

02-471-CD  
ASSOCIATION CONSUMER DISCOUNT -vs- DENNIS L. STEINER  
COMPANY

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

Associates Consumer Discount Company (A Division of CitiFinancial Services, Inc.) 7467 New Ridge Rd, Suite 222 Handover, MD 21076	COURT OF COMMON PLEAS CIVIL DIVISION
Plaintiff	Clearfield County
v.	
Dennis L. Steiner 707 McBride Street Cleafield, PA 16830	NO. 02-471-CO
Defendant(s)	

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.

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**

MAR 28 2002

100 m/11/30/cty/udren  
a William A. Shaw  
Prothonotary pd \$80.00  
1cc Derry

**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 asentear 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. Ademas, 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 IMMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE 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: **N/A**

Assignments of Record to: **N/A**

Recording Date: **N/A**

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 Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 707 McBride Street

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Clearfield

COUNTY: Clearfield

DATE EXECUTED: 11/26/99

DATE RECORDED: 11/30/99 INSTRU: 199919624

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 Mortgage 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 2/5/02:

Principal of debt due and unpaid Interest at 9.89% from 9/01/01 to 2/5/02 (the per diem interest accruing on this debt is \$11.26 and that sum should be added each day after 2/5/02)	\$41,556.45
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 2/5/02)	0.00
Late Charges (monthly late charge of \$0.00 should be added on the fifteenth of each month after 2/5/02)	0.00
Appraisals	225.00
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,077.82</u>
<b>TOTAL</b>	<b>\$46,156.75</b>

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 \$46,156.75 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



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

ALL THAT CERTAIN LOT OF LAND SITUATE IN THE BOROUGH OF CLEARFIELD, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED ON THE SOUTH BY MCBRIDE STREET; ON THE NORTH BY THE ALLEY; ON THE EAST BY LOT NOW OR FORMERLY OF CARL WALL; AND ON THE WEST BY LOT NOW OR FORMERLY OF WILMER F. LIPPERT. BEING SIXTY(60) FEET FRONT ON MCBRIDE STREET BY ONE HUNDRED FIFTY (150) FEET DEEP AND KNOWN AS LOT NO. 10 IN THE MCBRIDE ADDITION.

BEING THE SAME PREMISES CONVEYED TO THE GRANTORS HEREIN BY DEED DAATED MAY 24, 1997, AND RECORDED IN THE RECORDER'S OFFICE OF CLEARFIELD COUNTY IN VOLUME 1852, PAGE 532.

ALSO BEING DESIGNATED AS TAX I.D. NO. 4.3-04996

**ACT 91 NOTICE**

# **TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE**

This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this notice with you when you meet with the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENDRA UNA TRADUCCION IMMEDIATAMENTE LLAMANDA ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

HOMEOWNERS NAME(S): DENNIS STEINER  
PROPERTY ADDRESS: 707 MCBRIDE STREET, CLEARFIELD PA 16830  
LOAN ACCT. NO.: 201020  
ORIGINAL LENDER: ASSOCIATES CONSUMER DISCOUNT COMPANY  
CURRENT LENDER/SERVICER: CITIFINANCIAL SERVICES INC

## 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 PROVISION OF THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.

**TEMPORARY STAY OF FORECLOSURE:** Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the consumer counseling agencies listed at the end of this Notice. **THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS.** IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT", EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.

**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 your for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face-to-face meeting. Advise your lender immediately of your intentions.

**APPLICATION FOR MORTGAGE ASSISTANCE:** Your mortgage is in default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within (30) days of your face-to-face meeting.

**YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.**

**AGENCY ACTION:** Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

**NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT**

**(If you have filed bankruptcy, you can still apply for Emergency Mortgage Assistance.)**

**HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).**

**NATURE OF THE DEFAULT:** The MORTGAGE debt held by the above lender on your property located at:

707 MCBRIDE STREET

CLEARFIELD PA 16830

**A. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following months and the following amounts are now past due:**

OCTOBER 01, 2001 and NOVEMBER 01, 2001

Other charges (explain/itemize):

**TOTAL AMOUNT PAST DUE: \$800.00**

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

**CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY**

Attached is a list of all counseling agencies for the county in which the property is located.

Enclosure: List of Consumer Credit  
Counseling Agencies

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

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12309

ASSOCIATES CONSUMER DISCOUNT COMPANY

02-471-CD

VS.  
STEINER, DENNIS L.

COMPLAINT IN MORTGAGE FORECLOSURE

**SHERIFF RETURNS**

---

NOW APRIL 22, 2002 AT 2:35 PM DST SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON DENNIS L. STEINER, DEFENDANT AT RESIDENCE, 707 MCBRIDE ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JOY STEINER, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

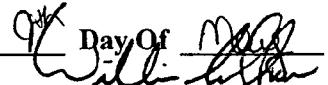
SERVED BY: DAVIS/MORGILLO

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Return Costs

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

Sworn to Before Me This

  
Day Of May 2002

WILLIAM A. SHAW  
Prothonotary  
My Commission Expires  
1st Monday in Jan. 2006  
Clearfield Co., Clearfield, PA

So Answers,

  
Chester A. Hawkins  
Sheriff 

**FILED**  
012:12  
MAY 09 2002

William A. Shaw  
Prothonotary

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

Associates Consumer Discount  
Company (A Division of  
CitiFinancial Services, Inc.  
7467 New Ridge Rd, 222  
Handover, MD 21076

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

Plaintiff

v.

Dennis L. Steiner  
707 McBride Street  
Cleafield, PA 16830

NO. 02-471-CD

JUN 04 2002

Defendant(s)

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	\$46,156.75
Interest Per Complaint	1,272.38
From 2/6/02 to 5/29/02	
TOTAL	
	<u>\$47,429.13</u>

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: 6-4-02

PRO PROTHY

*William A. Shaw*

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

**COPY**

Associates Consumer Discount : COURT OF COMMON PLEAS  
Company : A Division of : CIVIL DIVISION  
CitiFinancial Services, Inc. : Clearfield County  
7467 New Ridge Rd, 222 : MORTGAGE FORECLOSURE  
Handover, MD 21076

Plaintiff

v.

Dennis L. Steiner : NO. 02-471-CD  
707 McBride Street  
Cleafield, PA 16830

Defendant(s)

TO: Dennis L. Steiner  
707 McBride Street  
Cleafield, PA 16830

NOTICE

Pursuant to Rule 236 of the Supreme Court cf 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

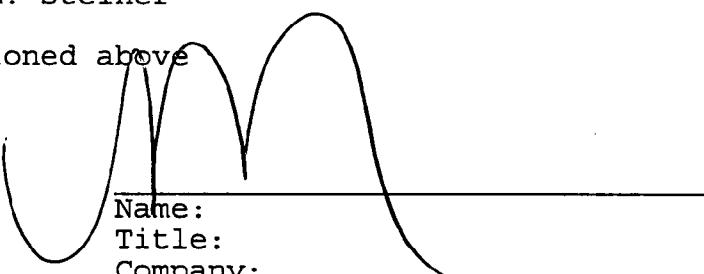
Associates Consumer Discount Company (A Division of CitiFinancial Services, Inc. 7467 New Ridge Rd, 222 Handover, MD 21076	COURT OF COMMON PLEAS CIVIL DIVISION Clearfield County MORTGAGE FORECLOSURE
Plaintiff	:
v.	NO. 02-471-CD
Dennis L. Steiner 707 McBride Street Cleafield, PA 16830	:
Defendant(s)	:

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF :  
: SS  
COUNTY OF :

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: Dennis L. Steiner  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

  
Name:  
Title:  
Company:

Sworn to and subscribed  
before me this 16 day  
of May 2002.

Andrea Schaber  
Notary Public

ANDREA SCHABER  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires Dec. 9, 2002

**COPY**

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

Associates Consumer Discount Company  
Plaintiff(s)

No.: 2002-00471-CD

Real Debt: \$47,429.13

Atty's Comm:

Vs. Costs: \$

Int. From:

Dennis L. Steiner Entry: \$20.00  
Defendant(s)

Instrument: Default Judgment

Date of Entry: June 4, 2002

Expires: June 4, 2007

Certified from the record this 4th of June, 2002

---

William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

Received on \_\_\_\_\_, \_\_\_\_\_, of defendant full satisfaction of this Judgment, Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

---

Plaintiff/Attorney

**FILED**

JUN 04 2002

MP:321ath, under per \$20.00  
William A. Shaw  
Prothonotary notice to pay

Costs to 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

Associates Consumer Discount  
Company (A Division of  
CitiFinancial Services, Inc.  
7467 New Ridge Rd, 222  
Handover, MD 21076

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

Plaintiff

v.

Dennis L. Steiner  
707 McBride Street  
Cleafield, PA 16830

NO. 02-471-CD

Defendant(s)

**PRAECIPE FOR WRIT OF EXECUTION**

**TO THE SHERIFF:**

Issue Writ of Execution in the above matter:

Amount due \$47,429.13

Interest From May 30, 2002  
to Date of Sale \_\_\_\_\_  
Per diem @\$11.26

(Costs to be added) \$ \_\_\_\_\_

MARK J. UDREN & ASSOCIATES  
Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

**FILED**

JUN 04 2002

William A. Shaw  
Prothonotary

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

**COPY**

Associates Consumer Discount  
Company (A Division of  
CitiFinancial Services, Inc.  
7467 New Ridge Rd, 222  
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COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

Plaintiff

v.

Dennis L. Steiner  
707 McBride Street  
Cleafield, PA 16830

NO. 02-471-CD

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:

707 McBride Street, Clearfield, PA 16830  
SEE LEGAL DESCRIPTION ATTACHED

Amount due	<u>\$47,429.13</u>
Interest From <u>May 30, 2002</u>	
to Date of Sale	
Per diem @ \$11.26	
Prothonotary Costs: (Costs to be added)	\$ <u>150.00</u>

By Willie L. Shan  
Prothonotary  
Clerk

Date June 4, 2002

COURT OF COMMON PLEAS  
NO. 02-471-CD

Associates Consumer Discount Company (A Division of  
Citifinancial Services, Inc.

Dennis L. Steiner

vs.

===== WRIT OF EXECUTION =====

REAL DEBT \$ 47,429.13

INTEREST \$ from May 30, 2002 to  
Date of Sale \_\_\_\_\_  
Per diem @ \$11.26

COSTS PAID:  
PROTHY \$ 150.00

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

STATUTORY \$ \_\_\_\_\_

COSTS DUE PROTHY. \$ \_\_\_\_\_

PREMISES TO BE SOLD:  
107 McBride Street, Clearfield, PA 16830

**FILED**

JUN 04 2002

M/9.23 [initials] Uden  
William A. Shaw  
Prothonotary pd. \$20.00

6 units \$1000  
per

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

ALL THAT CERTAIN LOT OF LAND SITUATE IN THE BOROUGH OF CLEARFIELD, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED ON THE SOUTH BY MCBRIDE STREET; ON THE NORTH BY THE ALLEY; ON THE EAST BY LOT NOW OR FORMERLY OF CARL WALL; AND ON THE WEST BY LOT NOW OR FORMERLY OF WILMER F. LIPPERT. BEING SIXTY(60) FEET FRONT ON MCBRIDE STREET BY ONE HUNDRED FIFTY (150) FEET DEEP AND KNOWN AS LOT NO. 10 IN THE MCBRIDE ADDITION.

BEING THE SAME PREMISES CONVEYED TO THE GRANTORS HEREIN BY DEED DAATED MAY 24, 1997, AND RECORDED IN THE RECORDER'S OFFICE OF CLEARFIELD COUNTY IN VOLUME 1852, PAGE 532.

ALSO BEING DESIGNATED AS TAX I.D. NO. 4.3-04996

BEING KNOWN AS 707 MCBRIDE STREET, CLEARFIELD, PA 16830

PROPERTY ID: 4.3-K08-212-00053

TITLE TO SAID PREMISES IS VESTED IN DENNIS L. STEINER BY DEED FROM DENNIS L. STEINER AND WICKIE L. STEINER, HUSBAND AND WIFE, DATED 8/31/1999, RECORDED 8/31/1999, IN INSTRUMENT 199914435

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

Associates Consumer Discount  
Company (A Division of  
CitiFinancial Services, Inc.  
7467 New Ridge Rd, 222  
Handover, MD 21076  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Dennis L. Steiner  
707 McBride Street  
Cleafield. PA 16830  
Defendant(s)

NO. 02-471-CD

**AMENDED 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 Praeclipe 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: August 14, 2002

MARK J. UDREN & ASSOCIATES

BY:

Mark J. Udren, Esquire  
Attorney for Plaintiff

**FILED**

AUG 21 2002

11321NCL  
William A. Shaw  
Prothonotary

Name and  
Address  
Of Sender  
**JODIE**

**LAW OFFICES OF MARK J. UDREN &  
ASSOCIATES  
1040 N. KING'S HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034**

Line	Article Number	Name of Addressee, Street, and Post Office Address	Check appropriate block for Registered Mail: <input type="checkbox"/> Merchandise <input type="checkbox"/> Int'l Recorded Del. <input type="checkbox"/> Express Mail			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
			<input type="checkbox"/> Insured COD	<input type="checkbox"/> Certified	<input type="checkbox"/> With Postal Insurance <input type="checkbox"/> Without postal Insurance											
1	0230964	CLEARFIELD COUNTY TAX CLAIM BUREAU 1 NORTH SECOND STREET, SUITE 116, CLEARFIELD, PA 16830														
2	STEINER	DOMESTIC RELATIONS SECTION 1 NORTH SECOND STREET, SUITE 116, CLEARFIELD, PA 16830														
3		COMMONWEALTH OF PA, DEPT. OF REVENUE, BUREAU OF COMPLIANCE, DEPT. 280946, HARRISBURG, PA 17128-0946														
4		TENANTS/OCCUPANTS 707 MCBRIDE STREET, CLEARFIELD, PA 16830														
5	CLEARFIELD COUNTY															
6																
7																
8																
9																
10																
11																
12																
13																
14																
15																

Total number of  
Pieces Listed by  
Sender

Postmaster, Per (Name of Receiving Employee)

Total Number of  
Pieces Received at Post Office

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

Postmark and Date of Receipt

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.

**EXHIBIT A**

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12779

ASSOCIATES CONSUMER DISCOUNT COMPANY ET AL

02-471-CD

VS.

STEINER, DENNIS L.

WRIT OF EXECUTION REAL ESTATE

**SHERIFF RETURNS**

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NOW, JULY 16, 2002 @ 1:20 P.M. LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDANT, DENNIS L. STEINER. PROPERTY WAS ALSO POSTED THIS DATE AND TIME.

A SALE WAS SET FOR SEPTEMBER 6, 2002.

NOW, AUGUST 8, 2002 @ 2:30 P.M. SERVED DENNIS L. STEINER AT HIS RESIDENCE 515 EAST 4TH STREET, APT 1, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO JOY PHILLIPS ADULT AT RESIDENCE, A TRUE AND ATTESTED ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF LEVY AND MADE KNOWN TO HER THE CONTENTS THEREOF.

NOW, AUGUST 13, 2002 RECEIVED FAX TO CONTINUE SALE TO OCTOBER 4, 2002 TO ALLOW TIME FOR SERVICE.

NOW, OCTOBER 4, 2002 A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANT, DENNIS L. STEINER. THE PROPERTY WAS SOLD TO THE PLAINTIFF FOR \$1.00 + COSTS.

NOW, OCTOBER 15, 2002 BILLED ATTORNEY FOR COSTS DUE.

NOW, OCTOBER 22, 2002 RECEIVED CHECK FROM ATTORNEY FOR COSTS.

NOW, NOVEMBER 6, 2002 PAID COSTS FROM ADVANCE AND ATTORNEY CHECK.

NOW, NOVEMBER 6, 2002 RETURN WRIT AS SALE BEING HELD. PROPERTY PURCHASED BY THE PLAINTIFF FOR \$1.00 + COSTS.

DEED FILED NOVEMBER 6, 2002.

**FILED**  
03:24 BA 9<sup>th</sup> 5-02  
NOV 06 2002

William A. Shaw  
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12779

ASSOCIATES CONSUMER DISCOUNT COMPANY ET AL

02-471-CD

VS.  
STEINER, DENNIS L.

WRIT OF EXECUTION REAL ESTATE

**SHERIFF RETURNS**

---

**SHERIFF HAWKINS \$205.44**

**SURCHARGE \$20.00**

**PAID BY ATTORNEY**

---

Sworn to Before Me This  
\_\_\_\_ Day Of \_\_\_\_\_ 2002

So Answers,

*Chester Hawkins* Aughencough  
By *Cynthia Butler*  
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

Associates Consumer Discount  
Company (A Division of  
CitiFinancial Services, Inc.  
7467 New Ridge Rd, 222  
Handover, MD 21076

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

Plaintiff

v.

Dennis L. Steiner  
707 McBride Street  
Cleafield, PA 16830

NO. 02-471-CD

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:

707 McBride Street, Clearfield, PA 16830  
SEE LEGAL DESCRIPTION ATTACHED

Amount due	<u>\$47,429.13</u>
Interest From May 30, 2002 to Date of Sale _____ Per diem @ \$11.26	
Prothonotary Costs: (Costs to be added)	\$ 150.00

Prothonotary  
By Willie L. Blair  
Clerk

Received 6/4/02 @ 10:47 a.m. Date June 4, 2002  
Chester A. Waukins  
by Cynthia Butler-Augustaugh

COURT OF COMMON PLEAS  
NO. 02-471-CD

Associates Consumer Discount Company (A Division of  
CitiFinancial Services, Inc.)

vs.

Dennis L. Steiner

WRIT OF EXECUTION

REAL DEBT \$ 47,429.13

INTEREST \$

from May 30, 2002 to

Date of Sale \_\_\_\_\_

Per diem @ \$11.26

COSTS PAID:  
PROTHY \$ 150.00

SHERIFF \$

STATUTORY \$

COSTS DUE PROTHY. \$

PREMISES TO BE SOLD:

107 McBride Street, Clearfield, PA 16830

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

ALL THAT CERTAIN LOT OF LAND SITUATE IN THE BOROUGH OF CLEARFIELD, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED ON THE SOUTH BY MCBRIDE STREET; ON THE NORTH BY THE ALLEY; ON THE EAST BY LOT NOW OR FORMERLY OF CARL WALL; AND ON THE WEST BY LOT NOW OR FORMERLY OF WILMER F. LIPPERT. BEING SIXTY(60) FEET FRONT ON MCBRIDE STREET BY ONE HUNDRED FIFTY (150) FEET DEEP AND KNOWN AS LOT NO. 10 IN THE MCBRIDE ADDITION.

BEING THE SAME PREMISES CONVEYED TO THE GRANTORS HEREIN BY DEED DAATED MAY 24, 1997, AND RECORDED IN THE RECORDER'S OFFICE OF CLEARFIELD COUNTY IN VOLUME 1852, PAGE 532.

ALSO BEING DESIGNATED AS TAX I.D. NO. 4.3-04996

BEING KNOWN AS 707 MCBRIDE STREET, CLEARFIELD, PA 16830

PROPERTY ID: 4.3-K08-212-00053

TITLE TO SAID PREMISES IS VESTED IN DENNIS L. STEINER BY DEED FROM DENNIS L. STEINER AND WICKIE L. STEINER, HUSBAND AND WIFE, DATED 8/31/1999, RECORDED 8/31/1999, IN INSTRUMENT 199914435

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME STEINER NO. 02-471-CD

NOW, October 4, 2002, 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 for the date, time and place of sale at the court House in Clearfield on the 4TH day of OCTOBER 2002, I exposed the within described real estate of DENNIS L. STEINER to public venue or outcry at which time and place I sold the same to ASSOCIATES CONSUMER DISCOUNT COMPANY (A DIVISION OF CITIFINANCIAL SERVICES, INC.) he/she being the highest bidder, for the sum of \$1.00 + COSTS and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	15.00
SERVICE	15.00
MILEAGE	2.00
LEVY	15.00
MIELAGE	2.00
POSTING	15.00
CSDS	10.00
COMMISSION 2%	
POSTAGE	4.44
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	6.00
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES/BILLING	15.00
	5.00
BILLING/PHONE/FAX	15.00
<b>TOTAL SHERIFF COSTS</b>	<b>205.44</b>
<b>DEED COSTS:</b>	
ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	18.50
TRANSFER TAX 2%	
<b>TOTAL DEED COSTS</b>	<b>18.50</b>

**DEBIT & INTEREST:**

DEBT-AMOUNT DUE	47,429.13
INTEREST FROM 5/30/02 SALE DATE PER	
TO BE ADDED	DIEM @ \$11.26
<b>TOTAL DEBT &amp; INTEREST</b>	<b>47,429.13</b>
<b>COSTS:</b>	
ATTORNEY FEES	
PROTH. SATISFACTION	
ADVERTISING	308.70
LATE CHARGES & FEES	
TAXES - collector	895.87
TAXES - tax claim	2,144.28
DUE	
COST OF SUIT - TO BE ADDED	
LIEN SEARCH	200.00
FORCLOSURE FEES/ESCROW DEFICIT	
ACKNOWLEDGEMENT	5.00
DEED COSTS	28.50
ATTORNEY COMMISSION	
SHERIFF COSTS	205.44
LEGAL JOURNAL AD	148.50
REFUND OF ADVANCE	
REFUND OF SURCHARGE	
PROTHONOTARY	150.00
MORTGAGE SEARCH	80.00
<b>SATISFACTION FEE</b>	
<b>ESCROW DEFICIENCY</b>	
<b>MUNICIPAL LIEN</b>	
<b>TOTAL COSTS</b>	<b>4,166.29</b>

DISTRIBUTION WILL BE MADE IN ACCORDANCE WITH THE ABOVE SCHEDULE UNLESS EXCEPTIONS ARE FILED WITH THIS OFFICE **WITHIN TEN (10) DAYS FROM THIS DATE.**

CHESTER A. HAWKINS, Sheriff

**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

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

**FREDDIE MAC  
PENNSYLVANIA  
DESIGNATED COUNSEL**

**PLEASE RESPOND TO NEW JERSEY OFFICE**

August 13, 2002

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

Clearfield County Sheriff's Office  
Clearfield County Courthouse  
1 North Second Street, Suite 116  
Clearfield, PA 16830  
ATTN: Cindy

Re: Associates Consumer Discount Company (A Division of  
CitiFinancial Services, Inc.  
vs.  
Dennis L. Steiner  
Clearfield County C.C.P. No. 02-471-CD  
Premises: 707 McBride Street, Clearfield, PA 16830  
SS Date: September 6, 2002

Dear Cindy:

Please Postponethe Sheriff's Sale scheduled for September 6, 2002  
to October 4, 2002.

Sale is postponed for the following reason:

To allow time for Service of the Notice of Sale.

Thank you for your attention to this matter.

Sincerely yours,



Mark J. Udren  
MARK J. UDREN & ASSOCIATES

/jlb

*Received  
8/13/02*