 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".

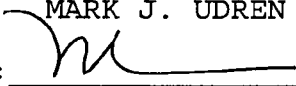
3. If a Return Receipt is not attached hereto, then service was by personal service on the date specified on the attached Return of Service, attached hereto as Exhibit "B".

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: January 30, 2002

BY: MARK J. UDREN & ASSOCIATES  
  
Mark J. Udren, Esquire  
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

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038

Plaintiff

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
  
MORTGAGE FORECLOSURE

NO. 01-1483-CD

AMENDED AFFIDAVIT PURSUANT TO RULE 3129.1

Wells Fargo Bank Minnesota, N.A., as Trustee for registered Holders of Option One Mortgage Loan Trust 2000-C, Asset-Backed Certificates, Series 2000-C, 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: Old Turnpike Rd., Box 125, Allport, PA 16821

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

Pauline E. Pelton Old Turnpike Rd., Box 125, Allport, PA 16821

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

Associates of Phillipsburg 500 Stambaugh Building  
Youngstown, OH 44503

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

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

Real Estate Tax Dept. 230 E. Market St., Clearfield, PA 16830

Domestic Relations Section 230 E. Market St., Clearfield, PA 16830

Commonwealth of PA, Bureau of Compliance, Dept. 280946  
Department of Revenue 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 Old Turnpike Rd., Box 125, Allport, PA 16821

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: January 30, 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

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 01-1483-CD

v.  
Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821  
Defendant(s)

DATE: December 10, 2001

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

NOTICE OF SHERIFF'S SALE  
OF REAL PROPERTY

OWNER(S): PAULINE E. PELTON

PROPERTY: Old Turnpike Rd., Box 125  
Allport, PA 16821

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on FEBRUARY 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*

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	PELTON	TAX CLAIMS BUREAU 230 EAST MARKET STREET CLEARFIELD, PA 16830											
2	0127422	DOMESTIC RELATIONS SECTION 230 EAST MARKET STREET CLEARFIELD, PA 16830											
3	ALICE D	COM OF PA DEPT OF REVENUE BUREAU OF COMPLIANCE DEPT 280946 HARRISBURG, PA 17128-0946											
4		TENANTS/OCCUPANTS OLD TURNPIKE ROAD BOX 125 ALLPORT, PA 16821											
5	CLEARFIEL D	ASSOCIATES OF PHILLIPSBURG 500 STAMBAUGH BUILDING YOUNGSTOWN, OH 44503											
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 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 third and fourth class parcels.								

PS Form 3877, February 1994

Form Must be Completed by Typewriter, Ink or Ball Point Pen

EXHIBIT A

FILED  
M 11:07 ~~AM~~ NO  
FEB 04 2002 ~~ca~~ ~~ca~~

William A. Shaw  
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11670

WELLS FARGO BANK MINNESOTA

01-1483-CD

VS.

PELTON, PAULINE E.

WRIT OF EXECUTION

REAL ESTATE

SHERIFF RETURNS

NOW, FEBRUARY 25, 2002, RECEIVED LETTER FROM MARK UDREN, ATTORNEY FOR PLAINTIFF, THAT SALE IS TO BE STAYED AS DEFENDANT IS CURRENT WITH REPAYMENT PLAN. JODY WILL CONTACT US WITH AMOUNT OF PAYMENT.

NOW, APRIL 15, 2002, RETURN WRIT AS NO SALE HELD AS DEFENDANT IS CURRENT WITH REPAYMENT PLAN. PAID COSTS FROM ADVANCE AND MADE REFUND OF UNUSED ADVANCE TO THE ATTORNEY.

SHERIFF HAWKINS \$200.50

SURCHARGE \$ 20.00

PAID BY ATTORNEY

FILED

APR 16 2002

019.00

William A. Shaw  
Prothonotary

*EPS*

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 *William A. Shaw*  
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

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038

Plaintiff

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 01-1483-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:

Old Turnpike Rd., Box 125  
Allport, PA 16821  
SEE LEGAL DESCRIPTION ATTACHED

Amount due

\$66,674.49

Interest From 10/17/01  
to Date of Sale  
Per diem @\$20.28

(Costs to be added)

\$ 120.00

RECEIVED OCT 19 2001

@ 1:32 PM

Chester A. Hawkins  
by Margaret H. Pratt

By

Prothonotary

Clerk

Date

10-18-01



**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 11670

WELLS FARGO BANK MINNESOTA

01-1483-CD

VS.

PELTON, PAULINE E.

WRIT OF EXECUTION

REAL ESTATE

**SHERIFF RETURNS**

---

NOW, DECMEBER 7, 2001, AT 12:40 AM O'CLOCK A LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDANT.

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

NOW, DECEMBER 10, 2001, AT 10:30 AM O'CLOCK PROPERTY OF THE DEFENDANT WAS POSTED WITH NOTICE OF SALE.

NOW, DECEMBER 10, 2001, AT 10:39 AM O'CLOCK SERVED WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY ON PAULINE PELTON, DEFENDANT, AT TELCOTT AND SIXTH STREETS, HAWK RUN, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO PAULINE PELTON, DEFENDANT, 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, 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.

NOW, JANUARY 11, 2002, RECEIVED LETTER FROM MARK UDREN, ATTORNEY FOR PLAINTIFF, THAT SALE IS TO BE POSTPONED UNTIL FRIDAY, MARCH 1, 2002, AT 10:00 AM.

NOW, FEBRUARY 1, 2002, IT WAS ANNOUNCED AT SALE THAT NEW SALE DATE IS FRIDAY, MARCH 1, 2002, AT 10:00 AM.

NOW, FEBRUARY 21, 2001, REVEIVED FAX FROM MARK UDREN, ATTORNEY FOR PLAINTIFF, THAT SALE IS TO BE STAYED AS DEFENDANT IS CURRENT WITH REPAYMENT PLAN.

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  
215-568-9500  
215-568-1141 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  
200 E. Market Street  
Clearfield, PA 16830  
ATTN: Peggy

Re: Wells Fargo Bank Minnesota, N.A., as Trustee  
for registered Holders of Option One Mortgage Loan  
Trust 2000-C, Asset-Backed Certificates, Series 2000-C  
vs.  
Pauline E. Pelton  
Clearfield County C.C.P. No. 01-1483-CD  
Premises: Old Turnpike Rd., Box 125  
Allport, PA 16821  
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:

To Allow Time For A Repayment Plan.

Thank you for your attention to this matter.

Sincerely yours

Mark J. Udren  
MARK J. UDREN & ASSOCIATES

/atd

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  
215-568-9500  
215-568-1141 FAX

PLEASE RESPOND TO NEW JERSEY OFFICE

February 21, 2002

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

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

Re: Wells Fargo Bank Minnesota, N.A., as Trustee for registered  
Holders of Option One Mortgage Loan Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
vs.

Pauline B. Pelton  
Clearfield County C.C.P. No. 01-1483-CD  
Premises: Old Turnpike Rd., Box 125, Allport, PA 16821  
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:

Defendant is current with their repayment plan.

Thank you for your attention to this matter.

Sincerely yours,

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

A.-

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  
215-568-9500  
215-568-1141 FAX

PLEASE RESPOND TO NEW JERSEY OFFICE

February 21, 2002

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

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

Re: Wells Fargo Bank Minnesota, N.A., as Trustee for registered  
Holders of Option One Mortgage Loan Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
vs.

Pauline E. Pelton  
Clearfield County C.C.P. No. 01-1483-CD  
Premises: Old Turnpike Rd., Box 125, Allport, PA 16821  
SS Date: March 1, 2002 (Postponed from February 1, 2002)

Dear Peggy:


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

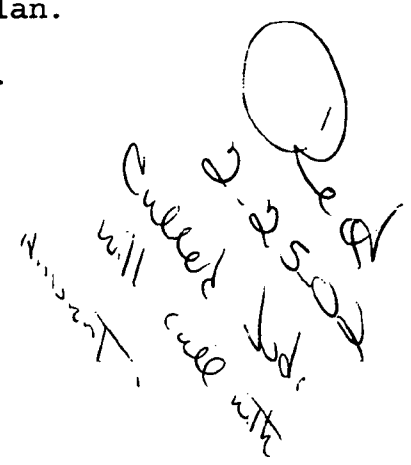
Sale is stayed for the following reason:

Defendant is current with their repayment plan.

Thank you for your attention to this matter.

Sincerely yours,

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

  
Called 2-25-02  
will call with  
amount.

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		10.40
LEVY		15.00
MILEAGE		10.40
POSTING		15.00

CSDS		10.00
COMMISSION 2%		25.22
POSTAGE		4.08
HANDBILLS		15.00
DISTRIBUTION		25.00
ADVERTISING		15.00
ADD'L SERVICE		
DEED		<del>30.00</del>
ADD'L POSTING		
ADD'L MILEAGE		10.40
ADD'L LEVY		
BID AMOUNT		
RETURNS/DEPUTIZE		
COPIES / BILLING	\$15.00 +	2.00
BILLING - PHONE - FAX		
<b>TOTAL SHERIFF COSTS</b>	\$	200.50

**DEED COSTS:**

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

**TOTAL DEED COSTS** \$

**DEBT & INTEREST:**

DEBT-AMOUNT DUE	\$ 66,674.49
INTEREST FROM 10-17-01 TO SALE DATE	
@\$20.28	TO BE ADDED
<b>TOTAL DEBT &amp; INTEREST</b>	\$66,674.49

**COSTS:**

ATTORNEY FEES	\$
PROTH. SATISFACTION	\$
ADVERTISING	\$ 239.70
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	\$ 200.50
SHERIFF COSTS	\$ 83.25
LEGAL JOURNAL AD	\$
REFUND OF ADVANCE	\$
REFUND OF SURCHARGE	\$
PROTHONOTARY	\$ 120.00

**TOTAL COSTS**

\$ 643.45

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

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

Wells Fargo Bank Minnesota,  
N.A., as Trustee  
for registered Holders of  
Option One Mortgage Loan  
Trust 2000-C, Asset-Backed  
Certificates, Series 2000-C  
c/o Option One Mortgage Corp.  
P.O. Box 57038  
Irvine, CA 92619-7038  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 01-1483-CD

v.

Pauline E. Pelton  
Old Turnpike Rd., Box 125  
Allport, PA 16821  
Defendant(s)

PRAECIPE TO MARK SETTLED, DISCONTINUED AND  
ENDED AND SATISFY JUDGMENT

TO THE PROTHONOTARY:

Kindly mark the above captioned matter SETTLED,  
DISCONTINUED AND ENDED AND JUDGMENT SATISFIED, upon payment of  
your costs only.

*Mark Udren*

Mark J. Udren, Esquire  
Mark J. Udren & Associates  
Attorney for Plaintiff

**FILED**

DATED: November 15, 2002

NOV 16 14 44 -  
NOV 26 2002

*Egg*

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Wells Fargo Bank Minnesota

Vs.

No. 2001-01483-CD

Pauline E. Pelton

COPY

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA  
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on 26th day of November, 2002 marked:

Settle and Discontinue

Record costs in the sum of \$\$370.50 have been paid in full by Attorney for Plaintiff.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 26th day of November A.D. 2002.



---

William A. Shaw, Prothonotary