

02-1250-CD  
C & S SAVINGS BANK -vs- SAMUEL K. DIXON et al.

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

**Plaintiff,**

1

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased.

Defendant

**TO: DEFENDANT:**

TO: DEFENDANT:  
YOU ARE HEREBY NOTIFIED TO PLEAD TO THE  
ENCLOSED COMPLAINT WITHIN TWENTY (20) DAYS  
FROM SERVICE HEREOF OR A DEFAULT JUDGMENT  
MAY BE ENTERED AGAINST YOU.

WELTMAN, WEINBERG & REIS CO., L.P.A.  
By:   
ATTORNEYS FOR PLAINTIFF

I HEREBY CERTIFY THE ADDRESS OF PLAINTIFF IS:  
P.O. Box 2060  
Alliance, OH 44601

AND THE DEFENDANT ARE:  
RD 1, Box 494  
Morrisdale, PA 16858

WELTMAN, WEINBERG & REIS CO., L.P.A.

BY: ATTORNEYS FOR PLAINTIFF

I HEREBY CERTIFY THAT THE LOCATION OF THE REAL  
ESTATE AFFECTED BY THIS LIEN IS:  
RD 1, Box 494  
Morrisdale, PA 16858  
Twp of Graham  
WEITMAN, WEINBERG & REIS CO., L.P.A.

BY:   
ATTORNEYS FOR PLAINTIFF

NO. 02-1250 CO

ISSUE NO.:

CODE:

## COMPLAINT IN MORTGAGE FORECLOSURE

FILED ON BEHALF OF:  
PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

Kimberly J. Hong, ESQUIRE  
Pa. I.D. #74950

WELTMAN, WEINBERG & REIS CO., L.P.A.  
Firm #339  
2718 KOPPERS BUILDING  
436 SEVENTH AVENUE  
PITTSBURGH, PA 15219  
(412) 434-7955  
WWR#02663143

3  
FILED

AUG 12 2002 Case  
m 12:14 (atty Hong pd 80.00  
William A. Shaw ILL atty.  
Prothonotary

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250-CD

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

**NOTICE TO DEFEND**

**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:**

PA Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

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

C&G SAVINGS BANK, s/i/i/t  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO: 22-1250-CD

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

CIVIL ACTION - COMPLAINT IN MORTGAGE FORECLOSURE

And now, comes Plaintiff, C&G Savings Bank, s/i/i/t Family Mobile Homes, Inc., by and through its attorneys, WELTMAN, WEINBERG & REIS CO., L.P.A., and files this Complaint in Mortgage Foreclosure, averring in support thereof the following:

1. The Plaintiff is C&G Savings Bank, s/i/i/t Family Mobile Homes, Inc., a lending institution duly authorized to conduct business within the Commonwealth of Pennsylvania (hereinafter "Plaintiff").

2. The Defendant is Unknown Heirs, Successors, Assigns and all persons, firms, or associations claiming right, title and interest from or under Samuel K. Dixon, deceased, whose last known address is RD1, Box 494, Morrisdale, PA 16858.

3. On or about May 29, 1991, Samuel K. Dixon borrowed the sum of \$24,177.00 from Plaintiff pursuant to the terms of a written agreement, and as security for repayments thereof, Samuel K. Dixon made, executed and delivered to Plaintiff, a Mortgage in the original principal amount of \$24,177.00 on the premises hereinafter described, said Mortgage being recorded in the Office of the Recorder of Deeds of Clearfield County on June 5, 1991 in Mortgage Book Volume 1401, Page 43. A true and correct copy of said Mortgage containing a description of the premises subject to said Mortgage is marked Exhibit "A", attached hereto and made a part hereof.

4. Family Mobile Homes, Inc., assigned all of its right, title and interest in and to the Mortgage to Columbia Savings Association, pursuant to an Assignment of Mortgage, which was recorded on July 22, 2001, in Mortgage Book Volume 1409, Page 24.

5. Columbia Savings Association, assigned all of its right, title and interest in and to the Mortgage to C&G Savings Bank, pursuant to an Assignment of Mortgage

6. Plaintiff believes and therefore avers that Samuel K. Dixon is deceased.

7. Samuel K. Dixon was the current record and real owner of the aforesaid mortgaged premises at the time of his death.

8. The aforesaid Note and Mortgage are in default.

9. Demand for payment has been made upon the Defendant by Plaintiff, but Defendant was unable to pay the principal balance, interest or any other portion thereof to Plaintiff.

10. On or about April 19, 2002, Defendant was mailed Notice of Homeowner's Emergency Assistance Act of 1983, in compliance with the Homeowner's Emergency Assistance Act, Act 91 of 1983 and pursuant to 12 PA Code Chapter 31, Subchapter B, Section 31.201 et seq.

11. The amount due and owing Plaintiff is as follows:

Principal	\$ 12,619.98
Interest thru 7/18/02	\$ 816.53
Late Charge thru 7/18/02	\$ 0.00
Execution Costs thru 7/18/02	\$ 0.00
Attorneys' Fees thru 7/18/02	\$ 1,000.00
Other Charges	<u>\$ 50.00</u>
 TOTAL	 \$ 14,486.51

12. Contemporaneously hereunder, Defendant has been advised of the right to dispute the validity of this debt or any part thereof, pursuant to the Fair Debt Collection Practices Act 30 Day Notice, attached hereto marked Exhibit "C" and made a part hereof.

WHEREFORE, Plaintiff demands judgment in Mortgage Foreclosure for the amount due of \$14,486.51, with interest thereon at the rate of \$4.49 per diem from July 18, 2002, plus costs, in addition to late charges and for foreclosure and sale of mortgaged premises.

**THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED SHALL BE USED FOR THAT PURPOSE.**

WELTMAN, WEINBERG & REIS CO., L.P.A.



---

Kimberly J. Hong, Esquire  
Pa. I.D. #74950  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

VOL 1401 PAGE 043

## REAL ESTATE MORTGAGE

THIS MORTGAGE, made and entered into this 29th day of May 1991 by and between the undersigned, Samuel K. Dixon, herein called "Mortgagor", and FAMILY MOBILE HOMES, INC., a Pennsylvania Association having an office and place of business at 1683 E. Pleasant Valley Blvd., Altoona, Pennsylvania 16602, herein called "Mortgagor".

WITNESSETH, that to secure payment by Mortgagor of a Promissory Note of even date herewith, in the total amount of fifty-five thousand thirty-three and 20/xx Dollars (\$ 55,033.20), principal sum of Twenty-four thousand one hundred seventy-seven and 00/xx Dollars (\$ 24,177.00), bearing interest at an annual rate of 12.99% payable in 180 consecutive monthly installments of three hundred seventy-five and 74/xx Dollars (\$ 375.74) each (and/or any renewal, refinancing or extension thereof, or other Promissory Note or other agreement to pay which may be substituted therefor, any or all of which are hereinafter referred to as "Promissory Note") and all other obligations of Mortgagor under the terms and provisions of this Mortgage, and obligations which Mortgagor may hereafter, from time to time become obligated to Mortgagor for payment of, or for additional sums of money advanced by Mortgagor, and it is intended that all of said future advances, debts, or obligations, with interest thereon, will be secured hereby in addition to the advances, debts and obligations presently owing by Mortgagor. Mortgagor does by these presents sell, grant and convey to Mortgagor, ALL that real estate situated in the County of Clearfield (City, Borough, Township) of

Graham Ward known and numbered as  
R.D. 1 Box 493 Morrisdale, Pa, 16858  
 Street Address  
 Pennsylvania, and described in Deed recorded in the Recorder's Office of said County at Deed Book Volume 1150  
 Page 433 and more particularly described as:  
 see attached Exhibit A

City, Town, Post Office

TOGETHER with all the buildings and improvements thereon and additions thereto, including all alleys, passageways, rights, liberties, privileges, hereditaments and appurtenances whatsoever thereunto belonging, or appurtenant, herein called the Mortgaged Premises.

TO HAVE AND TO HOLD the Mortgaged Premises hereby granted and conveyed unto Mortgagor, to and for the use and benefit of Mortgagor, its successors and assigns, forever.

THIS MORTGAGE IS MADE subject to the following conditions, and Mortgagor agrees:

1. Mortgagor will make all payments on the due date thereof and perform all other obligations as required or provided herein and in said Promissory Note, Mortgagor, at its option, may defer the payment date of all wholly unpaid installments one or more full months and charge a deferral charge therefor which shall be equal to the interest charge applicable to the month or months in which any installment is not required by reason of a deferral.
2. Mortgagor will pay when due all taxes and assessments levied or assessed against said premises or any part thereof, and will deliver receipts therefor to the Mortgagor upon request.
3. Mortgagor will keep the improvements on said property constantly insured against fire and such other hazards, in such amount and with such carriers as Mortgagor shall require, with loss if any payable to Mortgagor as its interest may appear.
4. Mortgagor will neither commit nor suffer any stop, waste, impairment or deterioration of the mortgaged premises, and will maintain the same in good order and repair.
5. In the event that Mortgagor defaults in the making of any payment due and payable under said Combined Promissory Note and Federal Disclosure Statement, or in the keeping and performance by Mortgagor of any of the conditions or covenants of this Mortgage or said Combined Promissory Note and Federal Disclosure Statement, Mortgagor may forthwith bring an Action of Mortgage Foreclosure hereon, or institute other foreclosure proceedings upon this Mortgage, and may proceed to judgement and execution to recover the balance due on said Promissory Note and any other sums that may be due hereunder including reasonable attorney fees, costs of suit, and costs of sale together with interest after judgement at the applicable rate until the full amount due Mortgagor is paid. In the event Mortgagor fails to maintain insurance against fire and such other hazards as Mortgagor requires, Mortgagor authorizes Mortgagor at its option to obtain such insurance and bill Mortgagor for all costs thereof, which such costs Mortgagor agrees to pay, or to add such costs to the then remaining paid principal balance of Mortgagor's Promissory Note and charge interest thereon at the rate of interest contained in such Note.
6. Mortgagor agrees that this mortgage is security for the payment of the aforesaid obligations and all other direct or contingent liabilities of the Mortgagor herself to the Mortgagor herself due or to become due whether now existing or hereafter contracted.
7. If all or part of the sums secured by this Mortgage are lent to the Mortgagor to acquire title to the property, this Mortgage is hereby declared to be a Purchase Money Mortgage.
8. Mortgagor hereby waives and releases all benefits and relief from any and all appraisal, stay and exemption laws, now in force or hereafter passed, either for the benefit or relief of Mortgagor, or limiting the balance due under said Promissory Note to a sum not in excess of the amount actually paid by the purchaser of the Mortgaged Premises at a sale thereof in

WL 1401 PAGE 044

## Exhibit "A"

RECORDING at an iron pipe which is the common corner of George Ogden, Norman A. and Janice M. Parks and the property to be described for Grantee; thence along lands of Norman A. and Janice M. Parks, North eighty-eight degrees, forty-two minutes West (N 88° 42' W) one hundred sixty and thirty-nine hundredths feet (160.39), to an iron pipe; thence still along lands of Norman A. and Janice M. Parks, South no degrees, forty-eight minutes, fifteen seconds East (S 0° 48' 15" E) two hundred forty-three and twenty-seven hundredths feet (243.27) to an iron pipe and the Northwest corner of James J. Dixon; thence along lands of James J. Dixon, North eighty-nine degrees, eleven minutes, forty-five seconds West (N 89° 11' 45" W) six hundred fifty-five and fifty-three hundredths feet (655.53) to an iron pipe on line of Charles Chilcott; thence along lands of Charles Chilcott, North two degrees, twenty-one minutes, fifteen seconds East (N 2° 21' 15" E) five hundred forty-four and sixty-five hundredths feet (544.65) to an iron pipe and the Southwest corner of Ann Rothrock; thence along lands of Ann Rothrock, South eighty-eight degrees, fifty-five minutes, thirty-five seconds East (S 88° 55' 35" E) seven hundred seventy-three and ninety-three hundredths feet (773.93) to an iron pipe and the Northwest corner of George Ogden; thence along lands of George Ogden, South four degrees, twenty-four minutes East (S 04° 24' E) three hundred feet (300.0) to an iron pipe and place of beginning.

CONTAINING 9.08 acres and being part of the same premises that were conveyed to Samuel and Marion Dixon and recorded in Clearfield in deed book 406, page 310. The said Marion Dixon having predeceased her husband, the hereinabove described premises became vested in Samuel Dixon as surviving tenant by the entireties. The said Samuel Dixon having died on February 1, 1987, and by his Last Will and Testament, dated January 26, 1984, and duly entered by probate in the Office of the Register of Wills of Clearfield County, Pennsylvania, in file No. 87-49, at Will Book Volume 56, page 480, did give, devise and bequeath his real estate, including the herein described premises, to Samuel I. Dixon and Janice M. Parks, the Grantees herein.

EXCEPTING AND RESERVING all exceptions and reservations as contained in prior deeds.



## FAIR DEBT COLLECTION PRACTICES ACT 30 DAY NOTICE

By law, this law firm is required to advise you that unless within 30 days after receipt of this notice you dispute the validity of this debt or any portion thereof, the debt will be assumed to be valid by us. If said notification is sent to us in writing, we are required to provide you with verification of the debt. In the event within a 30-day period you request in writing the name of the original creditor, it will be provided to you if different from the current creditor. In the event that you dispute the debt and/or request the name of the original creditor in writing within the 30-day period, no further action will be taken to obtain Judgment in the pending lawsuit until the verification and/or name of the original creditor has been provided to you.

This law firm is attempting to collect this debt for our client and any information obtained will be used for that purpose.

The above Notice is being given pursuant to the Fair Debt Collection Practices Act and is separate and distinct from the foregoing Complaint which must be responded to in conformity with the instructions therein. Because of the difference in time parameters, we will not move for Default Judgment for at least thirty (30) days from the date of service of this Complaint upon you, and if you request verification, we will not move for Default judgment until a reasonable time after verification has been provided, and after the expiration of the thirty (30) day period from the date of service.

VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, she is an attorney for the Plaintiff herein; makes this Verification based upon the facts as supplied to her by the Plaintiff and/or its agents and because the Plaintiff is outside the jurisdiction of the court and the Plaintiff's Verification cannot be obtained within the time allowed for filing of this pleading, and that the facts set forth in the foregoing pleading are true and correct to the best of her knowledge, information and belief.



Kimberly J. Hong, Esquire

9-12-02 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Willie L. Chan  
Deputy Prothonotary

10-4-02 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Willie L. Chan  
Deputy Prothonotary

21 Apr 03 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Willie L. Chan  
Deputy Prothonotary

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,  
v.  
CASE NO. : 02-1250 CD

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

CODE:

TYPE OF PLEADING:

Defendant  
**MOTION FOR SERVICE OF COMPLAINT  
IN MORTGAGE FORECLOSURE  
PURSUANT TO SPECIAL ORDER OF  
COURT AND ORDER OF COURT**

FILED ON BEHALF OF:  
PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

Kimberly J. Hong, ESQUIRE  
Pa. I.D. #74950

WELTMAN, WEINBERG & REIS CO., L.P.A.  
Firm #339  
2718 KOPPERS BUILDING  
436 SEVENTH AVENUE  
PITTSBURGH, PA 15219  
(412) 434-7955  
WWR#02663143

**FILED**

AUG 29 2002

William A. Shaw  
Prothonotary

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,  
v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

**MOTION FOR SERVICE OF COMPLAINT IN MORTGAGE FORECLOSURE PURSUANT TO  
SPECIAL ORDER OF COURT**

Plaintiff, C&G Savings Bank, assignee of Family Mobile Homes, inc., by and through its attorneys, WELTMAN, WEINBERG & REIS CO., L.P.A., and files this Motion for Service of Complaint in Mortgage Foreclosure Pursuant to Special Order of Court under Pennsylvania Rule of Civil Procedure 430 as follows:

1. On or about August 12, 2002, Plaintiff filed a Complaint in Mortgage Foreclosure against Defendant, Unknown Heirs, Successors, Assigns, and all persons, firms, or associations claiming right title and interest from or under Samuel K. Dixon, deceased, at the above-captioned number and term.

2. Plaintiff has no knowledge of an estate being opened for Samuel K. Dixon, deceased. Plaintiff has not been notified as to whether there are any other heirs or an executor to the estate of Samuel K. Dixon.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court permit Plaintiff to serve Defendant, Unknown Heirs, Successors, Assigns, and all persons, firms, or associations claiming right title and interest from or under Samuel K. Dixon, deceased, by directing the Sheriff of Clearfield County to post the property at RD1, Box 494, Morrisdale, PA 16858, and by publication pursuant to Pa. R.C.P. Rule 430 (b) (2) in one legal journal and one newspaper of general circulation. Service of the Complaint shall be deemed complete and valid upon mailing and publication by the Plaintiff and by posting by the Sheriff.

WELTMAN, WEINBERG & REIS CO., L.P.A.



---

Kimberly J. Hong, Esquire  
Pa. I.D. #74950  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that true and correct copies of the within Motion for Service of Complaint in Mortgage Foreclosure Pursuant to Special Order of Court and Order of Court were mailed to the following on this 27th day of August, 2002, by first class, U.S. Mail, postage pre-paid:

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased  
RD1, Box 494  
Morrisdale, PA 16858

Respectfully Submitted:

WELTMAN, WEINBERG & REIS CO., L.P.A.



---

Kimberly J. Hong, Esquire  
Pa. I.D. #74950  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,  
v.

NO: 02-1250-CA

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

ORDER OF COURT

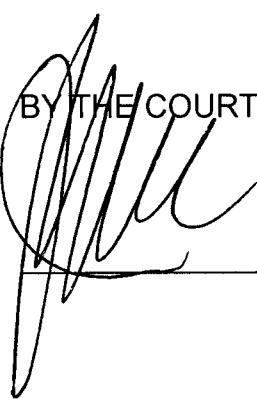
AND NOW, to wit, this 30<sup>th</sup> day of August, 2001, upon consideration  
of the within Motion for Special Service of the Complaint in Mortgage Foreclosure Pursuant to  
Special Order of Court, it is hereby ORDERED, ADJUDGED and DECREED that the Plaintiff is  
permitted to serve Defendant, Unknown Heirs, Successors, Assigns, and all persons, firms, or  
associations claiming right title and interest from or under Samuel K. Dixon, deceased, by  
directing the Sheriff of Clearfield County to post the property at RD1, Box 494, Morrisdale, PA  
16858, and by publication pursuant to Pa. R.C.P. Rule 430 (b) (2) in one legal journal and one  
newspaper of general circulation. Service of the Complaint shall be deemed complete and valid  
upon mailing and publication by the Plaintiff and by posting by the Sheriff.

FILED

AUG 30 2002

William A. Shaw  
Prothonotary

BY THE COURT:



J.

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

NO.: 02-1250-CD

Plaintiff,  
vs.

ISSUE NO.:

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

CODE:

TYPE OF PLEADING:

Defendants.

**PRAECIPE TO REINSTATE COMPLAINT  
IN MORTGAGE FORECLOSURE**

FILED ON BEHALF OF:  
PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

Kimberly J. Hong, ESQUIRE  
Pa. I.D. #74950

WELTMAN, WEINBERG & REIS CO., L.P.A.  
Firm #339  
2718 KOPPERS BUILDING  
436 SEVENTH AVENUE  
PITTSBURGH, PA 15219  
(412) 434-7955  
WWR#02663143

**FILED**

SEP 12 2002

William A. Shaw  
Prothonotary

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

NO.: 02-1250-CD

Plaintiff,  
vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendants.

PRAECIPE TO REINSTATE COMPLAINT

Kindly reinstate the Complaint in the above-captioned matter.

WELTMAN, WEINBERG & REIS CO., L.P.A.



---

Kimberly J. Hong, Esquire  
Pa. I.D. #74950  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

9-12-02

Document

Reinstated/Reissued to Sheriff/Attorney  
for service.

William A. Shaw  
Deputy Prothonotary

Atty Ad. 7.00  
M 12:30 PM  
SEP 12 2002  
2 cc Precepe to Sheriff

William A. Shaw  
Prothonotary  
2 Complaints reinstated  
to Sheriff

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

NO.: 02-1250-CD

Plaintiff,  
vs.

ISSUE NO.:

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

CODE:

TYPE OF PLEADING:

Defendants.

**PRAECIPE TO REINSTATE COMPLAINT  
IN MORTGAGE FORECLOSURE**

FILED ON BEHALF OF:  
PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

Kimberly J. Hong, ESQUIRE  
Pa. I.D. #74950

WELTMAN, WEINBERG & REIS CO., L.P.A.  
Firm #339

2718 KOPPERS BUILDING  
436 SEVENTH AVENUE

PIITSBURGH, PA 15219  
(412) 434-7955  
WWR#02663143

**FILED**

*M. 1:40 PM 10/04/02*

DEC 04 2002

William A. Shaw  
Prothonotary

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

NO.: 02-1250-CD

Plaintiff,

vs.

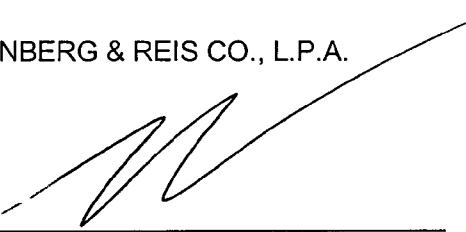
UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendants.

PRAECIPE TO REINSTATE COMPLAINT

Kindly reinstate the Complaint in the above-captioned matter.

WELTMAN, WEINBERG & REIS CO., L.P.A.



Kimberly J. Hong, Esquire  
Pa. I.D. #74950  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff No. 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

PRAECIPE FOR DEFAULT JUDGMENT  
(IN REM)

Defendant

FILED

JAN 09 2003

I HEREBY CERTIFY THE ADDRESS OF PLAINTIFF IS:

P.O. Box 2060  
Alliance, OH 44601

William A. Shaw  
Notary

Kimberly J. Hong, Esquire  
PA I.D. NO. 74950

AND THE DEFENDANT IS:

RD 1, Box 494  
Morrisdale, PA 16858

Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

WELTMAN, WEINBERG & REIS CO., L.P.A.

BY:   
ATTORNEYS FOR PLAINTIFF

WWR#02663143

THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND ANY  
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff

No. 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

**PRAECIPE FOR DEFAULT JUDGMENT (IN REM)**

TO THE PROTHONOTARY:

Kindly enter Judgment against the Defendant, Unknown Heirs, Successors, Assigns, and all persons, firms, or associations claiming right, title, and interest from or under Samuel K. Dixon, deceased, above named, in the default of an Answer, in the amount of \$16,129.17 computed as follows:

Principal	\$ 12,619.98
Interest thru 11/12/02	
at the legal interest rate of \$4.49 per diem	\$ 1,373.68
Late Charges thru 11/12/02	\$ 54.99
Escrow thru 11/12/02	\$ 1,030.52
Execution Costs thru 11/12/02	\$ 0.00
Attorneys fees thru 11/12/02	\$ 1,000.00
Title Search	\$ 50.00
<b>TOTAL</b>	<b>\$ 16,129.17</b>

I hereby certify that appropriate Notices of Default, as attached have been mailed in accordance with PA R.C.P. 237.1 on the dates indicated on the Notices.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: \_\_\_\_\_

Kimberly J. Hong  
Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

**AFFIDAVIT OF NON-MILITARY SERVICE**

The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, that the parties against whom Judgment is to be entered according to the Praeclipe attached are not members of the Armed Forces of the United States or any other military or non-military service covered by the Soldiers and Sailors Civil Relief Act of 1940. The undersigned further states that the information is true and correct to the best of the undersigned's knowledge and belief and upon information received from others.

WELTMAN, WEINBERG & REIS CO., L.P.A.



By: \_\_\_\_\_  
Kimberly J. Hong  
Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff

vs.

Civil Action No. 02-1250-CD

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

**IMPORTANT NOTICE**

TO: UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE AND INTEREST  
FROM OR UNDER Samuel K. Dixon, deceased  
RD1 Box 494  
Morrisdale, PA 16858

Date of Notice: 10/30/02

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

PA Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: \_\_\_\_\_  
Kimberly J. Hong  
Weltman, Weinberg & Reis co. L.P.A.  
2718Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

FILED

Atty pd.

31259 Bk

20.00

JAN 09 2003

Notice to Def.

William A. Shaw Statement to Atty  
Prothonotary  
No CC

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff

No. 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

NOTICE OF JUDGMENT OR ORDER

TO: Unknown Heirs, Successors, Assigns, and  
all persons, firms, or associations claiming  
right, title and interest from or under  
Samuel K. Dixon, deceased  
RD1, Box 494  
Morrisdale, PA 16858

( ) Plaintiff  
(xx) Defendant  
( ) Garnishee

You are hereby notified that the following  
Order or Judgment was entered against you  
on \_\_\_\_\_

( ) Assumpsit Judgment in the amount of \$\_\_\_\_\_ plus costs.  
(XX) Mortgage Foreclosure in the amount of \$16,129.17 plus costs.  
( ) Trespass Judgment in the amount of \$\_\_\_\_\_ plus costs.  
( ) If not satisfied within sixty (60) days, your motor vehicle operator's  
license and/or registration will be suspended by the Department of  
Transportation, Bureau of Traffic Safety, Harrisburg, PA.  
(xx) Entry of Judgment of  
( ) Court Order  
( ) Non-Pros  
( ) Confession  
(xx) Default  
( ) Verdict  
( ) Arbitration Award

Prothonotary

By:

PROTHONOTARY (OR DEPUTY)

THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND ANY  
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

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

C&G Savings Bank  
Plaintiff(s)

No.: 2002-01250-CD

Real Debt: \$16,129.17

Atty's Comm:

Vs.

Costs: \$

Int. From:

Unknown Heirs, successors, assigns, and all  
persons, firms, or associations claiming right,  
title, and interest from or under Samuel K.  
Dixon, deceased  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: January 9, 2003

Expires: January 9, 2008

Certified from the record this 9th day of January, 2003.

---

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

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff

vs.

Civil Action No. 02-1250-CD

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

TYPE OF PLEADING:

PROOF OF SERVICE

Filed on Behalf of:

Plaintiff

Counsel or Record for this Party:

Kimberly J. Hong  
PA I.D. #74950

Weltman, Weinberg & Reis Co., L.P.A.  
27181 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
WWR #02663143

FILED

JAN 08 2003

William A. Shaw  
Prothonotary

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,  
Plaintiff

vs.

Civil Action No. 02-1250-CD

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

PROOF OF SERVICE

BEFORE ME, the undersigned authority, personally appeared Kimberly J. Hong, Esquire, who according to law deposes and says that a copy of the Complaint in Mortgage Foreclosure has been served on the Defendant, UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE AND INTEREST FROM OR UNDER Samuel K. Dixon, deceased.

1. On or about August 30, 2001, Plaintiff received a signed Order of Court permitting service, on the Defendant, to be complete and valid upon posting of the property and mailing the complaint to the last known address. Said Order of Court is attached as Exhibit "A".

2. On or about September 25, 2002, Plaintiff published a copy of the Notice in Courier Express. Said Proof of Publication is attached as Exhibit "B".

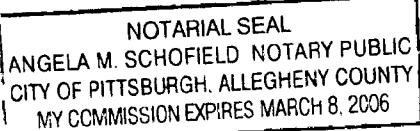
3. On or about September 27, 2002, Plaintiff published a copy of the Notice in the Clearfield County Legal Journal. Said Proof of Publication is attached as Exhibit "C".

4. On or about October 5, 2002, Constable Louis P. Radzyminski posted the property with a copy of the complaint in mortgage foreclosure. Said returns are marked as Exhibit "D".

WELTMAN, WEINBERG & REIS, CO., L.P.A.

Kimberly J. Hong  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219

Sworn to and subscribed before me  
This 6th day of January, 2003  
Angela M. Schofield  
Notary Public



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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,  
v.

NO: 02-1250-CJ

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

ORDER OF COURT

AND NOW, to wit, this 30<sup>th</sup> day of August, 2001, upon consideration  
of the within Motion for Special Service of the Complaint in Mortgage Foreclosure Pursuant to  
Special Order of Court, it is hereby ORDERED, ADJUDGED and DECREED that the Plaintiff is  
permitted to serve Defendant, Unknown Heirs, Successors, Assigns, and all persons, firms, or  
associations claiming right title and interest from or under Samuel K. Dixon, deceased, by  
directing the Sheriff of Clearfield County to post the property at RD1, Box 494, Morrisdale, PA  
16858, and by publication pursuant to Pa. R.C.P. Rule 430 (b) (2) in one legal journal and one  
newspaper of general circulation. Service of the Complaint shall be deemed complete and valid  
upon mailing and publication by the Plaintiff and by posting by the Sheriff.

BY THE COURT:

/s/ JOHN K. REILLY, JR.

J.

be a true  
copy of the original  
document.

AUG 30 2002

EXHIBIT

A

Attest:

W. J. Reilly  
Prothonotary

**PROOF OF PUBLICATION OF NOTICE APPEARING IN THE  
001 PRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT  
'UBLISHED BY McLEAN PUBLISHING COMPANY,  
DUBOIS PENNSYLVANIA**

Legals

IN THE COURT OF COMMON  
PLEAS OF CLEARFIELD COUN-  
TY, PENNSYLVANIA  
CIVIL DIVISION

S C&G SAVINGS BANK, assignee  
of FAMILY MOBILE HOMES,  
INC., Plaintiff

'LVANIA  
RFIELD

SS:

Li vs.

E UNKNOWN HEIRS,  
SV SUCCESSORS, ASSIGNS, AND  
W ALL PERSONS, FIRMS OR  
ASSOCIATIONS CLAIMING  
RIGHT, TITLE AND INTEREST  
FROM OR UNDER SAMUEL K.  
re DIXON, deceased,  
ex. Defendants  
da Case No.: 02-1250-CD

ing Director or Dory Ferra, Classified Advertising Supervisor of the **Courier-Sunday/Jeffersonian Democrat** of the County and State aforesaid, being duly  
ays that the **Courier-Express**, a daily newspaper, the **Tri-County Sunday**, a  
**Jeffersonian Democrat**, a weekly newspaper published by McLean Publishing  
ers Street, City of DuBois, County and State aforesaid, which was established in  
which date said, the daily publication and the weekly publications, has been  
County, and that a copy of the printed notice of publication is attached hereto  
as printed and published in the regular editions of the paper on the following

NOTICE

Af If you wish to defend, you must  
ne enter a written appearance  
ne personally or by attorney and file  
int your defenses or objections in  
for writing with the court. You are  
warned that if you fail to do so the  
case may proceed without you  
and a judgment may be entered  
against you without further notice  
for the relief requested by the  
plaintiff. You may lose money or  
property or other rights important  
to you.

es that he is an officer duly authorized by the **Courier-Express**, a daily  
**Sunday**, a weekly newspaper, and/or **Jeffersonian Democrat**, a weekly  
e foregoing statement under oath and also declared that affiant is not  
t matter of the aforesaid notice of publication, and that all allegations in the  
to time, place and character of publication are true.

**McLEAN PUBLISHING COMPANY Publisher of  
EXPRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT**

*Linda Smith*

YOU SHOULD TAKE THIS  
NOTICE 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.

PA Bar Association  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375  
9/25/02

*Robin M. Duttry*  
Notary Public  
Statement of Advertising Cost

**McLEAN PUBLISHING COMPANY**

Publisher of

**COURIER-EXPRESS/TRI-COUNTY SUNDAY/  
JEFFERSONIAN DEMOCRAT**  
DuBois, PA

NOTARIAL SEAL  
ROBIN M. DUTTRY, NOTARY PUBLIC  
CITY OF DUBOIS, CLEARFIELD COUNTY  
MY COMMISSION EXPIRES APRIL 16, 2006

TO Weltman, Weinberg & Reis  
For publishing the notice or advertisement  
attached hereto on the above stated dates.....\$ 73.98  
Probating same.....\$ 4.25  
Total.....\$ 78.23

**Publisher's Receipt for Advertising Costs**

The **Courier-Express**, a daily newspaper, **Tri-County Sunday**, a weekly newspaper, and/or  
**Jeffersonian Democrat**, a weekly newspaper, hereby acknowledges receipt of the aforesaid  
advertising and publication costs, and certifies that the same have been fully paid.

Office: Jeffers Street and Beaver Drive, DuBois, PA 15801  
Established 1879, Phone 814-371-4200

**McLEAN PUBLISHING COMPANY**  
Publisher of

**COURIER-EXPRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT**

By \_\_\_\_\_

I hereby certify that the foregoing is the original Proof of Publication and receipt for the  
Advertising costs in the subject matter of said notice.

**EXHIBIT**

**ATTORNEY FOR**

**B**

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

C & G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC., Plaintiff  
vs. UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE AND INTEREST FROM OR  
UNDER SAMUEL K. DIXON, deceased,  
Defendants.

NOTICE

If you wish to defend, you must enter a written appearance personally or by attorney and file your defenses or objections in writing with the court. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you without further notice for the relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS NOTICE 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.

PA Bar Association, P.O. Box 186, Harrisburg, PA 17108, 800-692-7375.

WELTMAN, WEINBERG & REIS, CO., L.P.A., 2718 Koppers Building, 436 Seventh Avenue, Pittsburgh, PA 15219.

## PROOF OF PUBLICATION

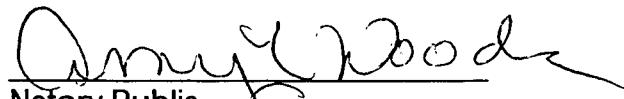
SYLVANIA :  
: :  
: :  
ARFIELD :

day of September AD 2002, before me, the subscriber, a and for said County and State, personally appeared Gary A. of the Clearfield County Legal Journal of the Courts of and that the annexed is a true copy of the notice or lished in said publication in the regular issues of Week of 02 Vol. 14 No. 39. And that all of the allegations of this e time, place, and character of the publication are true.

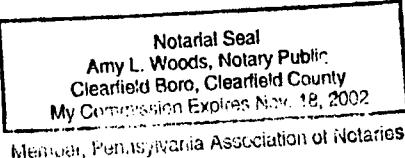


Gary A. Knaresboro, Esquire  
Editor

Sworn and subscribed to before me the day and year aforesaid.

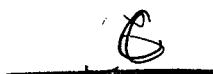


Notary Public  
My Commission Expires



Weltman, Weinberg & Reis, Co.  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh PA 15219

EXHIBIT



02463143

RETURN OF SERVICE

WWR# 02663143

Property Posted:

Samuel Dixon

Date of Posting:

10-5-02

Defendant Property Posted for: UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE AND INTEREST FROM OR UNDER Samuel Dixon, deceased.

Case No: 02-1250-CD

Constable: Louis F. Rodzymski

Date: 12:30 PM 10-5-02

**EXHIBIT**

D

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff, NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

TYPE OF PLEADING:

PRAECIPE FOR WRIT OF EXECUTION

Filed on Behalf of:

PLAINTIFF

Counsel or Record for this Party:

Kimberly J. Hong  
PA I.D. #74950

JAN 21 2003

William A. Shaw  
Prothonotary

Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
WWR #02615844

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

**PRAECIPE FOR WRIT OF EXECUTION**

TO THE PROTHONOTARY:

Kindly issue a Writ of Execution in the above matter, directed to the Sheriff of Clearfield  
County against Defendant, Unknown Heirs, Successors, Assigns and all persons, Firms or Associations  
claiming Right, Title and Interest from or under Samuel K. Dixon, deceased, or for the amount of:

1. Judgment Amount	\$ 16,129.17
Interest at the rate of \$ 4.49 per diem from	
1/9/03 thru sale date	\$ 808.20
2. Late Charges thru sale date	\$ <u>112.74</u>
<b>TOTAL</b>	<b>\$ 17,050.11</b>

*Prothonotary Costs 134.00*

With continuing interest at the aforesaid rate plus appropriate additional attorney fees and costs.

Costs (to be added by Prothonotary)

\$

Date: 11/5/03



Kimberly J. Hong  
Attorney for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, Pennsylvania 15219

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff, NO: 02-1250 CD  
vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

AFFIDAVIT OF COMPLIANCE WITH ACT 6 OF 1974, 41 P.S. 101, ET. SEQ.  
AND ACT 91 OF 1983

COMMONWEALTH OF PENNSYLVANIA )  
 )  
 COUNTY OF ALLEGHENY ) SS:

Before me, the undersigned authority, a Notary Public in and for the said County and Commonwealth, personally appeared Kimberly J. Hong, Esquire, attorney for the Plaintiff, who being duly sworn according to law deposes and says that on or about April 19, 2002, Defendant was mailed Notice of Homeowner's Emergency Assistance Act of 1983, in compliance with the Homeowner's Emergency Assistance Act, Act 91 of 1983 Take Action to Save Your Home From Foreclosure pursuant to 12 PA Code Chapter 31, Subchapter B, Section 31.201 et. seq.

The foregoing statement is true and correct to the best of my knowledge, information and belief.

KIMBERLY J. HÖNG, ESQUIRE  
Weltman, Weinberg & Reis, Co., L.P.A.  
2718 Koppers Building, 436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

Sworn to and subscribed before me,

this 17<sup>th</sup> day of January, 2003.

John Simard  
NOTARY PUBLIC

NOTARIAL SEAL  
ANGELA M. SCHOFIELD, NOTARY PUBLIC  
CITY OF PITTSBURGH, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES MARCH 9, 2006

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

**Plaintiff,**

NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

**AFFIDAVIT OF LAST KNOWN ADDRESS**

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
COUNTY OF ALLEGHENY )

Before me, the undersigned authority, a Notary Public in and for the said County and Commonwealth, personally appeared Kimberly J. Hong, attorney for the Plaintiff, who being duly sworn according to law deposes and says that the owner of the property located at RD 1, Box 494, Morrisdale, PA 16858 is Defendant, Unknown Heirs, Successors, Assigns and all Persons, Firms or Associations claiming Right, Title and Interest from or under Samuel K. Dixon, deceased, who resides at RD 1, Box 494, Morrisdale, PA 16858, to the best of her information, knowledge and belief.

KIMBERLY J. HONG, ESQUIRE  
Weltman, Weinberg & Reis, Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

Sworn to and subscribed before me

this 17<sup>th</sup> day of January 2003.

Angela Springfield  
Notary Public

NOTARIAL SEAL  
ANGELA M. SCHOFIELD, NOTARY PUBLIC  
CITY OF PITTSBURGH, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES MARCH 8, 2003

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

LONG FORM DESCRIPTION

ALL that certain piece or parcel of land situated in the Township of Graham, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING at an iron pipe which is the common corner of George Ogden, Norman A. and Janice M. Parks and the property to be described for Grantee; thence along lands of Norman A. and Janice M. Parks, North eighty-eight degrees, forty-two minutes West (N 88° 42' W) one hundred sixty and thirty-nine hundredths feet (160.39) to an iron pipe, thence still along lands of Norman A. and Janice M. Parks, South no degrees, forty-eight minutes, fifteen seconds East (S 0° 48' 15" E) two hundred forty-three and twenty-seven hundredths feet (243.27) to an iron pipe and the Northeast corner of James J. Boron, thence along lands of James J. Boron, North eighty-nine degrees, eleven minutes, forty-five seconds West (N 89° 11' 45" W) six hundred fifty-five and fifty-three hundredths feet (655.53) to an iron pipe on line of Charles Chilcote; thence along lands of Charles Chilcote, North two degrees, twenty-one minutes, fifteen seconds East (N 2° 21' 15" E) five hundred forty-four and sixty-five hundredths feet (544.65) to an iron pipe and the Southwest corner of Ann Rothrock; thence along lands of Ann Rothrock, South eighty-eight degrees, fifty-five minutes, thirty-five seconds East (S 88° 55' 35" E) seven hundred seventy-three and ninety-three hundredths feet (773.93) to an iron pipe and the Northwest corner of George Ogden, thence along lands of George Ogden, South four degrees, twenty-four minutes East (S 4° 24' E) three hundred feet (300.0) to an iron pipe and place of beginning.

CONTAINING 9.08 acres and being part of the same premises that were conveyed to Samuel and Marion Dixon and recorded in Clearfield County in deed book 404, page 310. The said Marion Dixon having predeceased her husband, the hereinabove described premises became vested in Samuel Dixon as surviving tenant by the entireties. The said Samuel Dixon HAVING DIED ON February 1, 1987, and by his Last Will and Testament, dated January 26, 1984, and duly entered by probate in the Office of the Register of Wills of Clearfield County, Pennsylvania, in file No. 87-49, at Will Book Volume 56, page 480, did give, devise and bequeath his real estate, including the herein described premises to Samuel K. Dixon and Janice M. Parks, the Grantors Herein.

Excepting and reserving all exceptions and reservations as contained in prior deeds.

BEING the same premises which Samuel K. Dixon and Janice M. Parks, individually and as co-executors of the Estate of Samuel K. Dixon, deceased, by Deed dated October 2, 1987 and recorded in Clearfield County on October 30, 1987 at Deed Book 1190 Page 433 granted and conveyed to Samuel K. Dixon.

WELTMAN, WEINBERG & REIS, CO., L.P.A.

---

Kimberly J. Hong, Esquire  
Attorney for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, Pennsylvania 15219

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

NOTICE OF SHERIFF'S SALE OF REAL ESTATE

TO: Unknown Heirs, Successors, Assigns and all Persons, Firms  
or Associations claiming Right, Title and Interest from or  
under Samuel K. Dixon, deceased,  
RD 1, Box 494,  
Morrisdale, PA 16858

TAKE NOTICE that by virtue of the above Writ of Execution issued out of the Court of Common  
Pleas of Clearfield County, Pennsylvania, and the Sheriff of Clearfield County, directed, there will be  
exposed to Public Sale in the

Clearfield County Courthouse  
One North Second Street, Suite 116  
Clearfield, PA 16830

on , at A.M., the following described real estate, of which Samuel K.  
Dixon is the owner or reputed owner:

ALL THE RIGHT, TITLE, INTEREST AND CLAIM OF SAMUEL K. DIXON, DECEASED OF, IN  
AND TO:

ALL THE FOLLOWING DESCRIBED REAL ESTATE SITUATED IN THE TOWNSHIP OF  
GRAHAM, COUNTY OF CLEARFIELD, COMMONWEALTH OF PENNSYLVANIA. HAVING  
ERECTED THEREON A DWELLING KNOWN AND NUMBERED AS RD 1 BOX 494,  
MORRISDALE, PA 16858. DEED BOOK 1190 PAGE 433, PARCEL NUMBER 116-P9-11.

The said Writ of Execution has been issued on a judgment in the mortgage foreclosure action of  
**C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,**

Plaintiff,  
vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

at Execution Number 02-1250 CD in the amount of \$17,050.11, with appropriate continuing interest, attorneys fees, and costs as set forth in the Praeclipe for Writ of Execution.

Claims against the property must be filed with the Sheriff before the above sale date.

Claims to proceeds must be made with the Office of the Sheriff before distribution.

Schedule of Distribution will be filed with the Office of the Sheriff no later than thirty (30) days from sale date.

Exceptions to Distribution or a Petition to Set Aside the Sale must be filed with the Office of the Sheriff no later than ten (10) days from the date when Schedule of Distribution is filed in the Office of the Sheriff.

The Writ of Execution has been issued because there is a judgment against you. It may cause your property to be held or taken to pay the judgment. You may have legal rights to prevent your property from being taken. A lawyer can advise you more specifically of these rights. If you wish to exercise your rights, you must act promptly.

YOU SHOULD TAKE THIS NOTICE AND THE WRIT OF EXECUTION 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 ADVICE.

David S. Meholick, Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
(814) 765-2641 ext. 5982

You may have legal rights to prevent the Sheriff's Sale and the loss of your property. In order to exercise those rights, prompt action on your part is necessary.

You may have the right to prevent or delay the Sheriff's Sale by filing, before the sale occurs, a petition to open or strike the judgment or a petition to stay the execution.

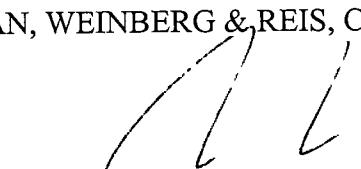
If the judgment was entered because you did not file with the Court any defense or objection within twenty (20) days after service of the Complaint for Mortgage Foreclosure and Notice to Defend, you may have the right to have the judgment opened if you promptly file a petition with the court alleging a valid defense and a reasonable excuse for failing to file the defense on time. If the judgment is opened, the Sheriff's Sale would ordinarily be delayed pending a trial of the issue of whether the Plaintiff has a valid claim to foreclose the mortgage or judgment.

You may also have the right to have the judgment stricken if the Sheriff has not made a valid return of service of the Complaint and Notice to Defend or if the judgment was entered before twenty (20) days after service or in certain other events. To exercise this right you would have to file a petition to strike the judgment.

You may also have the right to petition the Court to stay or delay the execution and the Sheriff's Sale if you can show a defect in the Writ of Execution of service or demonstrate any other legal or equitable right.

YOU MAY ALSO HAVE THE RIGHT TO HAVE THE SHERIFF'S SALE SET ASIDE IF THE PROPERTY IS SOLD FOR A GROSSLY INADEQUATE PRICE OR, IF THERE ARE DEFECTS IN THE SHERIFF'S SALE. TO EXERCISE THIS RIGHT, YOU SHOULD FILE A PETITION WITH THE COURT AFTER THE SALE AND BEFORE THE SHERIFF HAS DELIVERED HIS DEED TO THE PROPERTY. THE SHERIFF WILL DELIVER THE DEED IF NO PETITION TO SET ASIDE THE SALE IS FILED WITHIN TEN (10) DAYS FROM THE DATE WHEN THE SCHEDULE OF DISTRIBUTION IS FILED IN THE OFFICE OF THE SHERIFF.

WELTMAN, WEINBERG & REIS, CO., L.P.A.



---

Kimberly J. Hong, Esquire  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, Pennsylvania 15219

**THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.**

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff, NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

AFFIDAVIT PURSUANT TO RULE 3129.1

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
COUNTY OF ALLEGHENY )

C&G SAVINGS BANK, et. al., Plaintiff in the above action, sets forth as of the date of the Praeclipe for the Writ of Execution was filed the following information concerning the real property of Samuel K. Dixon, deceased, located at RD 1, Box 494, Morrisdale, PA 16858 and is more fully described as follows:

ALL THE RIGHT, TITLE, INTEREST AND CLAIM OF SAMUEL K. DIXON, DECEASED OF, IN AND TO:

ALL THE FOLLOWING DESCRIBED REAL ESTATE SITUATED IN THE TOWNSHIP OF GRAHAM, COUNTY OF CLEARFIELD, COMMONWEALTH OF PENNSYLVANIA. HAVING ERECTED THEREON A DWELLING KNOWN AND NUMBERED AS RD 1 BOX 494, MORRISDALE, PA 16858. DEED BOOK 1190 PAGE 433, PARCEL NUMBER 116-P9-11.

1. The name and address of the owners or reputed owners:

Unknown Heirs, Successors, Assigns and all Persons,  
Firms or Associations claiming Right, Title and Interest  
from or under Samuel K. Dixon, deceased,

RD 1, Box 494,  
Morrisdale, PA 16858

2. The name and address of the Defendants in the judgment:

Unknown Heirs, Successors, Assigns and all Persons,  
Firms or Associations claiming Right, Title and Interest  
from or under Samuel K. Dixon, deceased,

RD 1, Box 494,  
Morrisdale, PA 16858

3. The name and last known address of every judgment creditor whose judgment is a record lien on the real property to be sold:

C&G SAVINGS BANK, et.al. (Plaintiff)

Tax Claim Bureau 230 E. Market Street  
Clearfield, PA 16830

Mid-State Bank and Trust 130 12<sup>th</sup> Ave.  
Altoona, PA 16601

Keystone Credit PO Box 686  
Lock Haven, PA 17745

4. The name and address of the last record holder of every mortgage of record:

C&G SAVINGS BANK, et.al.. (Plaintiff)

5. The name and address of every other person who has any record lien on the property:

NONE

6. The name and address of every other person who has any record interest in the property and whose interest may be affected by the sale:

NONE

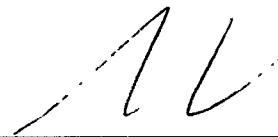
7. The name and address of every other person whom the Plaintiff has knowledge who has any interest in the property which may be affected by the sale:

Inheritance Tax Bureau 230 E. Market Street  
Clearfield, PA 16830

Domestic Relations 230 E. Market Street  
Clearfield, PA 16830

The information provided in the foregoing Affidavit is provided solely to comply with the Pennsylvania Rules of Civil Procedure 3129.1 and it is not intended to be a comprehensive abstract of the condition of the title of the real estate which is being sold under this execution. No person or entity is entitled to rely on any statements made herein in regard to the condition of the title of the property or to rely on any statement herein in formulating bids which might be made at the sale of the property.

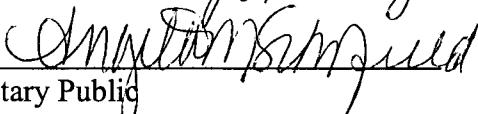
I verify that the statements made in the Affidavit are true and correct to the best of my personal knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.



Kimberly J. Hong, Esquire  
Attorneys for Plaintiff

Sworn to and subscribed before me

this 17<sup>th</sup> day of January, 2003.

  
Notary Public

NOTARIAL SEAL

ANGELA M. SCHOFIELD, NOTARY PUBLIC  
CITY OF PITTSBURGH, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES MARCH 8, 2016

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

**Plaintiff,**

NO: 02-1250 CD

VS.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

AFFIDAVIT PURSUANT TO RULE 3129.1

COMMONWEALTH OF PENNSYLVANIA )  
 )  
COUNTY OF ALLEGHENY ) SS:

C&G SAVINGS BANK, et. al., Plaintiff in the above action, sets forth as of the date of the Praeipe for the Writ of Execution was filed the following information concerning the real property of Samuel K. Dixon, deceased, located at RD 1, Box 494, Morrisdale, PA 16858 and is more fully described as follows:

ALL THE RIGHT, TITLE, INTEREST AND CLAIM OF SAMUEL K. DIXON, DECEASED OF, IN  
AND TO:

ALL THE FOLLOWING DESCRIBED REAL ESTATE SITUATED IN THE TOWNSHIP OF GRAHAM, COUNTY OF CLEARFIELD, COMMONWEALTH OF PENNSYLVANIA. HAVING ERECTED THEREON A DWELLING KNOWN AND NUMBERED AS RD. 4 BOX 494, MORRISDALE, PA 16858. DEED BOOK 1190 PAGE 433, PARCEL NUMBER 116-P9-11.

1. The name and address of the owners or reputed owners:

Unknown Heirs, Successors, Assigns and all Persons,  
Firms or Associations claiming Right, Title and Interest  
from or under Samuel K. Dixon, deceased,

RD 1, Box 494,  
Morrisdale, PA 16858

2. The name and address of the Defendants in the judgment:

Unknown Heirs, Successors, Assigns and all Persons,  
Firms or Associations claiming Right, Title and Interest  
from or under Samuel K. Dixon, deceased,

RD 1, Box 494,  
Morrisdale, PA 16858

3. The name and last known address of every judgment creditor whose judgment is a record lien on  
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C&G SAVINGS BANK, et.al.

(Plaintiff)

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230 E. Market Street  
Clearfield, PA 16830

Mid-State Bank and Trust

130 12<sup>th</sup> Ave.  
Altoona, PA 16601

Keystone Credit

PO Box 686  
Lock Haven, PA 17745

4. The name and address of the last record holder of every mortgage of record:

C&G SAVINGS BANK, et.al..

(Plaintiff)

5. The name and address of every other person who has any record lien on the property:

NONE

6. The name and address of every other person who has any record interest in the property and whose  
interest may be affected by the sale:

NONE

7. The name and address of every other person whom the Plaintiff has knowledge who has any  
interest in the property which may be affected by the sale:

Inheritance Tax Bureau

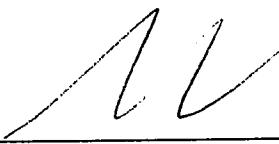
230 E. Market Street  
Clearfield, PA 16830

Domestic Relations

230 E. Market Street  
Clearfield, PA 16830

The information provided in the foregoing Affidavit is provided solely to comply with the Pennsylvania Rules of Civil Procedure 3129.1 and it is not intended to be a comprehensive abstract of the condition of the title of the real estate which is being sold under this execution. No person or entity is entitled to rely on any statements made herein in regard to the condition of the title of the property or to rely on any statement herein in formulating bids which might be made at the sale of the property.

I verify that the statements made in the Affidavit are true and correct to the best of my personal knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

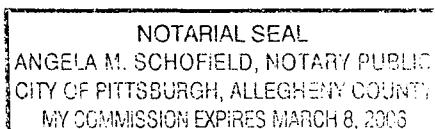


Kimberly J. Hong, Esquire  
Attorneys for Plaintiff

Sworn to and subscribed before me

this 17th day of January, 2003.

Angela M. Schofield  
Notary Public



**WRIT OF EXECUTION and/or ATTACHMENT  
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD  
CIVIL ACTION – LAW**

C&G Savings Bank, assignee of  
Family Mobile Homes, Inc.

Vs.

NO.: 2002-01250-CD

Unknown Heirs, Successors, Assigns,  
and all other Persons, Firms or Associations  
claiming right, title and interest from or under  
Samuel K. Dixon, deceased

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the debt, interest and costs due C&G SAVINGS BANK, assignee of FAMILY MOBILE HOMES, INC., Plaintiff(s) from Unknown heirs, successors, assigns, and all persons, firms or associations claiming right, title and interest from or under SAMUEL K. DIXON, deceased Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:  
See Attached
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:

Garnishee(s) as follows:

and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;

- (3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE: \$16,129.17  
INTEREST at the rate of \$4.49 per diem from  
1/9/03 thru sale date: \$808.20  
PROTH. COSTS: \$  
ATTY'S COMM: \$  
DATE: 01/31/2003

PAID: \$134.00  
SHERIFF: \$  
LATE CHARGES thru sale date: \$112.74  
OTHER COSTS: \$

Received this writ this \_\_\_\_\_ day  
of \_\_\_\_\_ A.D. \_\_\_\_\_  
At \_\_\_\_\_ A.M./P.M.

Sheriff

---

William A. Shaw  
Prothonotary/Clerk Civil Division

Requesting Party: Kimberly J. Hong  
2718 Koppers Building  
436 Seventh Ave.  
Pittsburgh, PA 15219

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

LONG FORM DESCRIPTION

ALL that certain piece or parcel of land situated in the Township of Graham, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING at an iron pipe which is the common corner of George Ogden, Norman A. and Janice M. Parks and the property to be described for Grantee; thence along lands of Norman A. and Janice M. Parks, North eighty-eight degrees, forty-two minutes West (N 88° 42' W) one hundred sixty and thirty-nine hundredths feet (160.39) to an iron pipe, thence still along lands of Norman A. and Janice M. Parks, South no degrees, forty-eight minutes, fifteen seconds East (S 0° 48' 15" E) two hundred forty-three and twenty-seven hundredths feet (243.27) to an iron pipe and the Northeast corner of James J. Boron, thence along lands of James J. Boron, North eighty-nine degrees, eleven minutes, forty-five seconds West (N 89° 11' 45" W) six hundred fifty-five and fifty-three hundredths feet (655.53) to an iron pipe on line of Charles Chilcote; thence along lands of Charles Chilcote, North two degrees, twenty-one minutes, fifteen seconds East (N 2° 21' 15" E) five hundred forty-four and sixty-five hundredths feet (544.65) to an iron pipe and the Southwest corner of Ann Rothrock; thence along lands of Ann Rothrock, South eighty-eight degrees, fifty-five minutes, thirty-five seconds East (S 88° 55' 35" E) seven hundred seventy-three and ninety-three hundredths feet (773.93) to an iron pipe and the Northwest corner of George Ogden, thence along lands of George Ogden, South four degrees, twenty-four minutes East (S 4° 24' E) three hundred feet (300.0) to an iron pipe and place of beginning.

CONTAINING 9.08 acres and being part of the same premises that were conveyed to Samuel and Marion Dixon and recorded in Clearfield County in deed book 404, page 310. The said Marion Dixon having predeceased her husband, the hereinabove described premises became vested in Samuel Dixon as surviving tenant by the entireties. The said Samuel Dixon HAVING DIED ON February 1, 1987, and by his Last Will and Testament, dated January 26, 1984, and duly entered by probate in the Office of the Register of Wills of Clearfield County, Pennsylvania, in file No. 87-49, at Will Book Volume 56, page 480, did give, devise and bequeath his real estate, including the herein described premises to Samuel K. Dixon and Janice M. Parks, the Grantors Herein.

Excepting and reserving all exceptions and reservations as contained in prior deeds.

BEING the same premises which Samuel K. Dixon and Janice M. Parks, individually and as co-executors of the Estate of Samuel K. Dixon, deceased, by Deed dated October 2, 1987 and recorded in Clearfield County on October 30, 1987 at Deed Book 1190 Page 433 granted and conveyed to Samuel K. Dixon.

WELTMAN, WEINBERG & REIS, CO., L.P.A.

---

Kimberly J. Hong, Esquire  
Attorney for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, Pennsylvania 15219

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13041

C&G SAVINGS BANK

02-1250-CD

VS.

DIXON, SAMUEL K.. Deceased (unknown heirs al)

COMPLAINT IN MORTGAGE FORECLOSURE

**SHERIFF RETURNS**

---

NOW JANUARY 10, 2002 RETURN THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED".

---

Return Costs

Cost      Description

14.74 SHFF. HAWKINS PAID BY: *alt*

10.00 SURCHARGE PAID BY: *alt*

Sworn to Before Me This

10 Day Of April 2003  
William Shaw

So Answers,

*Chester A. Hawkins*  
by *Marilyn Fann*

Chester A. Hawkins  
Sheriff

**FILED**

APR 10 2003

William A. Shaw  
Prothonotary

*8-4-02* Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

*Will A. Shaw*  
Deputy Prothonotary

*9-12-02* Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

*Will A. Shaw*  
Deputy Prothonotary

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

Plaintiff,

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

TO: DEFENDANT:

YOU ARE HEREBY NOTIFIED TO PLEAD TO THE  
ENCLOSED COMPLAINT WITHIN TWENTY (20) DAYS  
FROM SERVICE HEREOF OR A DEFAULT JUDGMENT  
MAY BE ENTERED AGAINST YOU.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By:

*Will A. Shaw*  
ATTORNEYS FOR PLAINTIFF

I HEREBY CERTIFY THE ADDRESS OF PLAINTIFF IS:  
P.O. Box 2060  
Alliance, OH 44601

AND THE DEFENDANT ARE:

RD 1, Box 494  
Morrisdale, PA 16858

WELTMAN, WEINBERG & REIS CO., L.P.A.

BY:

*Will A. Shaw*  
ATTORNEYS FOR PLAINTIFF

I HEREBY CERTIFY THAT THE LOCATION OF THE REAL  
ESTATE AFFECTED BY THIS LIEN IS:  
RD 1, Box 494  
Morrisdale, PA 16858  
Twp of Graham  
WELTMAN, WEINBERG & REIS CO., L.P.A.

BY:

*Will A. Shaw*  
ATTORNEYS FOR PLAINTIFF

NO. 02-1250 CO

ISSUE NO.:

CODE:

TYPE OF PLEADING:

COMPLAINT IN MORTGAGE  
FORECLOSURE

FILED ON BEHALF OF:  
PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

Kimberly J. Hong, ESQUIRE  
Pa. I.D. #74950

WELTMAN, WEINBERG & REIS CO., L.P.A.  
Firm #339  
2718 KOPPERS BUILDING  
436 SEVENTH AVENUE  
PITTSBURGH, PA 15219  
(412) 434-7955  
WWR#02663143

**FILED**

AUG 12 2002

William A. Shaw  
Prothonotary

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

C&G SAVINGS BANK, assignee of  
S/I/I/T FAMILY MOBILE HOMES, INC.,

Plaintiff,

v.

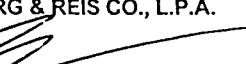
UNKNOWN HEIRS, SUCCESSORS,  
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FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

TO: DEFENDANT:

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FROM SERVICE HEREOF OR A DEFAULT JUDGMENT  
MAY BE ENTERED AGAINST YOU.

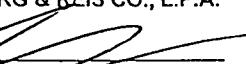
WELTMAN, WEINBERG & REIS CO., L.P.A.

By:   
ATTORNEYS FOR PLAINTIFF

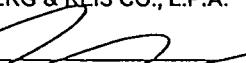
I HEREBY CERTIFY THE ADDRESS OF PLAINTIFF IS:  
P.O. Box 2060  
Alliance, OH 44601

AND THE DEFENDANT ARE:  
RD 1, Box 494  
Morrisdale, PA 16858

WELTMAN, WEINBERG & REIS CO., L.P.A.

BY:   
ATTORNEYS FOR PLAINTIFF

I HEREBY CERTIFY THAT THE LOCATION OF THE REAL  
ESTATE AFFECTION BY THIS LIEN IS:  
RD 1, Box 494  
Morrisdale, PA 16858  
Twp of Graham  
WELTMAN, WEINBERG & REIS CO., L.P.A.

BY:   
ATTORNEYS FOR PLAINTIFF

NO. 02-1250-CO

ISSUE NO.:

CODE:

TYPE OF PLEADING:

COMPLAINT IN MORTGAGE  
FORECLOSURE

FILED ON BEHALF OF:  
PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

Kimberly J. Hong, ESQUIRE  
Pa. I.D. #74950

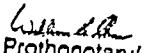
WELTMAN, WEINBERG & REIS CO., L.P.A.

Firm #339  
2718 KOPPERS BUILDING  
436 SEVENTH AVENUE  
PITTSBURGH, PA 15219  
(412) 434-7955  
WWR#02663143

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

AUG 12 2002

Attest.

  
Prothonotary/  
Clerk of Courts

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO:

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

**NOTICE TO DEFEND**

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:

PA Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375



COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
CIVIL DIVISION

INGS BANK, assignee of  
ILY MOBILE HOMES, INC.,

plaintiff,

IN HEIRS, SUCCESSORS,  
S, AND ALL PERSONS,  
OR ASSOCIATIONS  
G RIGHT, TITLE AND  
ST FROM OR UNDER  
K. DIXON, deceased,

defendant.

DANT:  
E HEREBY NOTIFIED TO PLEAD TO THE  
COMPLAINT WITHIN TWENTY (20) DAYS  
ERVICE HEREOF OR A DEFAULT JUDGMENT  
ENTERED AGAINST YOU.

I, WEINBERG & REIS CO., L.P.A.

NEYS FOR PLAINTIFF

CERTIFY THE ADDRESS OF PLAINTIFF IS:  
060  
H 44601

DEFENDANT ARE:  
494  
e, PA 16858

N, WEINBERG & REIS CO., L.P.A.

NEYS FOR PLAINTIFF

Y CERTIFY THAT THE LOCATION OF THE REAL  
AFFECTED BY THIS LIEN IS:  
x 494  
le, PA 16858  
Graham  
AN, WEINBERG & REIS CO., L.P.A.

NEYS FOR PLAINTIFF

NO. 06

ISSUE N

CODE:

TYPE O

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD  
CIVIL DIV

C&G SAVINGS BANK, assignee of  
s/i/l/t FAMILY MOBILE HOMES, INC.,

Plaintiff,

NC

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

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You have been sued in Court. If you wish to  
following pages, you must take action within twenty (20)  
served, by entering a written appearance personally or  
Court your defenses or objections to the claims set forth  
fail to do so the case may proceed without you and a judg-  
Court without further notice for any money claimed in the  
requested by the plaintiff. You may lose money or proper-

YOU SHOULD TAKE THIS PAPER TO YOUR  
HAVE A LAWYER OR CANNOT AFFORD ONE, GO  
FORTH BELOW TO FIND OUT WHERE YOU CAN GET

PA Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO:

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

NOTICE TO DEFEND

**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:**

PA Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

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

C&G SAVINGS BANK, s/i/i/t.  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO:

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

CIVIL ACTION - COMPLAINT IN MORTGAGE FORECLOSURE

And now, comes Plaintiff, C&G Savings Bank, s/i/i/t Family Mobile Homes, Inc., by and through its attorneys, WELTMAN, WEINBERG & REIS CO., L.P.A., and files this Complaint in Mortgage Foreclosure, averring in support thereof the following:

1. The Plaintiff is C&G Savings Bank, s/i/i/t Family Mobile Homes, Inc., a lending institution duly authorized to conduct business within the Commonwealth of Pennsylvania (hereinafter "Plaintiff").
2. The Defendant is Unknown Heirs, Successors, Assigns and all persons, firms, or associations claiming right, title and interest from or under Samuel K. Dixon, deceased, whose last known address is RD1, Box 494, Morrisdale, PA 16858.
3. On or about May 29, 1991, Samuel K. Dixon borrowed the sum of \$24,177.00 from Plaintiff pursuant to the terms of a written agreement, and as security for repayments thereof, Samuel K. Dixon made, executed and delivered to Plaintiff, a Mortgage in the original principal amount of \$24,177.00 on the premises hereinafter described, said Mortgage being recorded in the Office of the Recorder of Deeds of Clearfield County on June 5, 1991 in Mortgage Book Volume 1401, Page 43. A true and correct copy of said Mortgage containing a description of the premises subject to said Mortgage is marked Exhibit "A", attached hereto and made a part hereof.

4. Family Mobile Homes, Inc., assigned all of its right, title and interest in and to the Mortgage to Columbia Savings Association, pursuant to an Assignment of Mortgage, which was recorded on July 22, 2001, in Mortgage Book Volume 1409, Page 24.

5. Columbia Savings Association, assigned all of its right, title and interest in and to the Mortgage to C&G Savings Bank, pursuant to an Assignment of Mortgage

6. Plaintiff believes and therefore avers that Samuel K. Dixon is deceased.

7. Samuel K. Dixon was the current record and real owner of the aforesaid mortgaged premises at the time of his death.

8. The aforesaid Note and Mortgage are in default.

9. Demand for payment has been made upon the Defendant by Plaintiff, but Defendant was unable to pay the principal balance, interest or any other portion thereof to Plaintiff.

10. On or about April 19, 2002, Defendant was mailed Notice of Homeowner's Emergency Assistance Act of 1983, in compliance with the Homeowner's Emergency Assistance Act, Act 91 of 1983 and pursuant to 12 PA Code Chapter 31, Subchapter B, Section 31.201 et seq.

11. The amount due and owing Plaintiff is as follows:

Principal	\$ 12,619.98
Interest thru 7/18/02	\$ 816.53
Late Charge thru 7/18/02	\$ 0.00
Execution Costs thru 7/18/02	\$ 0.00
Attorneys' Fees thru 7/18/02	\$ 1,000.00
Other Charges	\$ 50.00
 TOTAL	 \$ 14,486.51

12. Contemporaneously hereunder, Defendant has been advised of the right to dispute the validity of this debt or any part thereof, pursuant to the Fair Debt Collection Practices Act 30 Day Notice, attached hereto marked Exhibit "C" and made a part hereof.

WHEREFORE, Plaintiff demands judgment in Mortgage Foreclosure for the amount due of \$14,486.51, with interest thereon at the rate of \$4.49 per diem from July 18, 2002, plus costs, in addition to late charges and for foreclosure and sale of mortgaged premises.

**THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED SHALL BE USED FOR THAT PURPOSE.**

WELTMAN, WEINBERG & REIS CO., L.P.A.

  
Kimberly J. Hong, Esquire  
Pa. I.D. #74950  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

VOL 1401 PAGE 013

## REAL ESTATE MORTGAGE

THIS MORTGAGE, made and entered into this 29th day of May 1991 by and between the undersigned, Samuel K. Dixon called "Mortgagor", and FAMILY MOBILE HOMES, INC., a Pennsylvania Association having an office and place of business at 1683 E. Pleasant Valley Blvd., Altoona, Pennsylvania 16602, herein called "Mortgagee".

WITNESSETH, that to secure payment by Mortgagor of a Promissory Note of even date herewith, in the total amount of fifty-five thousand thirty-three and 20/xx Buyer (\$ 33,033.20), principal sum of Twenty-four thousand one hundred seventy-seven and 00/xx Dollars (\$ 24,177.00), bearing interest at an annual rate of 17.99%, payable in 180 consecutive monthly installments, of three hundred seventy-five and 75/xx Dollars (\$ 375.74) each (and/or any renewals, refinancing or extension thereof, or other Promissory Note or other agreement to pay which may be substituted therefor, any or all of which are hereinafter referred to as "Promissory Note") and all other obligations of Mortgagor under the terms and provisions of this Mortgage, and obligations which Mortgagor may hereafter, from time to time become obligated to Mortgagee, for payment of, or for additional sums of money advanced by Mortgagee, and it is intended that all of said future advances, debts, or obligations, with interest thereon, will be secured hereby in addition to the advances, debts and obligations presently owing by Mortgagor. Mortgagor does by these presents sell, grant and convey to Mortgagee, ALL that real estate situated in the County of Clearfield (City, Borough, Township) of known and numbered as 100.

Braham Ward  
R.D. 1 Box 493 Morrisdale, Pa. 16858  
 Street Address City, Town, Post Office  
 Pennsylvania, and described in Deed recorded in the Recorder's Office of said County at Deed Book Volume 1190  
 Page A-33 and more particularly described as:  
 see attached Exhibit A

Assignment 1409/24 7/12/91

TOGETHER with all the buildings and improvements thereon and additions thereto, including all alleys, passageways, rights, liberties, privileges, hereditaments and appurtenances whatsoever thereunto belonging, or appurtenant, herein called the Mortgaged Premises.

TO HAVE AND TO HOLD the Mortgaged Premises hereby granted and conveyed unto Mortgagee, to and for the use and benefit of Mortgagee, its successors and assigns, forever.

THIS MORTGAGE IS MADE subject to the following conditions, and Mortgagor agrees:

1. Mortgagor will make all payments on the due date thereof and perform all other obligations as required or provided herein and in said Promissory Note. Mortgagee, at its option, may defer the payment date of all wholly unpaid installments one or more full months and charge a deferral charge therefor which shall be equal to the interest charge applicable to the month or months in which any installment is not required by reason of a deferral.
2. Mortgagor will pay when due all taxes and assessments levied or assessed against said premises or any part thereof, and will deliver receipt therefor to the Mortgagee upon request.
3. Mortgagor will keep the improvements on said property constantly insured against fire and such other hazards, in such amount and with such carriers as Mortgagee shall require, with loss if any payable to Mortgagee as its interest may accrue.
4. Mortgagor will neither commit nor suffer any strip, waste, impairment or deterioration of the mortgaged premises, and will maintain the same in good order and repair.
5. In the event that Mortgagor defaults in the making of any payment due and payable under said Combined Promissory Note and Federal Disclosure Statement, or in the keeping and performance by Mortgagor of any of the conditions or covenants of this Mortgage or said Combined Promissory Note and Federal Disclosure Statement, Mortgagee may forthwith bring an Action of Mortgage Foreclosure hereon, or institute other foreclosure proceedings upon this Mortgage, and may proceed to judgement and execution to recover the balance due on said Promissory Note and any other sums that may be due thereunder including reasonable attorney fees, costs of suit, and costs of sale together with interest after judgement at the applicable rate until the full amount due Mortgagee is paid. In the event Mortgagor fails to maintain insurance against fire and such other hazards as Mortgagee requires, Mortgagor authorizes Mortgagee at its option to obtain such insurance and bill Mortgagor for all costs thereof, which such costs Mortgagor agrees to pay, or to add such costs to the then remaining paid principal balance of Mortgagor's Promissory Note and charge interest thereon at the rate of interest contained in such Note.
6. Mortgagor agrees that this mortgage is security for the payment of the aforesaid obligations and all other direct or contingent liabilities of the Mortgagor hereto to the Mortgagee hereof due or to become due whether now existing or hereafter contracted.
7. If all or part of the sums secured by this Mortgage are lent to the Mortgagor to acquire title to the property, this Mortgage is hereby declared to be a Purchase Money Mortgage.
8. Mortgagor hereby waives and releases all benefits and relief from any and all appraisement, stay and exhibition laws, now in force or hereafter passed, either for the benefit or relief of Mortgagor, or limiting the balance due under said Promissory Note to a sum not in excess of the amount actually paid by the purchaser of the Mortgaged Premises at a sale thereof in

vol 1401 page 044

## Exhibit "A"

RECOMMENCING at an iron pipe which is the common corner of George Ogden, Norman A. and Janice M. Parks and the property to be described for Grantee; thence along lands of Norman A. and Janice M. Parks, North eighty-eight degrees, forty-two minutes West ( $W 88^{\circ} 42' W$ ) one hundred sixty and thirty-nine hundredths feet (160.39), to an iron pipe; thence still along lands of Norman A. and Janice M. Parks, South no degrees, forty-eight minutes, fifteen seconds East ( $S 0^{\circ} 48' 15'' E$ ) two hundred forty-three and twenty-seven hundredths feet (243.27) to an iron pipe and the Northwest corner of James J. Boron; thence along lands of James J. Boron, North eighty-nine degrees, eleven minutes, forty-five seconds West ( $W 89^{\circ} 11' 45'' W$ ) six hundred fifty-five and fifty-three hundredths feet (655.53) to an iron pipe on line of Charles Chilcote; thence along lands of Charles Chilcote, North two degrees, twenty-one minutes, fifteen seconds East ( $N 2^{\circ} 21' 15'' E$ ) five hundred forty-four and sixty-five hundredths feet (544.65) to an iron pipe and the Southwest corner of Ann Rothrock; thence along lands of Ann Rothrock, South eighty-eight degrees, fifty-five minutes, thirty-five seconds East ( $S 88^{\circ} 55' 35'' E$ ) seven hundred seventy-threes and ninety-three hundredths feet (773.93) to an iron pipe and the Northwest corner of George Ogden; thence along lands of George Ogden, South four degrees, twenty-four minutes East ( $S 0^{\circ} 24' E$ ) three hundred feet (300.0) to an iron pipe and place of beginning.

CONTAINING 9.08 acres and being part of the same premises that were conveyed to Samuel and Marion Dixon and recorded in Clearfield in deed book 404, page 310. The said Marion Dixon having predeceased her husband, the hereinabove described premises became vested in Samuel Dixon as surviving tenant by the entitlization. The said Samuel Dixon having died on February 1, 1982, and by his Last Will and Testament, dated January 26, 1982, and duly entered by probate in the Office of the Register of Wills of Clearfield County, Pennsylvania, in file No. 87-49, at Will Book Volume 56, page 420, did give, devise and bequeath his real estate, including the herein described premises, to Samuel L. Dixon and Janice M. Parks, the Grantees herein.

EXCEPTING AND RESERVING all exceptions and reservations as contained in prior deeds.

BUT PROVIDED ALWAYS, that if Mortgagor does pay or cause this Mortgage and the debt or debts hereby secured to be paid in full, then this Mortgage and the estate hereby granted shall cease and determine and become void, anything herein to the contrary notwithstanding.

The covenants herein contained shall bind, and the benefits and advantages shall inure to, the respective heirs, executors, administrators, successors, and assigns of the parties hereto. Whenever used, the singular number shall include the plural, the plural the singular, and the use of any gender shall be applicable to all genders.

Payment of this Mortgage is subject to the terms and conditions of said Promissory Note of even date between Mortgagor and Mortgaggee.

IN WITNESS WHEREOF, the said Mortgagor has signed this Mortgage, with seal(s) affixed, on the date first above written:

**Received, Sealed and Delivered in the Presence of**

David C. Clegg

Samuel K. Dixon

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I certify the precise residence of the Mortgagors to be 1583 E. PLEASANT VALLEY BLVD., ALTOONA, PENNSYLVANIA 16602.

Abu Cheh

COMMONWEALTH OF PENNSYLVANIA

**COUNTY OF**

On this 29th day of May, 1891, before me Loretta J. German,  
the undersigned officer, personally appeared Samuel K. Dixon,  
known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and  
acknowledged that he as Mangagor has executed the same for the purposes herein  
contained,

Notarial Seal  
Lorraine J. Gehman, Notary Public  
Logan Township, Blair County  
Pennsylvania  
My Commission Expires January 2003  
Member, Pennsylvania Association of Notaries

Tribute to Dr. S. S. Deshpande

CLAYFIELD COUNTY  
FRIENDS OF RECORD  
TIME 2:47 PM  
FMS 1150

COMMONWEALTH  
OF PENNSYLVANIA  
COUNTY OF CЛЕАР

The Correspondence Office of Bank Country, Liverpool,  
Bleeding Heart Lane, do  
order Books, Vol. 1401. Page A 43  
affix under my hand and seal of the said  
office, the day and year aforesaid.

RECORDED OR DEEUS.

My Commission Expires  
First Monday in January, 1992

• SPACE ABOVE THIS LINE FOR RECORDER'S USE

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Bible

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## FAIR DEBT COLLECTION PRACTICES ACT 30 DAY NOTICE

By law, this law firm is required to advise you that unless within 30 days after receipt of this notice you dispute the validity of this debt or any portion thereof, the debt will be assumed to be valid by us. If said notification is sent to us in writing, we are required to provide you with verification of the debt. In the event within a 30-day period you request in writing the name of the original creditor, it will be provided to you if different from the current creditor. In the event that you dispute the debt and/or request the name of the original creditor in writing within the 30-day period, no further action will be taken to obtain Judgment in the pending lawsuit until the verification and/or name of the original creditor has been provided to you.

This law firm is attempting to collect this debt for our client and any information obtained will be used for that purpose.

The above Notice is being given pursuant to the Fair Debt Collection Practices Act and is separate and distinct from the foregoing Complaint which must be responded to in conformity with the instructions therein. Because of the difference in time parameters, we will not move for Default Judgment for at least thirty (30) days from the date of service of this Complaint upon you, and if you request verification, we will not move for Default judgment until a reasonable time after verification has been provided, and after the expiration of the thirty (30) day period from the date of service.

## VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, she is an attorney for the Plaintiff herein; makes this Verification based upon the facts as supplied to her by the Plaintiff and/or its agents and because the Plaintiff is outside the jurisdiction of the court and the Plaintiff's Verification cannot be obtained within the time allowed for filing of this pleading, and that the facts set forth in the foregoing pleading are true and correct to the best of her knowledge, information and belief.



---

Kimberly J. Hong, Esquire

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13796

C & G SAVINGS BANK ASSIGNEE OF FAMILY MOBILE HOMES, INC. 02-1250-CD

VS.

SAMUEL K. DIXON, DECEASED UNKNOWN HEIRS, SUCCESSORS, ASSIG

WRIT OF EXECUTION REAL ESTATE

**SHERIFF RETURNS**

**NOW, APRIL 14, 2003 RETURNED WRIT OF EXECUTION AND ADVANCE CHECKS TO  
ATTORNEY KIMBERLY HONG AT HER REQUEST.**

---

Return Costs

Cost	Description
0.00	NO COSTS RETURNED TO ATTORNEY

Sworn to Before Me This

14<sup>th</sup> Day Of April 2003  
William A. Shaw

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

So Answers,

Chester Hawkins  
By Cynthia Butler, Deputy Sheriff  
Chester A. Hawkins  
Sheriff

**FILED**  
01-2139 674 MOC  
APR 14 2003

William A. Shaw  
Prothonotary

**WELTMAN, WEINBERG & REIS, CO., L.P.A.**  
**2718 KOPPERS BUILDING**  
**436 SEVENTH AVENUE**  
**PITTSBURGH, PA 15219**  
**(412) 434-7955**  
**FAX (412) 434-7959**

SEND TO FAX NO: (814) 765-5915

TO: Sheriff Hawkins

FROM: Heidi J. Kelly  
(hkelly@weltman.com)

DATE SENT: Thursday, April 10, 2003

Number of Pages: 1

RE: Dixon, Samuel

\*\*\*\*\*  
Please be advised that our office will be re-serving the complaint per court order with the sheriff posting the property. You will receive direction cards shortly for the posting. If possible, please send back the execution packet that we have sent. We will re-file after service is complete and judgment is obtained. Thanks for your assistance to this matter.

\*\*\*\*\*  
\*\*\*CONFIDENTIALITY NOTICE\*\*\*

The documents accompanying this telecopy transmission contain confidential information belonging to the sender which is legally privileged. This information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this telecopied information is strictly prohibited. If you have received this telecopy in error, please immediately notify us by telephone to arrange for the return of the original documents to us.

COUNTY OF

CLEARFIELD

## APPLICATION FOR A PENNSYLVANIA LICENSE TO CARRY FIREARMS

FOR USE BY ISSUING AUTHORITY ONLY

SIGNATURE \_\_\_\_\_

LICENSE NO. \_\_\_\_\_

DATE APPLIED \_\_\_\_\_

DATE APPROVED \_\_\_\_\_

DATE REJECTED \_\_\_\_\_

REASON FOR REJECTION: \_\_\_\_\_

PHOTOGRAPH  
APPROXIMATELY  
THIS SIZE

## APPLICANT INFORMATION - TYPE/PRINT IN BLUE OR BLACK INK

1. LAST NAME		2. JR., ETC.	3. FIRST NAME	4. MIDDLE NAME	5. DATE OF BIRTH	6. AGE	7. HEIGHT	8. WEIGHT
9. SEX	10. RACE	11. EYE COLOR	12. HAIR COLOR	13. DRIVER'S LICENSE NO./STATE (IF AVAILABLE)	14. SOCIAL SECURITY NO.	15. HOME TELEPHONE NO. ( ) -		
16. STREET ADDRESS				17. CITY		18. STATE	19. ZIP CODE	
20. EMPLOYER/BUSINESS NAME				21. WORK TELEPHONE NO. ( ) -		22. OCCUPATION		
23. ADDRESS				24. CITY		25. STATE	26. ZIP CODE	
27. REASON FOR A LICENSE TO CARRY FIREARMS:								
<input type="checkbox"/> SELF-DEFENSE		<input type="checkbox"/> EMPLOYMENT		<input type="checkbox"/> HUNTING & FISHING		<input type="checkbox"/> TARGET SHOOTING		<input type="checkbox"/> GUN COLLECTING
<input type="checkbox"/> OTHER: _____								

## 28. TWO REFERENCES - NOT IMMEDIATE FAMILY MEMBERS

NAME	ADDRESS	TELEPHONE NO. ( ) -
NAME	ADDRESS	TELEPHONE NO. ( ) -

29. HAVE YOU EVER BEEN CONVICTED OF A CRIME ENUMERATED IN SECTION 6105 (b), OR DO ANY OF THE CONDITIONS UNDER 6105 (c) APPLY TO YOU? (READ INFORMATION ON BACK PRIOR TO ANSWERING)	<input type="checkbox"/> YES <input type="checkbox"/> NO
30. ARE YOU NOW CHARGED WITH, OR HAVE YOU EVER BEEN CONVICTED OF A CRIME PUNISHABLE BY IMPRISONMENT FOR A TERM EXCEEDING ONE YEAR? (THIS DOES NOT INCLUDE FEDERAL OR STATE OFFENSES PERTAINING TO ANTITRUST, UNFAIR TRADE PRACTICES, RESTRAINTS OF TRADE, OR REGULATION OF BUSINESS; OR STATE OFFENSES CLASSIFIED AS MISDEMEANORS AND PUNISHABLE BY A TERM OF IMPRISONMENT NOT TO EXCEED TWO YEARS.) (READ BLOCK 30 INFORMATION ON BACK PRIOR TO ANSWERING)	<input type="checkbox"/> YES <input type="checkbox"/> NO
31. HAVE YOU EVER BEEN CONVICTED OF AN OFFENSE UNDER THE ACT OF APRIL 14, 1972 (P.L. 233, NO. 64), KNOWN AS THE CONTROLLED SUBSTANCE, DRUG, DEVICE AND COSMETIC ACT?	<input type="checkbox"/> YES <input type="checkbox"/> NO
32. ARE YOU AN INDIVIDUAL WHO, WITHIN THE PAST TEN YEARS, HAS BEEN ADJUDICATED A DELINQUENT FOR A CRIME ENUMERATED IN SECTION 6105 (REFER TO INFORMATION ON BACK), OR FOR AN OFFENSE UNDER THE CONTROLLED SUBSTANCE, DRUG, DEVICE, AND COSMETIC ACT?	<input type="checkbox"/> YES <input type="checkbox"/> NO
33. ARE YOU AN INDIVIDUAL WHO IS NOT OF SOUND MIND OR WHO HAS EVER BEEN COMMITTED TO A MENTAL INSTITUTION?	<input type="checkbox"/> YES <input type="checkbox"/> NO
34. DO YOU POSSESS A CURRENT LICENSE, PERMIT OR SIMILAR DOCUMENT TO CARRY A FIREARM FROM A STATE OTHER THAN PENNSYLVANIA? (IF YES, ATTACH PHOTOCOPY TO APPLICATION)	<input type="checkbox"/> YES <input type="checkbox"/> NO
35. ARE YOU A UNITED STATES CITIZEN? IF NO, ENTER IMMIGRATION IDENTIFICATION NUMBER: _____	<input type="checkbox"/> YES <input type="checkbox"/> NO
36. ARE YOU AN INDIVIDUAL WHO HAS BEEN DISCHARGED FROM THE ARMED FORCES OF THE UNITED STATES UNDER DISHONORABLE CONDITIONS?	<input type="checkbox"/> YES <input type="checkbox"/> NO
37. IS YOUR CHARACTER AND REPUTATION SUCH THAT YOU WOULD BE LIKELY TO ACT IN A MANNER DANGEROUS TO PUBLIC SAFETY?	<input type="checkbox"/> YES <input type="checkbox"/> NO
38. ARE YOU A HABITUAL DRUNKARD?	<input type="checkbox"/> YES <input type="checkbox"/> NO

39. I HAVE NEVER BEEN CONVICTED OF A CRIME OF VIOLENCE IN THE COMMONWEALTH OF PENNSYLVANIA OR ELSEWHERE. I AM OF SOUND MIND AND HAVE NEVER BEEN COMMITTED TO A MENTAL INSTITUTION. I HEREBY CERTIFY THAT THE STATEMENTS CONTAINED HEREIN ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF. I UNDERSTAND THAT, IF I KNOWINGLY MAKE ANY FALSE STATEMENTS HEREIN, I AM SUBJECT TO PENALTIES PRESCRIBED BY LAW. I AUTHORIZE THE SHERIFF, OR HIS DESIGNEE, OR, IN THE CASE OF FIRST CLASS CITIES, THE CHIEF OR HEAD OF THE POLICE DEPARTMENT, OR HIS DESIGNEE, TO INSPECT ONLY THOSE RECORDS OR DOCUMENTS RELEVANT TO INFORMATION REQUIRED FOR THIS APPLICATION. THIS CERTIFICATION IS MADE SUBJECT TO BOTH THE PENALTIES OF SECTION 4904 OF THE CRIMES CODE (18 Pa.C.S. 4904) RELATING TO UNSWORN FALSIFICATIONS TO AUTHORITIES AND THE UNIFORM FIREARMS ACT.
--

SIGNATURE OF APPLICANT: \_\_\_\_\_

DATE OF APPLICATION: \_\_\_\_\_

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

NO.: 02-1250-CD

Plaintiff,  
vs.

ISSUE NO.:

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

CODE:

TYPE OF PLEADING:

Defendants.

**PRAECIPE TO REINSTATE COMPLAINT  
IN MORTGAGE FORECLOSURE**

FILED ON BEHALF OF:  
PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

Kimberly J. Hong, ESQUIRE  
Pa. I.D. #74950

WELTMAN, WEINBERG & REIS CO., L.P.A.  
Firm #339  
2718 KOPPERS BUILDING  
436 SEVENTH AVENUE  
PITTSBURGH, PA 15219  
(412) 434-7955  
WWR#02663143

**FILED**

APR 21 2003

William A. Shaw  
Prothonotary

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

NO.: 02-1250-CD

Plaintiff,  
vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendants.

PRAECIPE TO REINSTATE COMPLAINT

Kindly reinstate the Complaint in the above-captioned matter.

WELTMAN, WEINBERG & REIS CO., L.P.A.



---

Kimberly J. Hong, Esquire  
Pa. I.D. #74950  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

FILED

Atty Ad. 7.00

3/24/04 ~~2nd~~  
ARR 21/04  
2 complaints re-instated  
to Sheriff

William A. Shaw  
Prothonotary

ICC Shss

9/21

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

Plaintiff

No.: 02-1250-CD

vs.

**TYPE OF PLEADING:**

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,  
Defendant.

**PRAECIPE TO STRIKE JUDGMENT**

FILED ON BEHALF OF:

Plaintiff

COUNSEL OF RECORD OF  
THIS PARTY:

Kimberly J. Hong  
PA I.D. #74950

Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

WWR#02663143

**FILED**

APR 21 2003

William A. Shaw  
Prothonotary

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

Plaintiff

No.: 02-1250-CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

PRAECIPE TO STRIKE JUDGMENT

PROTHONOTARY:

At the request of the undersigned attorneys for the Plaintiff, you are directed to  
strike the judgment on the above referenced case number.

Respectfully submitted:

Weltman, Weinberg & Reis Co., L.P.A.



By:

Kimberly J. Hong  
Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

Sworn and subscribed before  
This 17th day of April, 2003.

Angela M. Schofield  
Notary Public

NOTARIAL SEAL

ANGELA M. SCHOFIELD, NOTARY PUBLIC  
CITY OF PITTSBURGH, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES MARCH 8, 2006

FILED May 7.00

12:40 PM  
APR 21 2003

No CC

William A. Shaw  
Prothonotary

*ASST*

In The Court of Common Pleas of Clearfield County, Pennsylvania

C&Q SAVINGS BANK

v.s.

DIXON, SAMUEL K.. Deceased (unknown heirs al)

Sheriff Docket #

13041

02-1250-CD

COMPLAINT IN MORTGAGE FORECLOSURE

**SHERIFF RETURNS**

---

NOW APRIL 29, 2003 AT 11:38 PM POSTED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE AT RD#1 BOX 494,  
MORRISDALE, CLEARFIELD COUNTY, PENNSYLVANIA.

**FILED**

0 9:02 AM

MAY 01 2003

William A. Shaw  
Prothonotary

---

Return Costs

Cost	Description
18.36	SHERIFF HAWKINS PAID BY: ATTY CK# 8087441
10.00	SURCHARGE PAID BY: ATTY Ck# 8087442

---

Sworn to Before Me This

So Answers,

1st Day Of May 2003  
William A. Shaw

*Chester A. Hawkins*  
by / Marilyn Hause  
Chester A. Hawkins  
Sheriff

4-21-03 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.  
*Willie L. Shahan*  
Deputy Prothonotary

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

C&G SAVINGS BANK, assignee of  
s/i/l/t FAMILY MOBILE HOMES, INC.,

Plaintiff,

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

TO: DEFENDANT:

YOU ARE HEREBY NOTIFIED TO PLEAD TO THE  
ENCLOSED COMPLAINT WITHIN TWENTY (20) DAYS  
FROM SERVICE HEREOF OR A DEFAULT JUDGMENT  
MAY BE ENTERED AGAINST YOU.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: *[Signature]*  
ATTORNEYS FOR PLAINTIFF

I HEREBY CERTIFY THE ADDRESS OF PLAINTIFF IS:  
P.O. Box 2060  
Alliance, OH 44601

AND THE DEFENDANT ARE:  
RD 1, Box 494  
Morrisdale, PA 16858

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: *[Signature]*  
ATTORNEYS FOR PLAINTIFF

I HEREBY CERTIFY THAT THE LOCATION OF THE REAL  
ESTATE AFFECTED BY THIS LIEN IS:

RD 1, Box 494  
Morrisdale, PA 16858  
Twp of Graham  
WELTMAN, WEINBERG & REIS CO., L.P.A.

By: *[Signature]*  
ATTORNEYS FOR PLAINTIFF

NO. 02-1250-CO

ISSUE NO.:

CODE:

TYPE OF PLEADING:

COMPLAINT IN MORTGAGE  
FORECLOSURE

FILED ON BEHALF OF:  
PLAINTIFF

COUNSEL OF RECORD FOR THIS  
PARTY:

Kimberly J. Hong, ESQUIRE  
Pa. I.D. #74950

WELTMAN, WEINBERG & REIS CO., L.P.A.

Firm #339  
2718 KOPPERS BUILDING  
436 SEVENTH AVENUE  
PITTSBURGH, PA 15219  
(412) 434-7955  
WWR#02663143

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

AUG 12 2002

Attest,

*Willie L. Shahan*  
Prothonotary/  
Clerk of Courts

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

C&G SAVINGS BANK, assignee of  
s/i/i/t FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO:

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

NOTICE TO DEFEND

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:

PA Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

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

C&G SAVINGS BANK, s/i/i/t.  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO:

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

CIVIL ACTION - COMPLAINT IN MORTGAGE FORECLOSURE

And now, comes Plaintiff, C&G Savings Bank, s/i/i/t Family Mobile Homes, Inc., by and through its attorneys, WELTMAN, WEINBERG & REIS CO., L.P.A., and files this Complaint in Mortgage Foreclosure, averring in support thereof the following:

1. The Plaintiff is C&G Savings Bank, s/i/i/t Family Mobile Homes, Inc., a lending institution duly authorized to conduct business within the Commonwealth of Pennsylvania (hereinafter "Plaintiff").
2. The Defendant is Unknown Heirs, Successors, Assigns and all persons, firms, or associations claiming right, title and interest from or under Samuel K. Dixon, deceased, whose last known address is RD1, Box 494, Morrisdale, PA 16858.
3. On or about May 29, 1991, Samuel K. Dixon borrowed the sum of \$24,177.00 from Plaintiff pursuant to the terms of a written agreement, and as security for repayments thereof, Samuel K. Dixon made, executed and delivered to Plaintiff, a Mortgage in the original principal amount of \$24,177.00 on the premises hereinafter described, said Mortgage being recorded in the Office of the Recorder of Deeds of Clearfield County on June 5, 1991 in Mortgage Book Volume 1401, Page 43. A true and correct copy of said Mortgage containing a description of the premises subject to said Mortgage is marked Exhibit "A", attached hereto and made a part

4. Family Mobile Homes, Inc., assigned all of its right, title and interest in and to the Mortgage to Columbia Savings Association, pursuant to an Assignment of Mortgage, which was recorded on July 22, 2001, in Mortgage Book Volume 1409, Page 24.

5. Columbia Savings Association, assigned all of its right, title and interest in and to the Mortgage to C&G Savings Bank, pursuant to an Assignment of Mortgage

6. Plaintiff believes and therefore avers that Samuel K. Dixon is deceased.

7. Samuel K. Dixon was the current record and real owner of the aforesaid

mortgaged premises at the time of his death.

8. The aforesaid Note and Mortgage are in default.

9. Demand for payment has been made upon the Defendant by Plaintiff, but Defendant was unable to pay the principal balance, interest or any other portion thereof to Plaintiff.

10. On or about April 19, 2002, Defendant was mailed Notice of Homeowner's Emergency Assistance Act of 1983, in compliance with the Homeowner's Emergency Assistance Act, Act 91 of 1983 and pursuant to 12 PA Code Chapter 31, Subchapter B, Section 31.201 et seq.

11. The amount due and owing Plaintiff is as follows:

Principal	\$ 12,619.98
Interest thru 7/18/02	\$ 816.53
Late Charge thru 7/18/02	\$ 0.00
Execution Costs thru 7/18/02	\$ 0.00
Attorneys' Fees thru 7/18/02	\$ 1,000.00
Other Charges	\$ 50.00
 TOTAL	 \$ 14,486.51

12. Contemporaneously hereunder, Defendant has been advised of the right to dispute the validity of this debt or any part thereof, pursuant to the Fair Debt Collection Practices Act 30 Day Notice, attached hereto marked Exhibit "C" and made a part hereof.

WHEREFORE, Plaintiff demands judgment in Mortgage Foreclosure for the amount due of \$14,486.51, with interest thereon at the rate of \$4.49 per diem from July 18, 2002, plus costs, in addition to late charges and for foreclosure and sale of mortgaged premises.

THIS IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED SHALL BE USED FOR THAT PURPOSE.

WELTMAN, WEINBERG & REIS CO., L.P.A.

  
Kimberly J. Hong, Esquire  
Pa. I.D. #74950  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

vol 1401 page 013

## REAL ESTATE MORTGAGE

THIS MORTGAGE, made and entered into this 29th day of May 1991 by and between the undersigned, Samuel K. Dixon, herein called "Mortgagor", and FAMILY MOBILE HOMES, INC., a Pennsylvania Association having an office and place of business at 1683 E. Pleasant Valley Blvd., Altoona, Pennsylvania 16802, herein called "Mortgagee".

WITNESSETH, that to secure payment by Mortgagor of a Promissory Note of even date herewith, in the total amount of One hundred and twenty-five thousand thirty-three and 20/100 Dollars (\$ 125,033.20), principal sum of One hundred twenty-four thousand one hundred seventy-seven and 00/100 Dollars (\$ 124,177.00), bearing interest at an annual rate of 12.99%, payable in 180 consecutive monthly installments, of Three hundred seventy-five and 74/100 Dollars (\$ 375.74) each (and/or any renewal, refinancing or extension thereof, or other Promissory Note or other agreement to pay which may be substituted therefor, any or all of which are hereinafter referred to as "Promissory Note") and all other obligations of Mortgagor under the terms and provisions of this Mortgage, and obligations which Mortgagor may hereafter, from time to time become obligated to Mortgagee, for payment of, or for additional sums of money advanced by Mortgagee, and it is intended that all of said future advances, debts, or obligations, with interest thereon, will be secured hereby in addition to the advances, debts and obligations presently owing by Mortgagor. Mortgagor does by these presents sell, grant and convey to Mortgagee, all that real estate situated in the County of Clearfield (City, Borough, Township) of known and numbered as Block \_\_\_\_\_ Ward \_\_\_\_\_.

Street Address R.D. 1 Box 493 Morrisdale, Pa. 16838 City, Town, Post Office 1180  
Pennsylvania, and described in Deed recorded in the Recorder's Office of said County at Deed Book Volume 1180  
Page 473 and more particularly described as:  
see attached EXHIBIT A

Assignment 1409/24 7/22/91

TOGETHER with all the buildings and improvements thereon and additions thereto, including all alleys, passageways, rights, easements, privileges, hereditaments and appurtenances whatsoever thereunto belonging, or appurtenant, herein called the Mortgaged Premises.

TO HAVE AND TO HOLD the Mortgaged Premises hereby granted and conveyed unto Mortgagee, to and for the use and benefit of Mortgagor, its successors and assigns, forever.

THIS MORTGAGE IS MADE subject to the following conditions, and Mortgagor 29/088:

1. Mortgagor will make all payments on the due date thereof and perform all other obligations as required or provided herein and in said Promissory Note. Mortgagor, at its option, may defer the payment date of all wholly unpaid installments one or more full months and charge a deferral charge therefor which shall be equal to the interest charge applicable to the month or months in which any installment is not required by reason of a deferral.
2. Mortgagor will pay when due all taxes and assessments levied or assessed against said premises or any part thereof, and will deliver receipts therefor to the Mortgagee upon request.
3. Mortgagor will keep the improvements on said property constantly insured against fire and such other hazards, in such amount and with such carriers as Mortgagor shall require, with loss if any payable to Mortgagor as its interest may be for.
4. Mortgagor will neither commit nor suffer any strip, waste, impairment or deterioration of the mortgaged premises, and will maintain the same in good order and repair.
5. In the event that Mortgagor defaults in the making of any payment due and payable under said Combined Promissory Note and Federal Disclosure Statement, or in the keeping and performance by Mortgagor of any of the conditions or covenants of this Mortgage or said Combined Promissory Note and Federal Disclosure Statement, Mortgagor may forthwith bring an Action of Mortgage Foreclosure hereon, or institute other foreclosure proceedings upon this Mortgage, and may proceed to judgement and execution to recover the balance due on said Promissory Note and any other sums that may be due thereunder including reasonable attorney fees, costs of suit, and costs of sale together with interest after judgement at the applicable rate until the full amount due Mortgagor is paid. In the event Mortgagor fails to maintain insurance against fire and such other hazards as Mortgagor requires, Mortgagor authorizes Mortgagor at its option to obtain such insurance and bill Mortgagor for all costs thereof, which such costs Mortgagor agrees to pay, or to add such costs to the then remaining paid principal balance of Mortgagor's Promissory Note and charge interest thereon at the rate of interest contained in such Note.
6. Mortgagor agrees that this mortgage is security for the payment of the aforesaid obligations and all other direct or contingent liabilities of the Mortgagor hereto to the Mortgagor hereof due or to become due whether now existing or hereafter contracted.
7. If all or part of the sums secured by this Mortgage are lent to the Mortgagor to acquire title to the property, this Mortgage is hereby declared to be a Purchase Money Mortgage.
8. Mortgagor hereby waives and releases all benefits and relief from any and all appraisal, stay and exemption laws, now in force or hereafter passed, either for the benefit or relief of Mortgagor, or limiting the balance due under said Promissory Note to a sum not in excess of the amount actually paid by the purchaser of the Mortgaged Premises at a sale thereof in

vol 1401 page 044

## Exhibit "A"

COMMENCING at an iron pipe which is the common corner of George Ogden, Horace A. and Janice N. Parks and the property to be described for Grantee; thence along lands of Horace A. and Janice N. Parks, North eighty-eight degrees, forty-five minutes West ( $N 88^{\circ} 45' W$ ) one hundred sixty and thirty-nine hundredths feet (160.39) to an iron pipe; thence still along lands of Horace A. and Janice N. Parks, South no degrees, forty-eight minutes, fifteen seconds East ( $S 08^{\circ} 48' 15" E$ ) two hundred forty-three and twenty-seven hundredths feet (243.27) to an iron pipe and the Northwest corner of James J. Boron; thence along lands of James J. Boron, North eighty-nine degrees, eleven minutes, forty-five seconds West ( $N 89^{\circ} 11' 45" W$ ) six hundred fifty-five and fifty-three hundredths feet (655.53) to an iron pipe on line of Charles Chilcott; thence along lands of Charles Chilcott, North two degrees, twenty-one minutes, fifteen seconds East ( $N 2^{\circ} 21' 15" E$ ) five hundred forty-four and sixty-five hundredths feet (544.65) to an iron pipe and the Southwest corner of Ann Rothrock; thence along lands of Ann Rothrock, South eighty-eight degrees, fifty-five minutes, thirty-five seconds East ( $S 88^{\circ} 55' 35" E$ ) seven hundred eighty-threes and thirty-three hundredths feet (773.93) to an iron pipe and the Northwest corner of George Ogden; thence along lands of George Ogden, South four degrees, twenty-four minutes East ( $S 04^{\circ} 24' E$ ) three hundred feet (300.0) to an iron pipe and place of beginning.

CONTAINING 9.08 acres and being part of the same premises that were conveyed to Samuel and Marion Dixon and recorded in Clearfield in deed book 404, page 310. The said Marion Dixon having predeceased her husband, the hereinabove described premises became vested in Samuel Dixon as surviving tenant by the entitlization. The said Samuel Dixon having died on February 1, 1982, and by his Last Will and Testament, dated January 26, 1984, and duly entered by probate in the Office of the Register of Wills of Clearfield County, Pennsylvania, in file No. 87-49, at Will Book Volume 56, page 420, did give, devise and bequeath his real estate, including the herein described premises, to Samuel E. Dixon and Janice N. Parks, the Grantees herein.

EXCEPTING AND RESERVING all exceptions and reservations as contained in prior deeds.

M 1401 m 045

BUT PROVIDED ALWAYS, that if Mortgagor does pay or cause this Mortgage and the debt or debts hereby secured to be paid in full, then this Mortgage and the estate hereby granted shall cease and determine and become void, anything herein to the contrary notwithstanding.

The covenants herein contained shall bind, and the benefits and advantages shall inure to, the respective heirs, executors, administrators, successors, and assigns of the parties hereto. Whenever used, the singular number shall include the plural, the plural the singular, and the use of any gender shall be applicable to all genders.

Payment of this Mortgage is subject to the terms and conditions of said Promissory Note of even date between Mortgagor and Lender.

IN WITNESS WHEREOF, the said Mortgagor has signed this Mortgage, with seal(s) affixed, on the date first above shown.

Signed, Sealed and Dated in the Presence of:

*Abdi Chish*

*Samuel K. Dixon* (SEAL)

(SEAL)

(SEAL)

(SEAL)

I certify the precise residence of the Mortgagor to be 1683 E. PLEASANT VALLEY BLVD., ALTOONA, PENNSYLVANIA 16602.

*Abdi Chish*

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF

On this 29th day of May, 1991, before me Loretta J. Gehman,  
the undersigned officer, personally appeared Samuel K. Dixon,  
known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and  
acknowledged that he as Mortgagor has executed the same for the purposes herein  
contained.

In Witness Whereof, I hereunto set my hand and official seal.  
My commission expires:

*Loretta J. Gehman*  
Notary Seal  
Loretta J. Gehman, Notary Public  
Logan Twp., Blair County  
Commissioner of Deeds  
Member, Pennsylvania Association of Notaries

Title of Office

CLEARFIELD COUNTY  
ENTERED GF REC'D D-5-91 2  
TUES 2 4 7 PM  
BY JENNIFER MURRAY  
FAX 515-3533  
MICHAEL R. LIPSEY, Recorder

COMMONWEALTH  
OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

RECORDED on this 5th day  
of July, A.D. 1991. In  
the Recorder's Office of said County, in the  
Recorder's Office, Recorder's  
Office Book, Vol. 1401, Page 043.

I, Abdi Chish, do  
hereby affix my hand and seal of the said  
officer, this day and year aforesaid.

*Abdi Chish*  
RECORDED OF DEEDS

RECORDED  
My Commission Expires  
First Monday in January, 1992

SPACE ABOVE THIS LINE FOR RECORDER'S USE

## FAIR DEBT COLLECTION PRACTICES ACT 30 DAY NOTICE

By law, this law firm is required to advise you that unless within 30 days after receipt of this notice you dispute the validity of this debt or any portion thereof, the debt will be assumed to be valid by us. If said notification is sent to us in writing, we are required to provide you with verification of the debt. In the event within a 30-day period you request in writing the name of the original creditor, it will be provided to you if different from the current creditor. In the event that you dispute the debt and/or request the name of the original creditor in writing within the 30-day period, no further action will be taken to obtain Judgment in the pending lawsuit until the verification and/or name of the original creditor has been provided to you.

This law firm is attempting to collect this debt for our client and any information obtained will be used for that purpose.

The above Notice is being given pursuant to the Fair Debt Collection Practices Act and is separate and distinct from the foregoing Complaint which must be responded to in conformity with the instructions therein. Because of the difference in time parameters, we will not move for Default Judgment for at least thirty (30) days from the date of service of this Complaint upon you, and if you request verification, we will not move for Default judgment until a reasonable time after verification has been provided, and after the expiration of the thirty (30) day period from the date of service.

## VERIFICATION

The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, she is an attorney for the Plaintiff herein; makes this Verification based upon the facts as supplied to her by the Plaintiff and/or its agents and because the Plaintiff is outside the jurisdiction of the court and the Plaintiff's Verification cannot be obtained within the time allowed for filing of this pleading, and that the facts set forth in the foregoing pleading are true and correct to the best of her knowledge, information and belief.



---

Kimberly J. Hong, Esquire

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff  
vs.

Civil Action No. 02-1250-CD

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

TYPE OF PLEADING:

PROOF OF SERVICE

Filed on Behalf of:

Plaintiff

Counsel or Record for this Party:

Kimberly J. Hong  
PA I.D. #74950

Weltman, Weinberg & Reis Co., L.P.A.  
27181 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
WWR #02663143

JUL 2 2003

Weltman, Weinberg & Reis Co., L.P.A.  
Prothonotary

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff

vs.

Civil Action No. 02-1250-CD

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

PROOF OF SERVICE

BEFORE ME, the undersigned authority, personally appeared Kimberly J. Hong, Esquire, who according to law deposes and says that a copy of the Complaint in Mortgage Foreclosure has been served on the Defendant, UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE AND INTEREST FROM OR UNDER Samuel K. Dixon, deceased.

1. On or about August 30, 2001, Plaintiff received a signed Order of Court permitting service, on the Defendant, to be complete and valid upon posting of the property and publication. Said Order of Court is attached as Exhibit "A".

2. On or about September 25, 2002, Plaintiff published a copy of the Notice in Courier Express. Said Proof of Publication is attached as Exhibit "B".

3. On or about September 27, 2002, Plaintiff published a copy of the Notice in the Clearfield County Legal Journal. Said Proof of Publication is attached as Exhibit "C".

4. On or about April 29, 2003, Clearfield County Sheriff posted the property with a copy of the complaint in mortgage foreclosure. Said returns are marked as Exhibit "D".

WELTMAN, WEINBERG & REIS, CO., L.P.A.

Kimberly J. Hong  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219

Sworn to and subscribed before me  
This 8th day of May, 2003.

Angela M. Schofield  
Notary Public

NOTARIAL SEAL  
ANGELA M. SCHOFIELD, NOTARY PUBLIC  
CITY OF PITTSBURGH, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES MARCH 8, 2006

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,  
v.

NO: 02-1250-CJ

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

ORDER OF COURT

AND NOW, to wit, this 30<sup>th</sup> day of August, 2001, upon consideration  
of the within Motion for Special Service of the Complaint in Mortgage Foreclosure Pursuant to  
Special Order of Court, it is hereby ORDERED, ADJUDGED and DECREED that the Plaintiff is  
permitted to serve Defendant, Unknown Heirs, Successors, Assigns, and all persons, firms, or  
associations claiming right title and interest from or under Samuel K. Dixon, deceased, by  
directing the Sheriff of Clearfield County to post the property at RD1, Box 494, Morrisdale, PA  
16858, and by publication pursuant to Pa. R.C.P. Rule 430 (b) (2) in one legal journal and one  
newspaper of general circulation. Service of the Complaint shall be deemed complete and valid  
upon mailing and publication by the Plaintiff and by posting by the Sheriff.

BY THE COURT:

/s/ JOHN K. REILLY, JR.

\_\_\_\_\_  
J.

\_\_\_\_\_  
I declare under penalty of perjury, this to be a true  
copy of the original  
document in this case.

AUG 30 2002

Attest: William J. Reilly  
Prothonotary

**PROOF OF PUBLICATION OF NOTICE APPEARING IN THE  
PRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT  
PUBLISHED BY McLEAN PUBLISHING COMPANY,  
DUBOIS PENNSYLVANIA**

Legals  
IN THE COURT OF COMMON  
PLEAS OF CLEARFIELD COUN-  
TY, PENNSYLVANIA  
CIVIL DIVISION

C&G SAVINGS BANK, assignee  
of FAMILY MOBILE HOMES,  
INC., Plaintiff

Under act 587, Approved May 16, 1929, P.L. 1784

LVANIA  
FIELD

SS:

Li Vs.  
E UNKNOWN HEIRS,  
SV SUCCESSORS, ASSIGNS, AND  
W ALL PERSONS, FIRMS OR  
Cc ASSOCIATIONS CLAIMING  
RIGHT, TITLE AND INTEREST  
th FROM OR UNDER SAMUEL K.  
re DIXON, deceased,  
ex Defendants  
da Case No.: 02-1250-CD

ing Director or Dory Ferra, Classified Advertising Supervisor of the **Courier-Sunday/Jeffersonian Democrat** of the County and State aforesaid, being duly  
ays that the **Courier-Express**, a daily newspaper, the **Tri-County Sunday**, a  
**Jeffersonian Democrat**, a weekly newspaper published by McLean Publishing  
ers Street, City of DuBois, County and State aforesaid, which was established in  
which date said, the daily publication and the weekly publications, has been  
County, and that a copy of the printed notice of publication is attached hereto  
as printed and published in the regular editions of the paper on the following

NOTICE

If you wish to defend, you must  
enter a written appearance  
personally or by attorney and file  
your defenses or objections in  
writing with the court. You are  
warned that if you fail to do so the  
case may proceed without you  
and a judgment may be entered  
against you without further notice  
for the relief requested by the  
plaintiff. You may lose money or  
property or other rights important  
to you.

YOU SHOULD TAKE THIS  
NOTICE 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.

PA Bar Association  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375  
9/25/02

es that he is an officer duly authorized by the **Courier-Express**, a daily  
**Sunday**, a weekly newspaper, and/or **Jeffersonian Democrat**, a weekly  
foregoing statement under oath and also declared that affiant is not  
matter of the aforesaid notice of publication, and that all allegations in the  
to time, place and character of publication are true.

**McLEAN PUBLISHING COMPANY Publisher of  
EXPRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT**

*Linda S. Duttry*

*Robin M. Duttry*

Notary Public

Statement of Advertising Cost  
**McLEAN PUBLISHING COMPANY**

Publisher of

**COURIER-EXPRESS/TRI-COUNTY SUNDAY/  
JEFFERSONIAN DEMOCRAT**  
DuBois, PA

NOTARIAL SEAL  
ROBIN M. DUTTRY, NOTARY PUBLIC  
CITY OF DUBOIS, CLEARFIELD COUNTY  
MY COMMISSION EXPIRES APRIL 16, 2006

TO Weltman, Weinberg & Reis  
For publishing the notice or advertisement  
attached hereto on the above stated dates.....\$ 73.98  
Probating same.....\$ 4.25  
Total.....\$ 78.23

**Publisher's Receipt for Advertising Costs**

The **Courier-Express**, a daily newspaper, **Tri-County Sunday**, a weekly newspaper, and/or  
**Jeffersonian Democrat**, a weekly newspaper, hereby acknowledges receipt of the aforesaid  
advertising and publication costs, and certifies that the same have been fully paid.

Office: Jeffers Street and Beaver Drive, DuBois, PA 15801  
Established 1879, Phone 814-371-4200

**McLEAN PUBLISHING COMPANY**

Publisher of

**COURIER-EXPRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT**

By \_\_\_\_\_

I hereby certify that the foregoing is the original Proof of Publication and receipt for the  
Advertising costs in the subject matter of said notice.

ATTORNEY FOR

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

DIXON -

02463143

C & G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC., Plaintiff  
s. UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE AND INTEREST FROM OR  
UNDER SAMUEL K. DIXON, deceased,  
Defendants.

NOTICE

If you wish to defend, you must enter a  
written appearance personally or by attorney  
and file your defenses or objections in  
writing with the court. You are warned that  
you fail to do so the case may proceed  
without you and a judgment may be entered  
against you without further notice for the  
relief requested by the plaintiff. You may  
lose money or property or other rights  
important to you.

YOU SHOULD TAKE THIS NOTICE  
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.

PA Bar Association, P.O. Box 186,  
Harrisburg, PA 17108, 800-692-7375.

WELTMAN, WEINBERG & REIS,  
P.C., L.P.A., 2718 Koppers Building, 436  
Seventh Avenue, Pittsburgh, PA 15219.

## PROOF OF PUBLICATION

SYLVANIA :

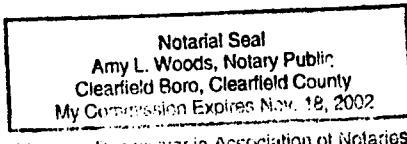
:

ARFIELD :

I day of September AD 2002, before me, the subscriber, a  
not for said County and State, personally appeared Gary A.  
of the Clearfield County Legal Journal of the Courts of  
and that the annexed is a true copy of the notice or  
published in said publication in the regular issues of Week of  
02 Vol. 14 No. 39. And that all of the allegations of this  
date, time, place, and character of the publication are true.

  
\_\_\_\_\_  
Gary A. Knaresboro, Esquire  
Editor

Sworn and subscribed to before me the day and year aforesaid.

  
\_\_\_\_\_  
Notary Public  
My Commission Expires

Weltman, Weinberg & Reis, Co.  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh PA 15219

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff

1250-CD  
No. 02-12-CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

PRAECIPE FOR DEFAULT JUDGMENT  
(IN REM)

FILED

JUL 03 2003

I HEREBY CERTIFY THE ADDRESS OF PLAINTIFF IS:  
P.O. Box 2060  
Alliance, OH 44601

William A. Shaw  
Prothonotary 

Kimberly J. Hong, Esquire  
PA I.D. NO. 74950

AND THE DEFENDANT IS:  
RD1, Box 494  
Morrisdale, PA 16858

Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

WELTMAN, WEINBERG & REIS CO., L.P.A.  
BY: \_\_\_\_\_  
ATTORNEYS FOR PLAINTIFF

WWR#02663143

THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND ANY  
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff

No. 02-12-CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

**PRAECIPE FOR DEFAULT JUDGMENT (IN REM)**

TO THE PROTHONOTARY:

Kindly enter Judgment against the Defendant, Unknown, Heirs, Successors, Assigns, and all persons, firms or associations claiming right, title, and interest from or under Samuel K. Dixon, deceased, above named, in the default of an Answer, in the amount of \$15,989.19 computed as follows:

Principal	\$ 12,619.98
Interest thru 6/10/03	
at the legal interest rate of \$4.49 per diem	\$ 2,221.45
Late Charges thru 6/10/03	\$ 0.00
Misc. fees thru 6/10/03	\$ 97.76
Execution Costs thru 6/10/03	\$ 0.00
Attorneys fees thru 6/10/03	\$ 1,000.00
Title Search	\$ 50.00
 TOTAL	 \$ 15,989.19

With continuing interest at the aforesaid rate plus appropriate additional attorney fees and costs.

I hereby certify that appropriate Notices of Default, as attached have been mailed in accordance with PA R.C.P. 237.1 on the dates indicated on the Notices.

WELTMAN, WEINBERG & REIS CO., L.P.A.

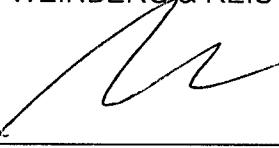


By: \_\_\_\_\_  
Kimberly J. Hong  
Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

**AFFIDAVIT OF NON-MILITARY SERVICE**

The undersigned does hereby verify subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities, that the parties against whom Judgment is to be entered according to the Praeclipe attached are not members of the Armed Forces of the United States or any other military or non-military service covered by the Soldiers and Sailors Civil Relief Act of 1940. The undersigned further states that the information is true and correct to the best of the undersigned's knowledge and belief and upon information received from others.

WELTMAN, WEINBERG & REIS CO., L.P.A.

By:   
Kimberly J. Hong  
Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff

vs.

Civil Action No. 02-12-CD

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

**IMPORTANT NOTICE**

TO: UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE AND INTEREST  
FROM OR UNDER Samuel K. Dixon, deceased  
RD1, Box 494  
Morrisdale, PA 16858

Date of Notice:

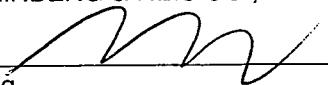
6/16/03

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

PA Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: \_\_\_\_\_

  
Kimberly J. Hong  
Weltman, Weinberg & Reis co. L.P.A.  
2718Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
(412) 434-7955

THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND  
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

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

C&G Savings Bank  
Plaintiff(s)

No.: 2002-01250-CD

Real Debt: \$15,989.19

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Samuel K. Dixon Estate  
Defendant(s)

Entry: \$20.00

Instrument: Judgment

Date of Entry: July 3, 2003

Expires: July 3, 2007

Certified from the record this 3rd day of July, 2003

---

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

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff

No. 02-12-CD

1250-CD  
CO  
CO  
Hand

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

NOTICE OF JUDGMENT OR ORDER

TO: Unknown Heirs, Successors, Assigns, and all  
persons, firms or associations claiming right, title  
and interest from or under Samuel K. Dixon, deceased  
RD1, Box 494  
Morrisdale, PA 16858

Plaintiff  
 Defendant  
 Garnishee

You are hereby notified that the following  
Order or Judgment was entered against you  
on \_\_\_\_\_

Assumpsit Judgment in the amount of \$\_\_\_\_\_ plus costs.  
 Mortgage Foreclosure in the amount of \$15,989.19 plus costs.  
 Trespass Judgment in the amount of \$\_\_\_\_\_ plus costs.  
 If not satisfied within sixty (60) days, your motor vehicle operator's  
license and/or registration will be suspended by the Department of  
Transportation, Bureau of Traffic Safety, Harrisburg, PA.  
 Entry of Judgment of  
 Court Order  
 Non-Pro  
 Confession  
 Default  
 Verdict  
 Arbitration Award

Prothonotary

By: \_\_\_\_\_  
PROTHONOTARY (OR DEPUTY)

THIS LAW FIRM IS ATTEMPTING TO COLLECT THIS DEBT FOR ITS CLIENT AND ANY  
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff, NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

TYPE OF PLEADING:

PRAECIPE FOR WRIT OF EXECUTION

Filed on Behalf of:

PLAINTIFF

Counsel or Record for this Party:

Kimberly J. Hong  
PA I.D. #74950

JUL 2 2003

William A. Shaw  
Notary

Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
WWR #02615844 OZ463143

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

**PRAECIPE FOR WRIT OF EXECUTION**

TO THE PROTHONOTARY:

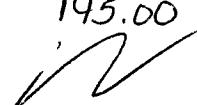
Kindly issue a Writ of Execution in the above matter, directed to the Sheriff of Clearfield  
County against Defendant, Unknown Heirs, Successors, Assigns and all persons, Firms or Associations  
claiming Right, Title and Interest from or under Samuel K. Dixon, deceased, or for the amount of:

1. Judgment Amount	\$ 15,989.19
Interest at the rate of \$ 4.49 per diem from	
6/10/03 thru sale date	\$ 377.16
2. Late Charges thru sale date	\$ 75.16
<b>TOTAL</b>	<b>\$ 16,441.51</b>

With continuing interest at the aforesaid rate plus appropriate additional attorney fees and costs.

Costs (to be added by Prothonotary) \$ 195.00

Date: 7/20/03



Kimberly J. Hong  
Attorney for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, Pennsylvania 15219

1cc & levants

10/2/05 B&H

w/ property descr. to shff

JUL 25 2003

Atty pd. 20.00

William A. Shaw

*SA*

*SA*

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff, NO: 02-1250 CD

VS.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

**AFFIDAVIT PURSUANT TO RULE 3129.1**

COMMONWEALTH OF PENNSYLVANIA )  
 )  
COUNTY OF ALLEGHENY ) SS:

C&G SAVINGS BANK, et. al., Plaintiff in the above action, sets forth as of the date of the Praeclipe for the Writ of Execution was filed the following information concerning the real property of Samuel K. Dixon, deceased, located at RD 1, Box 494, Morrisdale, PA 16858 and is more fully described as follows:

ALL THE RIGHT, TITLE, INTEREST AND CLAIM OF UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE AND INTEREST FROM OR UNDER SAMUEL K. DIXON, deceased, OF, IN AND TO:

ALL THE FOLLOWING DESCRIBED REAL ESTATE SITUATED IN THE TOWNSHIP OF GRAHAM, COUNTY OF CLEARFIELD, COMMONWEALTH OF PENNSYLVANIA. HAVING ERECTED THEREON A DWELLING KNOWN AND NUMBERED AS RD 1 BOX 494, MORRISDALE, PA 16858. DEED BOOK 1190 PAGE 433, PARCEL NUMBER 116-P9-11.

1. The name and address of the owners or reputed owners:

Unknown Heirs, Successors, Assigns and all Persons,  
Firms or Associations claiming Right, Title and Interest  
from or under Samuel K. Dixon, deceased,

RD 1, Box 494,  
Morrisdale, PA 16858

2. The name and address of the Defendants in the judgment:

Unknown Heirs, Successors, Assigns and all Persons,  
Firms or Associations claiming Right, Title and Interest  
from or under Samuel K. Dixon, deceased,

RD 1, Box 494,  
Morrisdale, PA 16858

3. The name and last known address of every judgment creditor whose judgment is a record lien on the real property to be sold:

C&G SAVINGS BANK, et.al. (Plaintiff)

Tax Claim Bureau 230 E. Market Street  
Clearfield, PA 16830

Mid-State Bank and Trust 130 12<sup>th</sup> Ave.  
Altoona, PA 16601

Keystone Credit PO Box 686  
Lock Haven, PA 17745

4. The name and address of the last record holder of every mortgage of record:

C&G SAVINGS BANK, et.al. (Plaintiff)

5. The name and address of every other person who has any record lien on the property:

NONE

6. The name and address of every other person who has any record interest in the property and whose interest may be affected by the sale:

NONE

7. The name and address of every other person whom the Plaintiff has knowledge who has any interest in the property which may be affected by the sale:

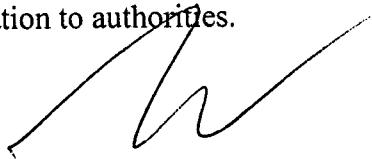
Inheritance Tax Bureau 230 E. Market Street  
Clearfield, PA 16830

Domestic Relations

230 E. Market Street  
Clearfield, PA 16830

The information provided in the foregoing Affidavit is provided solely to comply with the Pennsylvania Rules of Civil Procedure 3129.1 and it is not intended to be a comprehensive abstract of the condition of the title of the real estate which is being sold under this execution. No person or entity is entitled to rely on any statements made herein in regard to the condition of the title of the property or to rely on any statement herein in formulating bids which might be made at the sale of the property.

I verify that the statements made in the Affidavit are true and correct to the best of my personal knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.



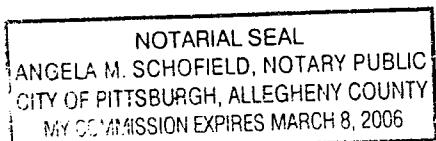
---

Kimberly J. Hong, Esquire  
Attorneys for Plaintiff

Sworn to and subscribed before me

this 21<sup>st</sup> day of July, 2003.

Angela M. Schofield  
Notary Public



**WRIT OF EXECUTION and/or ATTACHMENT**  
**COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD**  
**CIVIL ACTION – LAW**

C&G Savings Bank, assignee of  
Family Mobile Homes, Inc.

Vs.

NO.: 2002-01250-CD

Unknown Heirs, Successors, Assigns,  
and all Persons, Firms or Associations  
claiming right, title and interest from  
or under Samuel K. Dixon, Deceased

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the debt, interest and costs due C&G SAVINGS BANK, assignee of Family Mobile Homes, Plaintiff(s) from Unknown Heirs, Successors, Assigns, and all Persons, Firms or Associations claiming right, title and interest from or under SAMUEL K. DIXON, deceased, Defendant(s):

(1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:  
See Attached Description

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:

Garnishee(s) as follows:

and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;

(3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE:	<b>\$15,989.19</b>	PAID: <b>\$195.00</b>
INTEREST at the rate of \$4.49 per		SHERIFF: \$
diem from 6/10/03 thru sale date:	<b>\$377.16</b>	LATE CHARGES thru sale date: <b>\$75.16</b>
PROTH. COSTS: \$		OTHER COSTS: \$
ATTY'S COMM: \$		
DATE: 07/23/2003		

---

William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this \_\_\_\_\_ day  
of \_\_\_\_\_ A.D. \_\_\_\_\_  
At \_\_\_\_\_ A.M./P.M.

Requesting Party: Kimberly J. Hong  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219

Sheriff

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

LONG FORM DESCRIPTION

ALL that certain piece or parcel of land situated in the Township of Graham, County of Clearfield and State of Pennsylvania, bounded and described as follows:

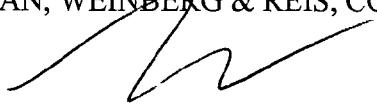
BEGINNING at an iron pipe which is the common corner of George Ogden, Norman A. and Janice M. Parks and the property to be described for Grantee; thence along lands of Norman A. and Janice M. Parks, North eighty-eight degrees, forty-two minutes West (N 88° 42' W) one hundred sixty and thirty-nine hundredths feet (160.39) to an iron pipe, thence still along lands of Norman A. and Janice M. Parks, South no degrees, forty-eight minutes, fifteen seconds East (S 0° 48' 15" E) two hundred forty-three and twenty-seven hundredths feet (243.27) to an iron pipe and the Northeast corner of James J. Boron, thence along lands of James J. Boron, North eighty-nine degrees, eleven minutes, forty-five seconds West (N 89° 11' 45" W) six hundred fifty-five and fifty-three hundredths feet (655.53) to an iron pipe on line of Charles Chilcote; thence along lands of Charles Chilcote, North two degrees, twenty-one minutes, fifteen seconds East (N 2° 21' 15" E) five hundred forty-four and sixty-five hundredths feet (544.65) to an iron pipe and the Southwest corner of Ann Rothrock; thence along lands of Ann Rothrock, South eighty-eight degrees, fifty-five minutes, thirty-five seconds East (S 88° 55' 35" E) seven hundred seventy-three and ninety-three hundredths feet (773.93) to an iron pipe and the Northwest corner of George Ogden, thence along lands of George Ogden, South four degrees, twenty-four minutes East (S 4° 24' E) three hundred feet (300.0) to an iron pipe and place of beginning.

CONTAINING 9.08 acres and being part of the same premises that were conveyed to Samuel and Marion Dixon and recorded in Clearfield County in deed book 404, page 310. The said Marion Dixon having predeceased her husband, the hereinabove described premises became vested in Samuel Dixon as surviving tenant by the entireties. The said Samuel Dixon HAVING DIED ON February 1, 1987, and by his Last Will and Testament, dated January 26, 1984, and duly entered by probate in the Office of the Register of Wills of Clearfield County, Pennsylvania, in file No. 87-49, at Will Book Volume 56, page 480, did give, devise and bequeath his real estate, including the herein described premises to Samuel K. Dixon and Janice M. Parks, the Grantors Herein.

Excepting and reserving all exceptions and reservations as contained in prior deeds.

BEING the same premises which Samuel K. Dixon and Janice M. Parks, individually and as co-executors of the Estate of Samuel K. Dixon, deceased, by Deed dated October 2, 1987 and recorded in Clearfield County on October 30, 1987 at Deed Book 1190 Page 433 granted and conveyed to Samuel K. Dixon.

WELTMAN, WEINBERG & REIS, CO., L.P.A.



---

Kimberly J. Hong, Esquire  
Attorney for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, Pennsylvania 15219

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

C&G SAVINGS BANK, assignee of  
FAMILYMOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250-CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

TYPE OF PLEADING:

**LIENHOLDER AFFIDAVIT OF SERVICE**

Filed on Behalf of:

Plaintiff

Counsel or Record for this Party:

Kimberly J. Hong  
PA I.D. #74950

Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
WWR #02663143

**FILED**

OCT 27 2003

William A. Shaw  
Prothonotary/Clerk of Courts

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

C&G SAVINGS BANK, assignee of  
FAMILYMOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250-CD

vs.

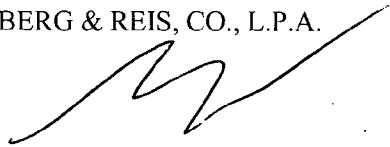
UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

**LIENHOLDER AFFIDAVIT OF SERVICE**

BEFORE ME, the undersigned authority, personally appeared Kimberly J. Hong, Esquire, who according to law deposes and says that a copy of the Notice of Sheriff's Sale has been served on each of the following Lienholders by Certificate of Mail on September 12, 2003. True and correct copies of said certificates of mail are attached hereto as Exhibit "A".

WELTMAN, WEINBERG & REIS, CO., L.P.A.



---

Kimberly J. Hong  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, Pennsylvania 15219

Sworn to and subscribed before me  
This 18<sup>th</sup> day of October, 2003.

Angela M. Schofield  
Notary Public

NOTARIAL SEAL
ANGELA M. SCHOFIELD, NOTARY PUBLIC
CITY OF PITTSBURGH, ALLEGHENY COUNTY
MY COMMISSION EXPIRES MARCH 8, 2006

PS Form 3817, January 2001 *Dixon*

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER			
Received From: <b>U.S. AIR MAIL</b> 2718 Koppers Bldg. 436 7th Avenue PITTSBURGH, PA 15219			
PITTSBURGH, PA 15219			
U.S. AIR MAIL			

PS Form 3817, January 2001 *Dixon*

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PITTSBURGH, PA 15219			
U.S. AIR MAIL			

PS Form 3817, January 2001 *Dixon*

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER			
Received From: <b>U.S. AIR MAIL</b> 2718 Koppers Bldg. 436 7th Avenue PITTSBURGH, PA 15219			
PITTSBURGH, PA 15219			
U.S. AIR MAIL			

One piece of ordinary mail addressed to:  
*International Relations  
220 E Market Street  
Campfield, PA 16830*

**PITTSBURGH, PA GRANT ST. SEP 17 2003**

PS Form 3817, January 2001 *Dixon*

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER			
Received From: <b>U.S. AIR MAIL</b> 2718 Koppers Bldg. 436 7th Avenue PITTSBURGH, PA 15219			
PITTSBURGH, PA 15219			
U.S. AIR MAIL			

One piece of ordinary mail addressed to:  
*International Trade Bureau  
220 E Market Street  
Campfield, PA 16830*

**PITTSBURGH, PA GRANT ST. SEP 12 2003**

PS Form 3817, January 2001 *Dixon*

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER			
Received From: <b>U.S. AIR MAIL</b> 2718 Koppers Bldg. 436 7th Avenue PITTSBURGH, PA 15219			
PITTSBURGH, PA 15219			
U.S. AIR MAIL			

One piece of ordinary mail addressed to:  
*Keystone Credit  
P.O. Box 686  
Lock Haven, PA 17745*

**PITTSBURGH, PA GRANT ST. SEP 12 2003**



A

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

C&G SAVINGS BANK, assignee of  
FAMILYMOBILE HOMES, INC.,

Plaintiff,  
vs.  
NO: 02-1250-CD

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

TYPE OF PLEADING:

DEFENDANT AFFIDAVIT OF SERVICE

Filed on Behalf of:

Plaintiff

Counsel or Record for this Party:

Kimberly J. Hong  
PA I.D. #74950

Weltman, Weinberg & Reis Co., L.P.A.  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh, PA 15219  
WWR #02663143

**FILED**

**OCT 27 2003**

William A. Shaw  
Prothonotary/Clerk of Courts

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

C&G SAVINGS BANK, assignee of  
FAMILYMOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250-CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

AFFIDAVIT OF SERVICE

BEFORE ME, the undersigned authority, personally appeared Kimberly J. Hong, Esquire, who according to law deposes and says that a copy of the Notice of Sheriff's Sale has been served on the Defendant, UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE AND INTEREST FROM OR UNDER Samuel K. Dixon, Jr.

1. On or about August 30, 2001, Plaintiff received a signed Order of Court, permitting Plaintiff to serve Defendant with the Notice of Sheriff's Sale. Service will be complete and valid upon posting of the property and by publication in one legal journal and one general circulation paper. Said order of court is attached as Exhibit "A".

2. On or about September 12, 2003, Plaintiff published a copy of the Notice in the Clearfield County Legal Journal. Said Proof of Publication is attached as Exhibit "B".

3. On or about September 19, 2003, Plaintiff published a copy of the Notice in the Courier Express. Said Proof of Publication is attached as Exhibit "B".

4. On or about September 2, 2003, Clearfield County Sheriff, posted the property located at RD 1, Box 494, Morrisdale, PA 16858, with the Notice of Sheriff's Sale.



Kimberly J. Hong  
Attorneys for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219

Sworn to and subscribed before me  
This 18th day of October, 2003

Angela M. Schofield  
Notary Public

NOTARIAL SEAL

ANGELA M. SCHOFIELD, NOTARY PUBLIC  
CITY OF PITTSBURGH, ALLEGHENY COUNTY  
MY COMMISSION EXPIRES MARCH 8, 2006

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,  
v.

NO: 02-1250-CJ

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

ORDER OF COURT

AND NOW, to wit, this 30<sup>th</sup> day of August, 2001, upon consideration  
of the within Motion for Special Service of the Complaint in Mortgage Foreclosure Pursuant to  
Special Order of Court, it is hereby ORDERED, ADJUDGED and DECREED that the Plaintiff is  
permitted to serve Defendant, Unknown Heirs, Successors, Assigns, and all persons, firms, or  
associations claiming right title and interest from or under Samuel K. Dixon, deceased, by  
directing the Sheriff of Clearfield County to post the property at RD1, Box 494, Morrisdale, PA  
16858, and by publication pursuant to Pa. R.C.P. Rule 430 (b) (2) in one legal journal and one  
newspaper of general circulation. Service of the Complaint shall be deemed complete and valid  
upon mailing and publication by the Plaintiff and by posting by the Sheriff.

BY THE COURT:

/s/ JOHN K. REILLY, JR.

J.

STATE: I certify this to be a true  
copy of the original  
on this day of this case.

AUG 30 2002

Attest:

John K. Reilly  
Prothonotary

## PROOF OF PUBLICATION

STATE OF PENNSYLVANIA : :

COUNTY OF CLEARFIELD : :

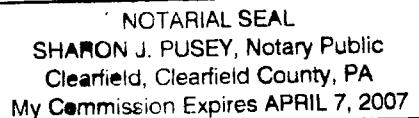
On this 12th day of September AD 2003, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement published in said publication in the regular issues of Week of September 12, 2003, No. 37. And that all of the allegations of this statement as to the time, place, and character of the publication are true.



Gary A. Knaresboro, Esquire  
Editor

Sworn and subscribed to before me the day and year aforesaid.

Sharon J. Pusey  
Notary Public  
My Commission Expires



Kimberly J Hong Esquire  
2718 Koppers Building  
436 7<sup>th</sup> Avenue  
Pittsburgh PA 15219

B



In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13796

C & G SAVINGS BANK ASSIGNEE OF FAMILY MOBILE HOMES, INC. 02-1250-CD

VS.

SAMUEL K. DIXON, DECEASED UNKNOWN HEIRS, SUCCESSORS, ASSIG

WRIT OF EXECUTION REAL ESTATE

**SHERIFF RETURNS**

---

NOW, APRIL 14, 2003 RETURNED WRIT OF EXECUTION AND ADVANCE CHECKS TO ATTORNEY KIMBERLY HONG AT HER REQUEST.

NOW, SEPTEMBER 2, 2003 @ 11:30 A.M. O'CLOCK A LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDANT. THE PROPERTY WAS ALSO POSTED THIS DATE AND TIME.

A SALE DATE OF NOVEMBER 7, 2003 WAS SET.

NOW, SEPTEMBER 2, 2003 SAMUEL K. DIXON, DECEASED DEFENDANT WAS SERVED BY COURT ORDER DATED AUGUST 30, 2002, STATING TO SERVE THE DEFENDANT BY POSTING THE PROPERTY AND ADVERTISING IN ONE LEGAL JOURNAL AND ONE NEWSPAPER OF GENERAL CIRCULATION. THE PROPERTY WAS ADVERTISED IN THE PROGRESS AND THE CLEARFIELD COUNTY LEGAL JOURNAL

NOW, NOVEMBER 7, 2003 A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANT

THE PROPERTY WAS PURCHASED BY MICHAEL HOWE, 1101 EDWARD STREET, PHILIPSBURG, PA 16866. HE MADE A DEPOSIT OF \$1,700.00 ON NOV. 7, 2003 CHECK #0102.

THE BALANCE WAS BILLED TO MICHAEL HOWE ON NOVEMBER 17, 2003. THE BALANCE OF 17, 507.53 WAS PAID ON NOVEMBER 21, 2003 CNB CK #239860.

013:47:01  
12/2003  
KED

12/2003  
KED

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13796

C & G SAVINGS BANK ASSIGNEE OF FAMILY MOBILE HOMES, INC. 02-1250-CD

VS.

SAMUEL K. DIXON, DECEASED UNKNOWN HEIRS, SUCCESSORS, ASSIG

WRIT OF EXECUTION REAL ESTATE

**SHERIFF RETURNS**

---

NOW, DECEMBER 30, 2003 PAID 2003 TAX COLLECTOR THE 2003 TAXES DUE.

NOW, JANUARY 12, 2004 PAID ALL THE COSTS FOR THE SHERIFF SALE, AND THE DEBIT OWED THE PLAINTIFF.

NOW, JANUARY 12, 2004 RETURN WRIT AS A SALE BEING HELD ON THE PROPERTY OF THE DEFENDANT, SAMUEL K. DIXON, DECEASED. THE PROPERTY WAS PURCHASED BY MICHAEL HOWE FOR \$17, 000.00 + COSTS.

NOW, JANUARY 12, 2004 A DEED WAS FILED

SHERIFF HAWKINS \$533.30  
SURCHARGE \$20.00  
PAID BY ATTORNEY

---

Return Costs

Cost	Description
0.00	NO COSTS RETURNED TO ATTORNEY

Sworn to Before Me This

12<sup>th</sup> Day Of January 2004  
William A. Shaw

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

So Answers,

Chester A. Hawkins  
By: Cynthia Beller-Auerbach  
Chester A. Hawkins  
Sheriff

**WRIT OF EXECUTION and/or ATTACHMENT  
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD  
CIVIL ACTION – LAW**

C&G Savings Bank, assignee of  
Family Mobile Homes, Inc.

Vs.

NO.: 2002-01250-CD

Unknown Heirs, Successors, Assigns,  
and all Persons, Firms or Associations  
claiming right, title and interest from  
or under Samuel K. Dixon, Deceased

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the debt, interest and costs due C&G SAVINGS BANK, assignee of Family Mobile Homes, Plaintiff(s) from Unknown Heirs, Successors, Assigns, and all Persons, Firms or Associations claiming right, title and interest from or under SAMUEL K. DIXON, deceased, Defendant(s):

(1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:  
See Attached Description

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:

Garnishee(s) as follows:

and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;

(3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE: **\$15,989.19**  
INTEREST at the rate of \$4.49 per  
diem from 6/10/03 thru sale date: **\$377.16**  
PROTH. COSTS: \$  
ATTY'S COMM: \$  
DATE: 07/23/2003

PAID: **\$195.00**  
SHERIFF: \$  
LATE CHARGES thru sale date: **\$75.16**  
OTHER COSTS: \$



William A. Shaw  
Prothonotary/Clerk Civil Division

Received this writ this 23rd day  
of July A.D. 2003  
At 3:00 A.M./P.M.

Requesting Party: Kimberly J. Hong  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, PA 15219

Chosten A. Hawkins  
Sheriff by Cynthia Butler Augenstein

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250 CD

vs.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant.

LONG FORM DESCRIPTION

ALL that certain piece or parcel of land situated in the Township of Graham, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING at an iron pipe which is the common corner of George Ogden, Norman A. and Janice M. Parks and the property to be described for Grantee; thence along lands of Norman A. and Janice M. Parks, North eighty-eight degrees, forty-two minutes West (N 88° 42' W) one hundred sixty and thirty-nine hundredths feet (160.39) to an iron pipe, thence still along lands of Norman A. and Janice M. Parks, South no degrees, forty-eight minutes, fifteen seconds East (S 0° 48' 15" E) two hundred forty-three and twenty-seven hundredths feet (243.27) to an iron pipe and the Northeast corner of James J. Boron, thence along lands of James J. Boron, North eighty-nine degrees, eleven minutes, forty-five seconds West (N 89° 11' 45" W) six hundred fifty-five and fifty-three hundredths feet (655.53) to an iron pipe on line of Charles Chilcote; thence along lands of Charles Chilcote, North two degrees, twenty-one minutes, fifteen seconds East (N 2° 21' 15" E) five hundred forty-four and sixty-five hundredths feet (544.65) to an iron pipe and the Southwest corner of Ann Rothrock; thence along lands of Ann Rothrock, South eighty-eight degrees, fifty-five minutes, thirty-five seconds East (S 88° 55' 35" E) seven hundred seventy-three and ninety-three hundredths feet (773.93) to an iron pipe and the Northwest corner of George Ogden, thence along lands of George Ogden, South four degrees, twenty-four minutes East (S 4° 24' E) three hundred feet (300.0) to an iron pipe and place of beginning.

CONTAINING 9.08 acres and being part of the same premises that were conveyed to Samuel and Marion Dixon and recorded in Clearfield County in deed book 404, page 310. The said Marion Dixon having predeceased her husband, the hereinabove described premises became vested in Samuel Dixon as surviving tenant by the entireties. The said Samuel Dixon HAVING DIED ON February 1, 1987, and by his Last Will and Testament, dated January 26, 1984, and duly entered by probate in the Office of the Register of Wills of Clearfield County, Pennsylvania, in file No. 87-49, at Will Book Volume 56, page 480, did give, devise and bequeath his real estate, including the herein described premises to Samuel K. Dixon and Janice M. Parks, the Grantors Herein.

Excepting and reserving all exceptions and reservations as contained in prior deeds.

BEING the same premises which Samuel K. Dixon and Janice M. Parks, individually and as co-executors of the Estate of Samuel K. Dixon, deceased, by Deed dated October 2, 1987 and recorded in Clearfield County on October 30, 1987 at Deed Book 1190 Page 433 granted and conveyed to Samuel K. Dixon.

WELTMAN, WEINBERG & REIS, CO., L.P.A.



---

Kimberly J. Hong, Esquire  
Attorney for Plaintiff  
2718 Koppers Building  
436 Seventh Avenue  
Pittsburgh, Pennsylvania 15219

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME DIXON NO. 02-1250-CD

NOW, November 7, 2003, 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 7TH day of NOVEMBER 2003, I exposed the within described real estate of SAMUEL K. DIXON, DECEASED UNKNOWN HEIRS, SUCCESSORS, ASSIGNS to public venue or outcry at which time and place I sold the same to MICHAEL HOWE 1101 EDWARD STREET PHILIPSBURG, PA 16866 he/she being the highest bidder, for the sum of \$17,000.00 + COSTS and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	15.00
SERVICE	15.00
MILEAGE	
LEVY	15.00
MILEAGE	9.36
POSTING	15.00
CSDS	10.00
COMMISSION 2%	340.00
POSTAGE	4.44
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	17,000.00
RETURNS/DEPUTIZE	
COPIES/BILLING	15.00
	4.50
BILLING/PHONE/FAX	5.00
<b>TOTAL SHERIFF COSTS</b>	<b>533.30</b>
<b>DEED COSTS:</b>	
ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	31.50 * 6/N
TRANSFER TAX 2%	340.00
<b>TOTAL DEED COSTS</b>	<b>371.50</b>

**PLAINTIFF COSTS, DEBT & INTEREST:**

DEBT-AMOUNT DUE	15,989.19
INTEREST	377.16
TO BE ADDED	TO SALE DATE
ATTORNEY FEES	
PROTH. SATISFACTION	
LATE CHARGES & FEES	75.16
COST OF SUIT -TO BE ADDED	
FORECLOSURE FEES/ESCROW DEFICIT	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	
SATISFACTION FEE	
ESCROW DEFICIENCY	
<b>TOTAL DEBT &amp; INTEREST</b>	<b>16,441.51</b>
<b>COSTS:</b>	
ADVERTISING	502.74
TAXES - collector	264.99
TAXES - tax claim	NONE
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	371.50
SHERIFF COSTS	533.30
LEGAL JOURNAL AD	195.00
PROTHONOTARY	195.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
<b>TOTAL COSTS</b>	<b>2,207.53</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

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

C&G SAVINGS BANK, assignee of  
FAMILY MOBILE HOMES, INC.,

Plaintiff,

NO: 02-1250-CJ

v.

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE AND  
INTEREST FROM OR UNDER  
SAMUEL K. DIXON, deceased,

Defendant

ORDER OF COURT

AND NOW, to wit, this 30<sup>th</sup> day of August, 2001, upon consideration  
of the within Motion for Special Service of the Complaint in Mortgage Foreclosure Pursuant to  
Special Order of Court, it is hereby ORDERED, ADJUDGED and DECREED that the Plaintiff is  
permitted to serve Defendant, Unknown Heirs, Successors, Assigns, and all persons, firms, or  
associations claiming right title and interest from or under Samuel K. Dixon, deceased, by  
directing the Sheriff of Clearfield County to post the property at RD1, Box 494, Morrisdale, PA  
16858, and by publication pursuant to Pa. R.C.P. Rule 430 (b) (2) in one legal journal and one  
newspaper of general circulation. Service of the Complaint shall be deemed complete and valid  
upon mailing and publication by the Plaintiff and by posting by the Sheriff.

BY THE COURT:

/s/ JOHN K. REILLY, JR.

J.

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

AUG 30 2002

Attest:

William E.  
Prothonotary