

02-19-CD
CITIFINANCIAL SERVICES, INC. -vs- PEGGY LEE OWENS et al

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
P E N N S Y L V A N I A
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC F/K/A
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

Plaintiff,

vs.

PEGGY LEE OWENS and
BOBBI JO WELCH,

Defendants.

CIVIL DIVISION:

No. 02-10-CD

TYPE OF PLEADING:

Complaint

TYPE OF CASE:

Ejectment

FILED ON BEHALF OF:

CitiFinancial Services, Inc. f/k/a
Commercial Credit Plan Consumer
Discount Company,
Plaintiff

COUNSEL OF RECORD:

RONALD J. DIGIORNO,
ESQUIRE

SUPREME COURT NO.:

39025

FILED

JAN 04 2002

William A. Shaw
Prothonotary

RONALD J. DIGIORNO, ESQ.
Attorney at Law
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

Telephone (724) 378-9951

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA**

CITIFINANCIAL SERVICES, INC. f/k/a	:	
COMMERCIAL CREDIT PLAN	:	
CONSUMER DISCOUNT COMPANY,	:	
	:	
Plaintiff,	:	
vs.	:	No.
	:	
PEGGY LEE OWENS and	:	
BOBBI JO WELCH,	:	
	:	
Defendants.	:	

COMPLAINT IN EJECTMENT

NOTICE

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY THE ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES AND 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 SHOULD NOT HAVE A LAWYER, OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**CLEARFIELD COUNTY COURT ADMINISTRATORS OFFICE
ONE NORTH 2ND STREET
CLEARFIELD, PA 16850**

**TELEPHONE: (814) 765-2641
EXT. 32 OR 88**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CITIFINANCIAL SERVICES, INC. f/k/a	:
COMMERCIAL CREDIT PLAN	:
CONSUMER DISCOUNT COMPANY,	:
	:
Plaintiff,	:
vs.	:
	:
PEGGY LEE OWENS and	:
BOBBI JO WELCH,	:
	:
Defendants.	:

COMPLAINT IN EJECTMENT

AND NOW COMES, Plaintiff, **CITIFINANCIAL SERVICES, INC. f/k/a COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY**, by and through its attorney, **RONALD J. DIGIORNO, ESQUIRE**, with this Complaint in Ejectment and in support thereof avers the following:

1. The Plaintiff, **CITIFINANCIAL SERVICES, INC. f/k/a COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY**, is duly authorized lending institution with principal place of business situate at 7467 New Ridge Road, Suite 222, Hanover, MD 21076.

2. The Defendant, **PEGGY LEE OWENS and BOBBI JO WELCH**, are adult individuals residing at 115 Kate Street, Osceola Mills, Clearfield, Pennsylvania 16666.

3. The premises which is the subject matter of this cause of action is described as follows:

ALL that certain lot or piece of ground situate in the Borough of Osceola., County of Clearfield, and State of Pennsylvania, bounded and described as follows:

Beginning at a point on the South side of Kate Street seventy four (74) feet from corner of

Kate Street and Morgan Street; thence along lot number 447 South 28 3/4° West one hundred fifty (150) feet to Montgomery Alley: thence along said Montgomery Alley North 61 1/4° West thirty eight (38) feet: thence along lot number 445 North 28 3/4° East one hundred fifty (150) feet to Kate Street; thence along the South side of Kate Street 61 1/4° East thirty eight (38) feet to the place of beginning. Containing about 57 75 of one lot as laid out in the general plan of said Borough and to be known as lot number 449 1/2.

HET a dwelling known as 115 Kate Street, Osceola Mills, PA 16666.

Tax Parcel NO. 16-013-378-12

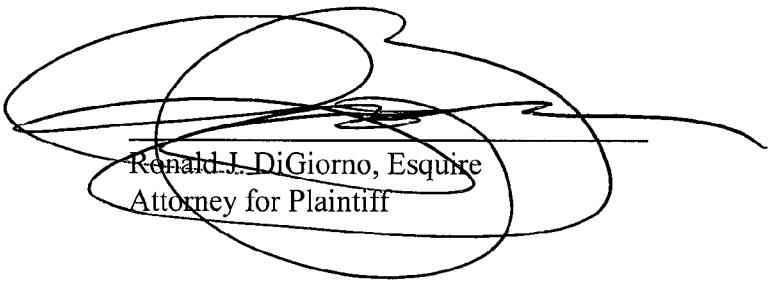
4. Plaintiff is the owner of the above referenced described premises by virtue of a mortgage foreclosure action filed by Plaintiff against **PEGGY LEE OWENS and BOBBI JO WELCH**, in the Court of Common Pleas of Clearfield County at No. 01-330CD. This action was filed on March 7, 2001, served on the Defendants in a manner proscribed by law and, after proper notice, Plaintiff purchased the above described property at the Clearfield County Sheriff's Sale on November 16, 2001.

5. The Defendants are currently in possession of the above described property without right of title and Plaintiff is now the rightful owner of the said premises.

6. Defendants' possession and occupancy of the above described premises is without permission of the rightful owner, namely the Plaintiff.

WHEREFORE, Plaintiff prays this Honorable Court grant it judgment against the Defendant so as to place possession of the above described real property unto the Plaintiff, together with the costs of this action, and such further relief as may be just.

Respectfully submitted,



Ronald J. DiGiorno, Esquire
Attorney for Plaintiff

AFFIDAVIT

STATE OF Maryland : : SS:
COUNTY OF Anne Arundel : :

Before me, the undersigned authority, a Notary Public in and for the State and County aforesaid, personally appeared, Angela Harris of CitiFinancial Services, Inc. f/k/a Commercial Credit Plan Consumer Discount Company, who being by me first duly sworn according to law, deposes and says that the averments contained in the foregoing Complaint are true and correct to the best of his knowledge, information and belief.

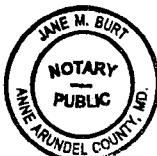
Angela Harris

CitiFinancial Services, Inc. f/k/a
Commercial Credit Plan Consumer
Discount Company

Sworn to and subscribed before me,

this 21 day of December, 2001.

Jane M. Burt
NOTARY PUBLIC - My Commission Expires:



Jane M. Burt Notary Public
Anne Arundel County
State of Maryland
My Commission Expires August 26, 2008

FILED

Atty pd. 80.00
2 cc Sheriff
1cc Atty
M 12-04-02
JAN 04 2002
RJD
RJD

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
P E N N S Y L V A N I A
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC. f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

Plaintiff,
vs.

PEGGY LEE OWENS and
BOBBI JO WELCH,
Defendants.

CIVIL DIVISION:
No. 02-19-CD

TYPE OF PLEADING:

Praecipe for Entry of
Default Judgment

TYPE OF CASE:

Action in Ejectment

FILED OF BEHALF OF:

CitiFinancial Services, Inc. f/ka/
Commercial Credit Plan Consumer
Discount Company, Plaintiff

COUNSEL OF RECORD:

RONALD J. DIGIORNO,
ESQUIRE

SUPREME COURT NO. :

39025

RONALD J. DIGIORNO, ESQ.
Attorney at Law
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

Telephone: (724) 378-9951

FILED

FEB 22 2002

William A. Shaw
Prothonotary

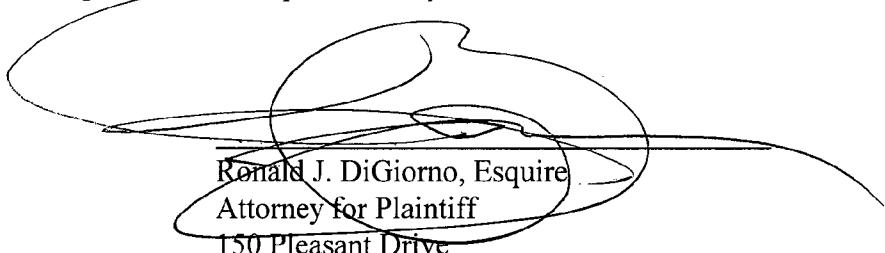
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC. :
f/k/a COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : No. 02-19-CD
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :

PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT

TO: PROTHONOTARY, CLEARFIELD COUNTY

Kindly enter a default judgment against **PEGGY LEE OWENS and BOBBI JO WELCH**, and in favor of **CITIFINANCIAL SERVICES, INC. f/k/a COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY** for Defendants' failure to file and Answer to Plaintiff's Complaint in Ejectment. I certify that Notice of Intent to Take Judgment was mailed to Defendant by First Class Mail on February 5, 2002 pursuant to Rule 273.1, Pa.R.C.P. Enter judgment for Plaintiff together with costs plus attorneys fees.


Ronald J. DiGiorno, Esquire
Attorney for Plaintiff
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

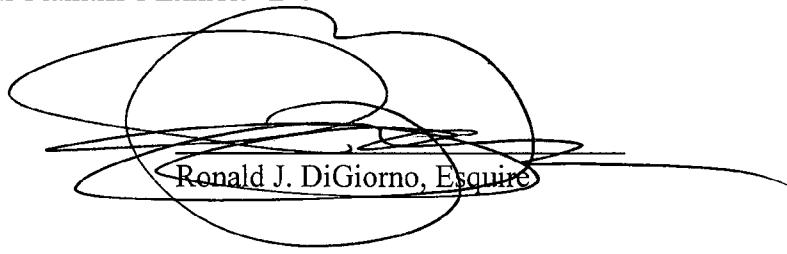
Telephone: (724) 378-9951

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

CITIFINANCIAL SERVICES, INC. :
f/k/a COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : No. 02-19-CD
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :

**CERTIFICATION OF NOTICE OF PRAECIPE FOR ENTRY
OF DEFAULT JUDGMENT PURSUANT TO RULE 237.1 OF
PENNSYLVANIA RULES OF CIVIL PROCEDURE**

The undersigned hereby certifies that Defendants, **PEGGY LEE OWENS and BOBBI JO WELCH**, was given notice of Plaintiff's intention to file the Praecipe for Entry of Default Judgment on February 5, 2002. A copy of said Notice is attached hereto, made a part hereof, incorporated herein by reference and labeled as Plaintiff's Exhibit "A". A copy of the Certificate of Mailing of the above mentioned Notice is also attached hereto, made a part hereof, incorporated herein by reference and labeled as Plaintiff's Exhibit "B".


Ronald J. DiGiorno, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC F/K/A	:	
COMMERCIAL CREDIT PLAN	:	
CONSUMER DISCOUNT COMPANY,	:	
	:	
Plaintiff,	:	
	:	No. 02-19-CD
vs.	:	
	:	
PEGGY LEE OWENS and	:	
BOBBI JO WELCH,	:	
	:	
Defendants.	:	

DATE: February 5, 2002

TO: Bobbi Jo Welch
115 Kate Street
Osceola Mills, PA 16666

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS FOR THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

CLEARFIELD COUNTY COURT ADMINISTRATORS OFFICE
ONE NORTH 2ND STREET
CLEARFIELD, PA 16850

TELEPHONE: (814) 765-2641
EXT. 32 or 88

Ronald J. DiGiorno, Esquire
Attorney for Plaintiff

Exhibit A

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC F/K/A :
COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. :
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :
No. 02-19-CD

DATE: February 5, 2002

TO: Peggy Lee Owens
115 Kate Street
Osceola Mills, PA 16666

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN (10) DAYS FOR THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

**CLEARFIELD COUNTY COURT ADMINISTRATORS OFFICE
ONE NORTH 2ND STREET
CLEARFIELD, PA 16850**

**TELEPHONE: (814) 765-2641
EXT. 32 or 88**

Ronald J. DiGiorno, Esquire
Attorney for Plaintiff

Exhibit A

U.S. POSTAL SERVICE	CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	
Received From: <u>Ronald J. Dibiorio</u> <u>150 Pleasant Drive</u> <u>Aliquippa, PA 15001</u>	
One piece of ordinary mail addressed to: <u>Bobbi Jo Welch</u> <u>115 Kate Street</u> <u>Oscela Mills, PA 17070</u>	

Affix fee here in stamps
or meter postage and
post mark. Inquire of
Postmaster for current
fee.

PS Form 3817, January 2001

Exhibit B

U.S. POSTAL SERVICE	CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL. DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	
Received From: <u>Conrad J. DiBiorn D</u> <u>150 Pleasant Drive</u> <u>Aliquippa, PA 15001</u>	
One piece of ordinary mail addressed to: <u>Peggy Lee Owens</u> <u>115 Kate Street</u> <u>Osceola Mills, PA 15074</u>	

Affix fee here in stamps
or meter postage and
post mark. Inquire of
Postmaster for current
fee.

PS Form 3817, January 2001

Exhibit B

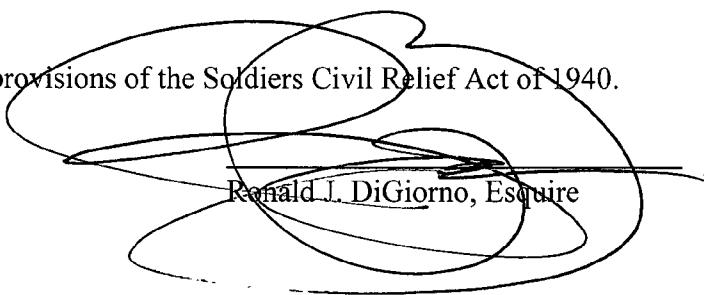
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC. :
f/k/a COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : **No. 02-19-CD**
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :

COMMONWEALTH OF PENNSYLVANIA : **SS:**
COUNTY OF BEAVER :
:

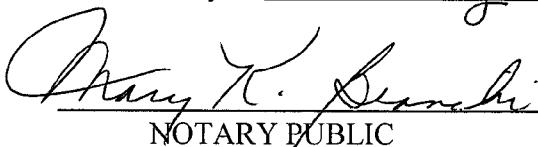
BEFORE me, the undersigned authority, personally appeared Ronald J. DiGiorno, Esquire, who, being duly sworn according to law, deposes and says that he is advised and believes that **Defendants, Peggy Lee Owens and Bobbi Jo Welch**, are not presently in the active military service of the United States of America and not a member of the Army of the United States, United States Navy, the Marine Corps, or the Coast Guard, and not an officer of the Public Health Service detailed by proper authority for duty with the Army or Navy; nor engaged in any active military service or duty with any military or naval units covered by the Soldiers and Sailors Civil Relief Act of 1940 and designated therein as military service, and to the best of this affiant's knowledge in not enlisted in military service covered by said Act, and that the averments herein set forth, insofar as they are within his knowledge, are correct, and true; and insofar as they are based on information received from others, are true and correct as he verily believes.

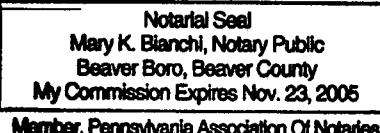
This Affidavit is made under the provisions of the Soldiers Civil Relief Act of 1940.


Ronald J. DiGiorno, Esquire

Sworn to and subscribed before me

this 14th day of February, 2002.


Mary K. Bianchi
NOTARY PUBLIC



Member, Pennsylvania Association Of Notaries

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

CITIFINANCIAL SERVICES, INC. :
f/k/a COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : No. 02-19-CD
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :
:

AFFIDAVIT OF LAST KNOWN ADDRESS

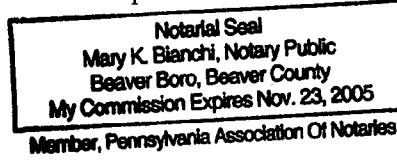
COMMONWEALTH OF PENNSYLVANIA :
: SS
COUNTY OF BEAVER :
:

Before me, the undersigned authority, in and for said County and state personally appeared **RONALD J. DIGIORNO, ESQUIRE**, who being duly sworn according to law, deposes and says that the principal office of Plaintiff, **CITIFINANCIAL SERVICES, INC.** f/k/a **COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY**, is situate at 7467 New Ridge Road, Hanover, MD 21076 and that the last known address of Defendants, **PEGGY LEE OWENS and BOBBI JO WELCH** is 115 Kate Street, Osceola Mills, Clearfield County, Pennsylvania 16666.

Sworn to and subscribed before me,
this 14th day of February, 2002.

Mary K. Bianchi

NOTARY PUBLIC - My Commission Expires:



FILED

FEB 22 2002

M 3.24 Lett. D. Amno
William A. Shaw
Prothonotary

pd. \$30.00

not to Reg.

for
~~State of~~

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

**CITIFINANCIAL SERVICES, INC. f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,**

CIVIL DIVISION:

No. 02-19-CD

Plaintiff,

vs.

**PEGGY LEE OWENS and
BOBBI JO WELCH,**

Defendants.

TYPE OF PLEADING:

Praeclipe for Writ of
Possession

TYPE OF CASE:

Action in Ejectment

FILED OF BEHALF OF:

CitiFinancial Services, Inc. f/ka/
Commercial Credit Plan Consumer
Discount Company, Plaintiff

COUNSEL OF RECORD:

**RONALD J. DIGIORNO,
ESQUIRE**

SUPREME COURT NO. :

39025

**RONALD J. DIGIORNO, ESQ.
Attorney at Law
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001**

Telephone: (724) 378-9951

FILED

FEB 22 2002

**William A. Shaw
Prothonotary**

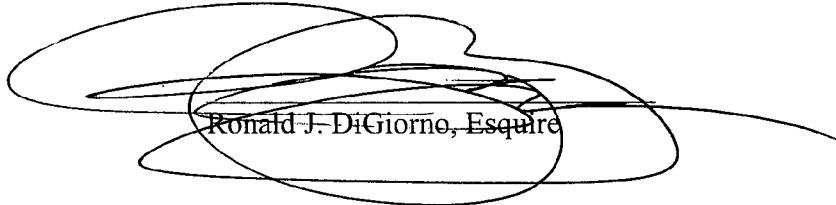
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL DIVISION - LAW

CITIFINANCIAL SERVICES, INC.	:
f/k/a COMMERCIAL CREDIT PLAN	:
CONSUMER DISCOUNT COMPANY,	:
Plaintiff,	:
vs.	:
	No. 02-19-CD
PEGGY LEE OWENS and	:
BOBBI JO WELCH,	:
Defendants.	:

PRAECIPE FOR WRIT OF POSSESSION

TO: PROTHONOTARY OF CLEARFIELD COUNTY

Issue Writ of Possession in favor of the Plaintiff, **CITIFINANCIAL SERVICES, INC.**
f/k/a COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY, and against
the Defendants, **PEGGY LEE OWENS and BOBBI JO WELCH**, in the above matter.



Ronald J. DiGiorno, Esquire

FILED

FEB 22 2002

013-32107-Dutton
William A. Shaw
Prothonotary

pd \$20.00

*John J. Dutton
Shaw*

COPY

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

**CITIFINANCIAL SERVICES, INC. f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,**

Plaintiff,

vs.

**PEGGY LEE OWENS and
BOBBI JO WELCH,**

Defendants.

CIVIL DIVISION:

No. 02-19-CD

TYPE OF PLEADING:

Writ of Possession

TYPE OF CASE:

Action in Ejectment

FILED OF BEHALF OF:

CitiFinancial Services, Inc. f/ka/
Commercial Credit Plan Consumer
Discount Company, Plaintiff

COUNSEL OF RECORD:

**RONALD J. DIGIORNO,
ESQUIRE**

SUPREME COURT NO. :

39025

**RONALD J. DIGIORNO, ESQ.
Attorney at Law
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001**

Telephone: (724) 378-9951

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

CITIFINANCIAL SERVICES, INC. :
f/k/a COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : No. 02-19-CD
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :

WRIT OF POSSESSION

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF CLEARFIELD : SS.
TO: SHERIFF OF CLEARFIELD COUNTY:
1. To satisfy the judgment for possession in the above matter you are directed to
deliver possession of the following described property to **CITIFINANCIAL SERVICES, INC.**
f/k/a COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY.
2. The property to be delivered to Plaintiff is located at:

115 Kate Street
Osceola Mills, PA 16666

A full description of the premises is attached hereto.

Prothonotary of the Court of
Common Pleas of Clearfield County

By Willie L. Blair
Deputy

(SEAL OF COURT)

DATE: 2/22/02

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

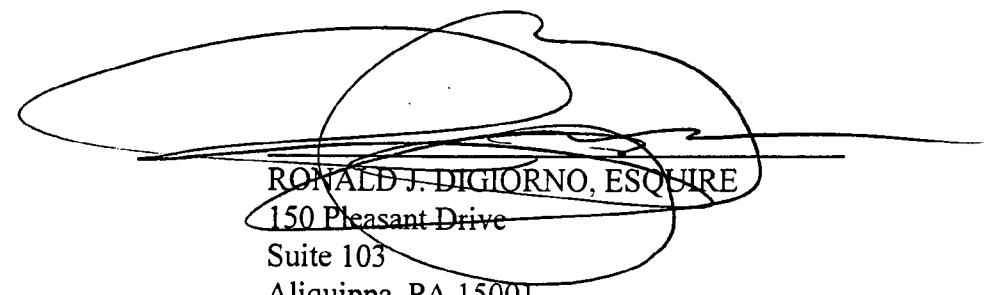
CITIFINANCIAL SERVICES, INC.	:
f/k/a COMMERCIAL CREDIT PLAN	:
CONSUMER DISCOUNT COMPANY,	:
	:
Plaintiff,	:
	:
vs.	:
	No. 02-19-CD
	:
PEGGY LEE OWENS and	:
BOBBI JO WELCH,	:
	:
Defendants.	:

ALL that certain lot or piece of ground situate in the Borough of Osceola, County of Clearfield, and State of Pennsylvania, bounded and described as follows:

BEGINNING at a point on the South side of Kate Street seventy four (74) feet from center of Kate Street and Morgan Street; thence along lot number 447 South 28 3/4° West one hundred fifty (150) feet to Montgomery Alley; thence along said Montgomery Alley North 61 1/4° West thirty eight (38) feet; thence along lot number 445 North 28 3/4° East one hundred fifty (150) feet to Kate Street; thence along the South side of Kate Street 61 1/4° East thirty eight (38) feet to the place of beginning. Containing about 57/75 of one lot as laid out in the general plan of said Borough and to be known as lot number 449 1/2.

HET a dwelling as 115 Kate Street, Osceola Mills, PA 16666.

Parcel 16-013-378-12



RONALD J. DIGIORNO, ESQUIRE
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

Telephone: (724) 378-9951

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11941

CITIFINANCIAL SERVICES, INC.

02-19-CD

VS.

OWENS, PEGGY LEE & BOBBI JO WELCH

COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW JANUARY 9, 2002 AT 9:45 AM EST SERVED THE WITHIN COMPLAINT
IN EJECTMENT ON PEGGY LEE OWENS, DEFENDANT AT RESIDENCE,
1061/2 KATE ST., OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA BY
HANDNIG TO PEGGY LEE OWENS A TRUE AND ATTESTED COPY OF THE
ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS
THEREOF.

SERVED BY: NEVLING

NOW JANUARY 9, 2002 AT 9:45 AM EST SERVED THE WITHIN COMPLAINT
IN EJECTMENT ON BOBBI JO WELCH, DEFENDANT AT RESIDENCE, 106 1/2 KATE
ST., OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO
PEGGY LEE OWENS, ADULT AT RESIDENCE A TRUE AND ATTESTED COPY OF
THE ORIGNIAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE
CONTENTS THEREOF.

SERVED BY: NEVLING.

Return Costs

Cost	Description
37.34	SHFF. HAWKINS PAID BY: ATTY.
20.00	SURCHARGE PAID BY; ATTY.

FILED

MAR 25 2002

01930 1am
William A. Shaw
Prothonotary

Feb

So Answers,

Chester Hawkins
by Marilyn Harr
Chester A. Hawkins
Sheriff

Sworn to Before Me This

25th Day Of March 2002
Jacqueline Kendrick
Deputy Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12178

CITIFINANCIAL SERVICES, INC. ET AL

02-19-CD

VS.

OWENS, PEGGY LEE

WRIT OF POSSESSION

SHERIFF RETURNS

FILED

APR 16 2002

019:00

William A. Shaw
Prothonotary

Sworn to Before Me This

16th Day Of April 2002

WILLIAM A. SHAW
Prothonotary

My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,

Chester A. Hawkins
by Maryann N. Pitt
Chester A. Hawkins
Sheriff

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12178

CITIFINANCIAL SERVICES, INC. ET AL

02-19-CD

VS.
OWENS, PEGGY LEE

WRIT OF POSSESSION

SHERIFF RETURNS

NOW, MARCH 5, 2002, AT 10:16 AM O'CLOCK POSTED PROPERTY AT 115 KATE STREET, OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA, WITH WIRT OF POSSESSION.

NOW, MARCH 5, 2002, AT 10:20 AM O'CLOCK SERVED WRIT OF POSSESSION ON PEGGY LEE OWNES, DEFENDANT, AT HER PLACE OF RESIDENCE, 106 1/2, KATE STREET, OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO PEGGY LEE OWENS, DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF POSSESSION AND MADE KNOWN TO HER THE CONTENTS THEREOF.

NOW, MARCH 5, 2002, AT 10:20 AM O'CLOCK SERVED WRIT OF POSSESSION ON PEGGY LEE OWENS, ADULT AT RESIDENCE FOR BOBBY JO WELCH, DEFENDANT, AT HER PLACE OF RESIDENCE 106 1/2 KATE STREET, OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO PEGGY LEE OWENS, ADULT AT RESIDENCE FOR BOBBY JO WELCH, DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF POSSESSION AND MADE KNOWN TO HER THE CONTENTS THEREOF.

NOW, APRIL 15, 2002, RETURN WRIT AS BEING SERVED, PAID COSTS FROM ADVANCE AND MADE REFUND OF UNUSED ADVANCE TO THE ATTORNEY.

**SHERIFF HAWKINS \$72.00
SURCHARGE \$20.00
PAID BY ATTORNEY**

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

CITIFINANCIAL SERVICES, INC. f/k/a
COMMERCIAL CREDIT PLAN
CONSUMER DISCOUNT COMPANY,

CIVIL DIVISION:

No. 02-19-CD

Plaintiff,

vs.

PEGGY LEE OWENS and
BOBBI JO WELCH,

Defendants.

TYPE OF PLEADING:

Praeclipe for Writ of
Possession

TYPE OF CASE:

Action in Ejectment

FILED OF BEHALF OF:

CitiFinancial Services, Inc. f/ka/
Commercial Credit Plan Consumer
Discount Company, Plaintiff

COUNSEL OF RECORD:

RONALD J. DIGIORNO,
ESQUIRE

SUPREME COURT NO. :

39025

RONALD J. DIGIORNO, ESQ.
Attorney at Law
150 Pleasant Drive
Suite 103
Aliquippa, PA 15001

Telephone: (724) 378-9951

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

FEB 22 2002

Attest.

William J. R.
Prothonotary/
Clerk of Courts

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

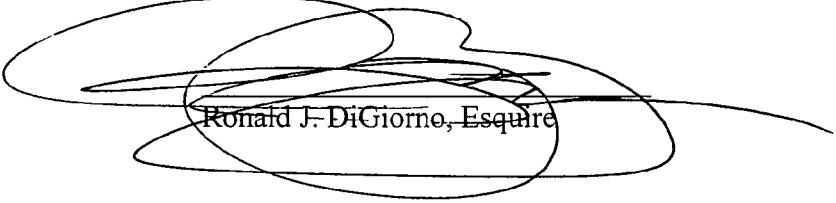
CITIFINANCIAL SERVICES, INC. :
f/k/a COMMERCIAL CREDIT PLAN :
CONSUMER DISCOUNT COMPANY, :
Plaintiff, :
vs. : No. 02-19-CD
PEGGY LEE OWENS and :
BOBBI JO WELCH, :
Defendants. :

PRAECIPE FOR WRIT OF POSSESSION

TO: PROTHONOTARY OF CLEARFIELD COUNTY

Issue Writ of Possession in favor of the Plaintiff, **CITIFINANCIAL SERVICES, INC.**

f/k/a COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY, and against
the Defendants, **PEGGY LEE OWENS and BOBBI JO WELCH**, in the above matter.


Ronald J. DiGiorno, Esquire