

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. 02-19-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,  
P E N N S Y L V A N I A**

<b>CITIFINANCIAL SERVICES, INC. f/k/a</b>	:	
<b>COMMERCIAL CREDIT PLAN</b>	:	
<b>CONSUMER DISCOUNT COMPANY,</b>	:	
	:	
Plaintiff,	:	
vs.	:	No.
	:	
<b>PEGGY LEE OWENS and</b>	:	
<b>BOBBI JO WELCH,</b>	:	
	:	
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 2<sup>ND</sup> STREET  
CLEARFIELD, PA 16850**

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

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
P E N N S Y L V A N I A**

<b>CITIFINANCIAL SERVICES, INC. f/k/a</b>	:	
<b>COMMERCIAL CREDIT PLAN</b>	:	
<b>CONSUMER DISCOUNT COMPANY,</b>	:	
	:	
Plaintiff,	:	
vs.	:	<b>No.</b>
	:	
<b>PEGGY LEE OWENS and</b>	:	
<b>BOBBI JO WELCH,</b>	:	
	:	
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  $28 \frac{3}{4}^{\circ}$  West one hundred fifty (150) feet to Montgomery Alley; thence along said Montgomery Alley North  $61 \frac{1}{4}^{\circ}$  West thirty eight (38) feet; thence along lot number 445 North  $28 \frac{3}{4}^{\circ}$  East one hundred fifty (150) feet to Kate Street; thence along the South side of Kate Street  $61 \frac{1}{4}^{\circ}$  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  $\frac{1}{2}$ .

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

Tax Parcel NO. 16-013-378-12

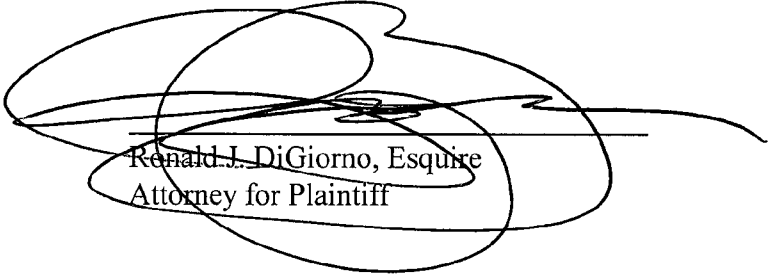
4. Plaintiff is the owner of the above referenced described premises by virtue of a mortgage foreclosure action filed by Plaintiff against **PEGGY LEE OWENS and BOBBI JO WELCH**, in the Court of Common Pleas of Clearfield County at No. 01-330CD. This action was filed on March 7, 2001, served on the Defendants 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 :  
COUNTY OF ANNE ARUNDEL : SS:

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.

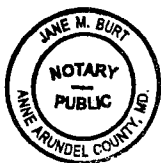
Angela Harris

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  
Seal Commission Expires  
My Commission Expires August 26, 2008

FILED

*JSB*

JAN 04 2002

*M/2:04 PM*

*Atty pd 82.00  
and Sheriff*

*ICC Atty*

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



Telephone: (724) 378-9951

~~Ronald J. DiGiorno, Esquire~~

**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.

**No. 02-19-CD**

**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 2<sup>ND</sup> STREET  
CLEARFIELD, PA 16850**

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

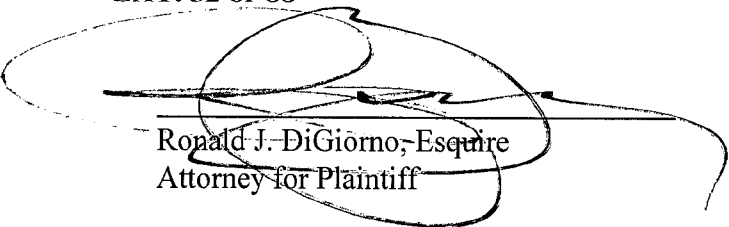
  
Ronald J. DiGiorno, Esquire  
Attorney for Plaintiff

Exhibit A

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
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.

**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 D 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 2<sup>ND</sup> 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:	
Ronald J. Dibiorno	
150 Pleasant Drive	
Aliquippa PA 15001	
One piece of ordinary mail addressed to:	
Bobbi Jo Welch	
115 Kate Street	
Osceola Mills, PA 15060	

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: Ronald J. DiGiorno 150 Pleasant Drive Alliquippa, PA 15001	
One piece of ordinary mail addressed to: Peggy Lee Owens 115 Kate Street Osceola Mills, PA 16064	

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,  
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.

No. 02-19-CD

PEGGY LEE OWENS and  
BOBBI JO WELCH,

Defendants.

COMMONWEALTH OF PENNSYLVANIA

SS:

COUNTY OF BEAVER

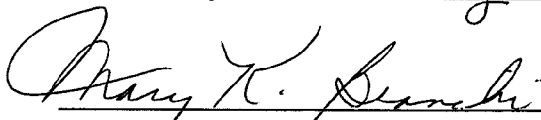
BEFORE me, the undersigned authority, personally appeared Ronald J. DiGiorno, Esquire, who, being duly sworn according to law, deposes and says that he is advised and believes that **Defendants, Peggy Lee Owens and Bobbi Jo Welch**, are not presently in the active military service of the United States 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 14<sup>th</sup> day of February, 2002.

  
NOTARY PUBLIC

Notarial Seal  
Mary K. Bianchi, Notary Public  
Beaver Boro, Beaver County  
My Commission Expires Nov. 23, 2005  
Member, Pennsylvania Association Of Notaries

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.

No. 02-19-CD

PEGGY LEE OWENS and  
BOBBI JO WELCH,

Defendants.

AFFIDAVIT OF LAST KNOWN ADDRESS

COMMONWEALTH OF PENNSYLVANIA

SS

COUNTY OF BEAVER

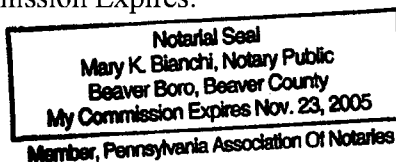
Before me, the undersigned authority, in and for said County and state personally appeared **RONALD J. DIGIORNO, ESQUIRE**, who being duly sworn according to law, deposes and says that the principal office of Plaintiff, **CITIFINANCIAL SERVICES, INC. f/k/a COMMERCIAL CREDIT PLAN CONSUMER DISCOUNT COMPANY**, 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 14<sup>th</sup> day of February, 2002.

  
NOTARY PUBLIC - My Commission Expires:

  
Ronald J. DiGiorno, Esquire





FILED

FEB 22 2002

m/3.24 keth R. D. D. m  
William A. Shaw  
Prothonotary

Q1  
not to Day  
~~Q1~~

FILED  
FEB 22 2002  
CLERK OF COURT  
JANUARY 2002

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 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

~~Ronald J. DiGiorno, Esquire~~

FILED

FEB 22 2002

03.334 atty Ductone  
William A. Shaw  
Prothonotary  
pd \$ 20.00

~~Ed~~ 2 warts Shewd

**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,  
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.

No. 02-19-CD

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.

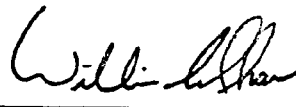
2. The property to be delivered to Plaintiff is located at:

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



Deputy

(SEAL OF COURT)

DATE: 2.22.02

**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.

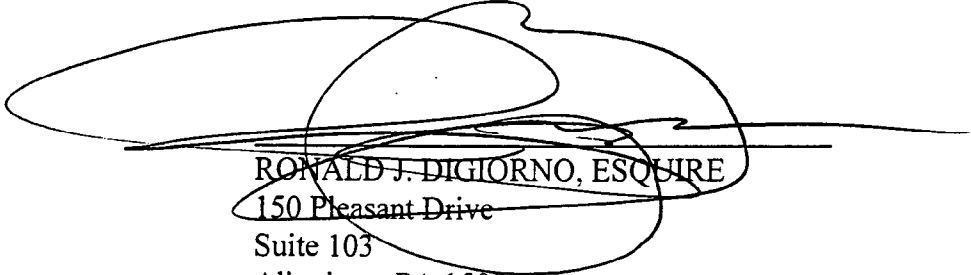
No. 02-19-CD

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  $28\frac{3}{4}^{\circ}$  West one hundred fifty (150) feet to Montgomery Alley; thence along said Montgomery Alley North  $61\frac{1}{4}^{\circ}$  West thirty eight (38) feet; thence along lot number 445 North  $28\frac{3}{4}^{\circ}$  East one hundred fifty (150) feet to Kate Street; thence along the South side of Kate Street  $61\frac{1}{4}^{\circ}$  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  $\frac{1}{2}$ .

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

019:30 lam  
William A. Shaw  
Prothonotary

Feb

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

So Answers,

Chester A. Hawkins  
by Mandy Hamr

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

**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 *Margaret H. Putt*  
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,

Plaintiff,

vs.

PEGGY LEE OWENS and  
BOBBI JO WELCH,

Defendants.

CIVIL DIVISION:

No. 02-19-CD

TYPE OF PLEADING:

Praecipe for Writ of  
Possession

TYPE OF CASE:

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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 A. Shaw*  
Prothonotary/  
Clerk of Courts

~~Ronald J. DiGiorno, Esquire~~