

02-267-CD
FEDERAL NATIONAL MORTGAGE "vs" ROBERT L. ROWLES et al
ASSOCIATION

THE LAW OFFICES OF BARBARA A. FEIN, P.C.
Barbara A. Fein, Esquire / I.D. No. 53002
Kristen J. DiPaolo, Esquire / I.D. No. 79992
Suite 100, 425 Commerce Drive
Fort Washington, PA 19034
(215) 653-7450
Attorney for Plaintiff

FEDERAL NATIONAL
MORTGAGE ASSOCIATION,
Plaintiff,

v.

ROBERT L. ROWLES,
KIMBERLY S. ROWLES and
OCCUPANTS OF
RR 1 Box 371,
Grampian, PA 16838,
Defendants.

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

NO. 02-267-CO

FILED

FEB 25 2002

01/11/06 aty Fm pd 80.00
By William A. Shaw 3rd Sheriff
Prothonotary

CIVIL ACTION 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 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.

Raymond L. Billotte, Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16380
(814) 765-2641

NOTICIA

LE HAN DEMANDADO A USTED EN LA CORTE. SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINAS SIGUIENTES, USTED TIENE (20) DIAS DE PLAZO A PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICACION. USTED DEBE PRESENTAR UNA APARIENCIA ESCRITA O EN PERSONA O POR ABOGADO Y ARCHIVAR EN LA CORTE SUS DEFENSAS O SUS OBJECCIONES A LAS DEMANDAS ENCONTRA DE SU PERSONA. SEA AVISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE ENTRAR UNA ORDEN CONTRA USTED SIN PREVIO AVISO O NOTIFICACION O POR CUALQUIER QUEJA O ALIVIO QUE ESPEDIDO EN LA PETICION DE DEMANDA. USTED PUEDE PERDER DINERO, SUS PROPIEDADES O OTROS DERECHOS IMPORTANTES PARA USTED.

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

Raymond L. Billotte, Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16380
(814) 765-2641

CIVIL ACTION -- EJECTMENT

1. The Plaintiff, Federal National Mortgage Association, is a corporation organized and existing under the laws of The United States of America and the Commonwealth of Pennsylvania, and having its principal place of business at 1900 Market Street, Suite 800, Philadelphia, PA 19103.

2. (a) The Defendant, Robert L. Rowles is an individual whom Plaintiff believes and therefore avers is residing at the property address, that being RR 1 Box 371, within the Township of Penn, Clearfield County, Pennsylvania, hereinafter referred to as the "Premises".

(b) The Defendant, Kimberly S. Rowles is an individual whom Plaintiff believes and therefore avers is residing at the property address, that being RR 1 Box 371, within the Township of Penn, Clearfield County, Pennsylvania, hereinafter referred to as the "Premises".

(c) The Defendant Unknown Occupants are individuals whom Plaintiff believes and therefore avers are residing at the Premises.

3. The Premises which are described at Exhibit "A" attached hereto and incorporated herein by reference, were sold at the Clearfield County Sheriff's Sale conducted on January 4, 2002, after due advertisement and according to law, under and by virtue of a Writ of Execution issued to satisfy a Judgment entered in the

Court of Common Pleas for Clearfield County at the suit of GMAC Mortgage Corporation d/b/a Ditech.Com v. Robert L. Rowles and Kimberly S. Rowles, as Court Docket Number 01-1251-CD.

4. The Premises were purchased by the Plaintiff at the Sheriff's Sale, said sale results being a matter of public record.

5. The Plaintiff acquired title to the Premises on the date of and by virtue of said Sheriff's Sale, and is the real and current entitled owner of said Premises by virtue of a Clearfield County Sheriff's Deed Poll, to be recorded in the Clearfield County Recorder of Deeds' Office at the earliest possible date.

6. The persons in possession of the Premises are believed to be the Defendants in this action and are occupying the Premises without right and without claim to title.

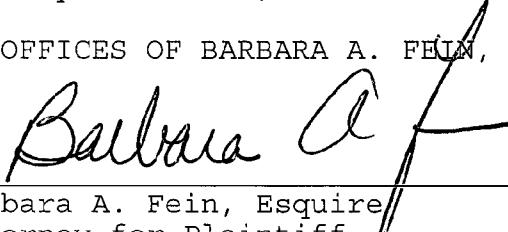
7. The Defendants herein named were duly served with Notices of the Sheriff's Sale held on January 4, 2002.

8. Plaintiff has demanded possession of the Premises from the Defendants who have refused to deliver up the possession thereof.

WHEREFORE, the Plaintiff, Federal National Mortgage Association, respectfully requests entry of judgment for immediate possession of the Premises, issuance of a Writ of Possession and a judgment of its costs and disbursements in this action.

Respectfully Submitted,

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY: 

Barbara A. Fein, Esquire
Attorney for Plaintiff
Attorney I.D. No. 53002

DESCRIPTION

ALL THAT CERTAIN lot or parcel of land situate in the Township of Penn, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at the Southeastern corner of the parcel hereby conveyed at the right of way of Legislative Route No. 17028, being the road leading from Grampian to Chestnut Grove in the line of land now or formerly of Earl Nelen; thence in Northwesterly direction along Route No. 17028 four hundred seventeen and forty-two one-hundredths (417.42) feet, more or less, to an iron pin; thence in a Northerly direction through land now or formerly of Eleanor Byers, three hundred thirteen and seven one-hundredths (313.07) feet, more or less, to an iron pin; thence still through the land now or formerly of Eleanor Byers in a Southeasterly direction four hundred seventeen and forty-two one-hundredths (417.42) feet, more or less, to the line of land now or formerly of Earl Nelen; thence by line now or formerly of Nelen in a Southerly direction three hundred thirteen and seven one-hundredths (313.07) feet, more or less, to the line of Highway Route No. 17028 and the place of beginning. Containing three (3) acres, more or less.

Tax Parcel #D08-000-014.1



VERIFICATION

BARBARA A. FEIN, ESQUIRE, hereby states that she is the Attorney for the Plaintiff in this action, that she is authorized to make this Affidavit, and that the statements made in the foregoing Civil Action Complaint in Ejectment are true and correct to the best of her knowledge, information and belief.

The undersigned understands that this statement herein is made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

Dated: February 14, 2002

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY: Barbara A. Fein

Barbara A. Fein, Esquire
Attorney for Plaintiff
Attorney I.D. No. 53002

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12171

FEDERAL NATIONAL MORTGAGE ASSOC.

02-267-CD

VS.

ROWLES, ROBERT L. & KIMBERLY S.

COMPLAINT IN EJECTMENT

SHERIFF RETURNS

**NOW MARCH 1, 2002 AT 11:26 AM EST SERVED THE WITHIN COMPLAINT IN
EJECTMENT ON KIMBERLY S. ROWLES, DEFENDANT AT RESIDENCE, RR#1
BOX 371, GRAMPIAN, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO
KIMBERLY S. ROWLES A TRUE AND ATTESTED COPY OF THE ORIGINAL
COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: COUDRIET**

**NOW MARCH 1, 2002 AT 11:26 AM EST SERVED THE WITHIN COMPLAINT IN
EJECTMENT ON ROBERT L. ROWLES, DEFENDANT AT RESIDENCE, RR#1
BOX 371, GRAMPIAN, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO
KIMBERLY ROWLES, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL
COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: COUDRIET**

**NOW MARCH 1, 2002 AT 11:26 AM EST SERVED THE WITHIN COMPLAINT IN
EJECTMENT ON OCCUPANT AT RR#1 BOX 371, GRAMPIAN, CLEARFIELD COUNTY,
PENNSYLVANIA BY HANDING TO KIMBERLY ROWLES A TRUE AND ATTESTED COPY
OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE
CONTENTS THEREOF.**

SERVED BY: COUDRIET

Return Costs

Cost	Description
-------------	--------------------

37.80 SHFF. HAWKINS PAID BY: ATTY.

30.00 SURCHARGE PAID BY: ATTY.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12171

FEDERAL NATIONAL MORTGAGE ASSOC.

02-267-CD

VS.

ROWLES, ROBERT L. & KIMBERLY S.

COMPLAINT IN EJECTMENT

SHERIFF RETURNS

Sworn to Before Me This

30th Day Of April 2002
William A. Shaw

So Answers,

*Chester Hawkins
by Maury Harr*
Chester A. Hawkins
Sheriff

FILED
04/30/2002
APR 30 2002
NO CC

WAS
WAS
William A. Shaw
Prothonotary

THE LAW OFFICES OF BARBARA A. FEIN, P.C.
Barbara A. Fein, Esquire / I.D. No. 53002
Kristen J. DiPaolo, Esquire / I.D. No. 79992
Suite 100, 425 Commerce Drive
Fort Washington, PA 19034
(215) 653-7450
Attorney for Plaintiff

FEDERAL NATIONAL
MORTGAGE ASSOCIATION,
Plaintiff,

v.

ROBERT L. ROWLES,
KIMBERLY S. ROWLES and
OCCUPANTS OF
RR 1 Box 371,
Grampian, PA 16838,
Defendants.

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

NO. 02-267-CO

PRAECIPE TO SETTLE, DISCONTINUE, AND END

TO THE PROTHONOTARY:

Kindly mark the above referenced matter settled, discontinued
and ended without prejudice to Plaintiff.

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY: Barbara A. Fein

Barbara A. Fein, Esquire
Attorney for Plaintiff
Attorney I.D. No. 53002

Dated: May 6, 2002

FILED

MAY 09 2002

William A. Shaw
Prothonotary

FILED

No
cc

310.25
MAY 09 2002

copy of disc to CIA
Disc. to atty

William A. Shaw
Prothonotary

6/10

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

COPY

CIVIL DIVISION

Federal National Mortgage Association

Vs. No. 2002-00267-CD
Robert L. Rowles
Kimberly S. Rowles

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 May 9, 2002 marked:

Settled, Discontinued and Ended without Prejudice

Record costs in the sum of \$147.80 have been paid in full by Barbara A. Fein, Esq..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 9th day of May A.D. 2002.

William A. Shaw, Prothonotary

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

WILLIAM O. HARRIS, *
Plaintiff *
*
- vs - * No.
*
BETTY A. HARRIS, *
Defendant *

COMPLAINT

AND NOW, comes the Plaintiff, William O. Harris, by and through his attorney, Richard H. Milgrub, Esquire, and files the following Complaint in Divorce:

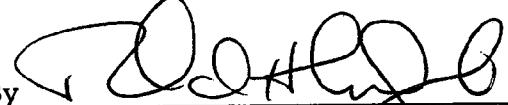
1. Plaintiff is William O. Harris, an adult individual, who currently resides at RD 1, Box 312B, West Decatur, Pennsylvania 16878.
2. Defendant is Betty Harris, an adult individual, who currently resides at 200 Meteor Avenue, Apartment 106, Cambridge, Maryland 21613.
3. Plaintiff and Defendant have been bona fide residents of the Commonwealth of Pennsylvania for at least six months (6) immediately previous to the filing of this Complaint.
4. Plaintiff and Defendant were married on December 26, 1989 at the Souls' Harbor Church of God, Cambridge, Maryland.
5. There have been two (2) prior actions for divorce between the parties. The court, term and number is as follows: Circuit Court for Dorchester County, Maryland No. 09-C-00-009770; and Circuit Court for Dorchester County, Maryland No. C6363. Both actions were withdrawn.

6. Plaintiff avers that he is entitled to a divorce on the ground that the marriage is irretrievably broken. Also, at the appropriate time, Plaintiff may submit an Affidavit alleging that the parties have lived separate and apart for at least two (2) years.

7. That the Plaintiff has been advised of the availability of counseling and furthermore, the Plaintiff has been advised of the right to request that the Court require the parties to participate in counseling.

8. This action is not collusive.

WHEREFORE, Plaintiff requests your Honorable Court to enter a Decree in Divorce, divorcing Plaintiff and Defendant.

By 
Richard H. Milgrub, Esquire
Attorney for Plaintiff

THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

109 NORTH BRADY STREET
DUBOIS, PA 15801

I, William O. Harris, verify that the statements made in the Complaint are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Date: 2/22/02



THE LAW OFFICES OF
RICHARD H. MILGRUB
211 NORTH SECOND STREET
CLEARFIELD, PA 16830

—
109 NORTH BRADY STREET
DUBOIS, PA 15801