

02-1322-CD  
CIT GROUP/CONSUMER FINANCE, INC. -vs- SHARON L. PICARD et al

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95th Street  
Prairie Village, KS 66207

Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Media, PA 16661

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION

Clearfield County

NO. 02-1322-C8

COMPLAINT IN MORTGAGE FORECLOSURE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYERS REFERRAL SERVICE  
David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext 5982

FILED

AUG 26 2002

William A. Shaw  
Prothonotary

### **AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

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

**David S. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext 5982**

## **NOTICE**

**The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.**

**If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.**

**This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.**

**LAW OFFICES OF MARK J. UDREN  
/s/ Mark J. Udren, Esquire  
1040 N. Kings Highway, Suite 500  
Cherry Hill, NJ 08034  
(856) 482-6900**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: N/A

Assignments of Record to: N/A

Recording Date: N/A

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: RD 2 Box 184

MUNICIPALITY/TOWNSHIP/BOROUGH: Township of Girard

COUNTY: Clearfield

DATE EXECUTED: 6/30/98

DATE RECORDED: 7/7/98 BOOK: 1948 PAGE: 262

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

- (a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated below;
- (b) by failing or refusing to pay other charges, if any, indicated below.

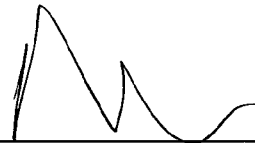
6. The following amounts are due on the said Mortgage as of 6/25/02:

Principal of debt due and unpaid	\$48,136.38
Interest at 9.90% from 9/6/01 to 6/25/02 (the per diem interest accruing on this debt is \$ 13.06 and that sum should be added each day after 6/25/02)	5,105.25
Title Report	250.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$0.00 should be added in accordance with the terms of the note each month after 6/25/02)	0.00
Rx Due	1,730.00
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,406.82</u>
TOTAL	\$57,908.45

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$57,908.45 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



---

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

All that certain tract or parcel of land situate in the Township of Girard,  
County of Clearfield and Commonwealth of Pennsylvania, bounded and described as  
follows:

BEGINNING at a maple on the public road; thence along an alley North  
sixty-three degrees nineteen minutes East (N 63 degrees 19' E) one hundred  
(100') feet; thence North thirty-one degrees twenty-eight minutes West (N 31  
degrees 28' W) sixty-four (64') feet to an old road and land of the Surveyor  
Run Lumber Company; thence by the same South sixty-six degrees forty-two  
minutes East (S 66 degrees 42' E) forty-eight (48') feet; thence by the same  
South forty-four degrees forty-six minutes East (S 44 degrees 46' E) two  
hundred sixteen (216') feet to a locust; thence by land now or formerly of W.L.  
Gaines South seventy-one degrees thirty-six minutes West (S 71 degrees 36' W)  
one hundred eighty-seven (187') feet to the public road; thence by the same  
North thirty-three degrees fifty minutes West (N 33 degrees 50' W) one hundred  
sixty-seven (167') feet to the maple and place of beginning.





July 18, 2002

# **ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE**

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

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

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

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

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

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

HOMEOWNER'S NAME(S):	Sharon L. Picard Kenneth C. Picard
PROPERTY ADDRESS:	RD2 Box 184 Clearfield PA 16830
LOAN ACCT. NO.:	26979278
ORIGINAL LENDER:	The CIT Group/Consumer Finance, Inc.
CURRENT LENDER:	The CIT Group/Consumer Finance, Inc.

## HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM

### **YOU MAY BE ELIGIBLE FOR FINANCIAL ASSISTANCE WHICH CAN SAVE YOUR HOME FROM FORECLOSURE AND HELP YOU MAKE FUTURE MORTGAGE PAYMENTS**

IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:

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

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

**CONSUMER CREDIT COUNSELING AGENCIES** -- If you meet with one of the consumer credit counseling agencies listed at the end of this notice, the lender may NOT take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face-to-face meeting. Advise your lender immediately of your intentions.

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

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

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

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

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

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

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

**RD2 Box 184  
Clearfield PA 16830**

IS SERIOUSLY IN DEFAULT because:

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

**Monthly Payments of \$422.60 for October 6, 2001 through July 6, 2002 = \$4226.00**

**Monthly Late Charges of \$0.00 for October 6, 2001 through July 6, 2002 = \$0.00**

**Other charges (explain/itemize):**

**TOTAL AMOUNT PAST DUE:** **\$4226.00**

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

**HOW TO CURE THE DEFAULT** -- You may cure the default within THIRTY (30) DAYS of the date of this notice **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS \$4226.00, PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD.** Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:

**Mark J. Udren & Associates  
1040 N. Kings Highway, Suite 500  
Cherry Hill, NJ 08034**

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.): **N/A**

**IF YOU DO NOT CURE THE DEFAULT** -- If you do not cure the default within THIRTY (30) DAYS of the date of this Notice, **the lender intends to exercise its rights to accelerate the mortgage debt.** This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not

made within THIRTY (30) DAYS, the lender also intends to instruct its attorneys to start legal action to **foreclose upon your mortgaged property.**

**IF THE MORTGAGE IS FORECLOSED UPON** -- The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. **If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.**

**OTHER LENDER REMEDIES** -- The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage. If your debt has been discharged in bankruptcy without your having reaffirmed it, then lender cannot pursue this remedy.

**RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE** -- If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, **you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the total amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. Curing your default in the manner set forth in this notice will restore your mortgage to the same position as if you had never defaulted.**

**EARLIEST POSSIBLE SHERIFF'S SALE DATE** -- It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be **approximately 6 months from the date of this Notice.** A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

**HOW TO CONTACT THE LENDER:**

Name of Lender/Service:

The CIT Group

Address:

715 South Metropolitan Ave.

Suite 150

Oklahoma OK 73108

Phone Number:

(800) 621-1437

Fax Number:

N/A

Contact Person:

Michelle Strain

**EFFECT OF SHERIFF'S SALE** -- You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishings and other belongings could be started by the lender at any time.

**ASSUMPTION OF MORTGAGE** -- You may not transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

## **NOTICE**

**The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.**

**If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.**

**This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.**

**LAW OFFICES OF MARK J. UDREN  
/s/ Mark J. Udren, Esquire  
1040 N. Kings Highway, Suite 500  
Cherry Hill, NJ 08034  
(856) 482-6900**

**YOU MAY ALSO HAVE THE RIGHT:**

- TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS,
- TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

---

**CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY**

**CLEARFIELD COUNTY**

Keystone Economic Development Corporation  
1954 Mary Grace Lane  
Johnstown, PA 15901  
(814) 535-6556  
FAX (814) 539-1688

Indiana Co. Community Action Program  
827 Water Street, Box 187  
Indiana, PA 15701  
(724) 465-2657  
FAX (412) 465-5118

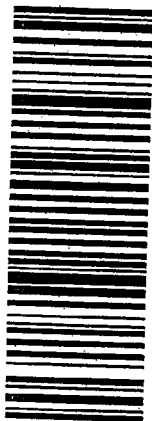
CCCS of Western Pennsylvania, Inc.  
217 E. Plank Road  
Altoona PA 16602  
(814) 944-8100  
FAX (814) 944-5747

CCCS of Northeastern PA  
1631 S Atherton St., Suite 100  
State College, PA 16801  
(814) 238-3668  
FAX (814) 238-3669

CCCS of Western PA  
219-A College Park Plaza  
Johnstown PA 15904  
(814) 539-6335  
FAX n/a

CERTIFIED MAIL

LAW OFFICES  
MARK J. UDREN & ASSOCIATES  
1040 N. KINGS HIGHWAY  
SUITE 500  
CHERRY HILL, NJ 08034



7002 0460 0000 1857 0286  
7002 0460 0000 1857 0286



U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

**OFFICIAL USE**

Postage	\$ 4.65
Certified Fee	2.30
Return Receipt Fee (Endorsement Required)	1.75
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 8.70

Postmark  
Here

Sent To Kenneth C. Picard  
Street, Apt. No.,  
or PO Box No. RD 2 Box 184  
City, State, ZIP+4 Clearfield, PA 16830

PS Form 3800, January 2001

See Reverse for Instructions

*Picard*  
*Box 184*  
*PA 16830*

02336982

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

*Kenneth C. Picard  
Rb 2 Box 184  
Clearfield, PA 16830*

2. Article Number

(Transfer from service label)

PS Form 3811, August 2001

7002 0460 0000 1857 0286

Domestic Return Receipt

102595-02-M-0835

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature ☒ Agent  
☒ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail  
☒ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

ars

all or Priority Mail.  
mail.

ertified Mail. For

to provide proof of  
and attach a Return  
postage to cover the  
give a fee waiver for  
ified Mail receipt is

the addressee or  
mailpiece with the

se present the arti-  
the Certified Mail  
and mail.

king an inquiry.

02595-M-02-0451



LAW OFFICES  
MARK J. UDREN & ASSOCIATES  
1040 N. KINGS HIGHWAY  
SUITE 500  
CHERRY HILL, NJ 08034



7002 0460 0000 1857 0293  
7002 0460 0000 1857 0293



U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

**OFFICIAL USE**

Postage	\$ 50
Certified Fee	2.30
Return Receipt Fee (Endorsement Required)	1.75
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 465

Postmark  
Here

Sent To Kenneth C. Picard  
Street, Apt. No.,  
or PO Box No. P.O. Box 242  
City, State, ZIP+ 4 Madera, PA 16661

PS Form 3800, January 2001

See Reverse for Instructions

0233698

card  
16661

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

*Kenneth C. Picard  
P.O. Box 242  
Madera, PA 16661*

2. Article Number  
(Transfer from service label)

7002 0460 0000 1857 0293

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-0895

**COMPLETE THIS SECTION ON DELIVERY**

- A. Signature ☒ Agent ☐ Addressee
- B. Received by (Printed Name) C. Date of Delivery
- D. Is delivery address different from item 1? ☐ Yes ☐ No  
If YES, enter delivery address below:

3. Service Type
- ☒ Certified Mail ☐ Express Mail
- ☒ Registered ☐ Return Receipt for Merchandise
- ☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes

or Priority Mail.  
mail.  
Certified Mail. For  
to provide proof of  
nd attach a Return  
stage to cover the  
ve a fee waiver for  
ed Mail receipt is  
he addressee or  
mailpiece with the  
e present the arti-  
the Certified Mail  
nd mail.  
ng an inquiry.  
2595-M-02-0451

LAW OFFICES  
 MARK J. UDREN & ASSOCIATES  
 1040 N. KINGS HIGHWAY  
 SUITE 500  
 CHERRY HILL, NJ 08034



7002 0460 0000 1857 0330  
 7002 0460 0000 1857 0330



*Picard*  
*242*  
*PA 16661*

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
 (Domestic Mail Only: No Insurance Coverage Provided)

**OFFICIAL USE**

Postage	\$ <i>69</i>	Postmark Here
Certified Fee*	<i>230</i>	
Return Receipt Fee (Endorsement Required)	<i>1.75</i>	
Restricted Delivery Fee (Endorsement Required)		
<b>Total Postage &amp; Fees</b>	<b>\$ <i>465</i></b>	
Sent To <i>Sharon L. Picard</i>		
Street, Apt. No., or PO Box No. <i>P.O. Box 242</i>		
City, State, ZIP+4 <i>Madera, PA 16661</i>		

PS Form 3800, January 2001

See Reverse for Instructions

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

*Sharon L. Picard  
P.O. Box 242  
Madera, PA 16661*

2. Article Number  
(Transfer from service label)

7002 0460 0000 1857 0330

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-0835

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature ☒ Agent  
☒ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type ☒ Certified Mail ☐ Express Mail  
☒ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.  
4. Restricted Delivery? (Extra Fee) ☐ Yes

rs

all or Priority Mail.  
mail.  
Certified Mail. For

to provide proof of  
and attach a Return  
postage to cover the  
ive a fee waiver for  
fied Mail receipt is

the addressee or  
mailpiece with the

se present the arti-  
the Certified Mail  
and mail.

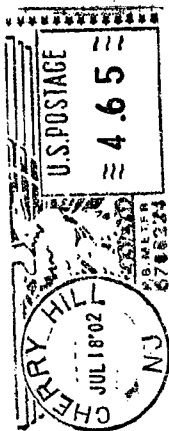
ing an inquiry.

02595-M-02-0451

LAW OFFICES  
MARK J. UDREN & ASSOCIATES  
1040 N. KINGS HIGHWAY  
SUITE 500  
CHERRY HILL, NJ 08034



7002 0460 0000 1857 0309  
7002 0460 0000 1857 0309



*Picard*  
*184*  
*PA 16830*

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

**OFFICIAL USE**

Postage	\$ <i>0.60</i>	Postmark Here
Certified Fee	<i>2.30</i>	
Return Receipt Fee (Endorsement Required)	<i>1.55</i>	
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ <i>4.45</i>	

Sent To *Sharon L. Picard*  
Street, Apt. No.,  
or PO Box No. *RD2 Box 184*  
City, State, ZIP+4 *Clearfield, PA 16830*

PS Form 3800, January 2001

See Reverse for Instructions

*6233688*

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Sharon L. Picard  
Rt 2 Box 184  
Clearfield, PA 16830

2. Article Number

(Transfer from service label)

7002 0460 0000 1857 0309

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-0835

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

☒ Agent  
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

ars

all or Priority Mail.  
mail.  
Certified Mail, For

to provide proof of  
and attach a Return  
postage to cover the  
give a fee waiver for  
fied Mail receipt is

the addressee or  
mailpiece with the

se present the arti-  
the Certified Mail  
and mail.

ing an inquiry.

02595-M-02-0451

V E R I F I C A T I O N

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation unless designated otherwise; that he is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.



---

Mark J. Udren, ESQUIRE  
MARK J. UDREN & ASSOCIATES

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
Plaintiff

: COURT OF COMMON PLEAS  
: CIVIL DIVISION  
: Clearfield County  
:

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
Defendant(s)

: NO. 02-1322-CD  
:  
:

PRAECIPE TO SUBSTITUTE VERIFICATION

TO THE PROTHONOTARY:

Kindly substitute the attached Verification for the  
Verification attached to the Complaint in Mortgage Foreclosure with  
regard to the captioned matter.

DATED: October 29, 2002

MARK J. UDREN & ASSOCIATES

BY: 

Mark J. Udren, Esquire  
Attorney for Plaintiff

FILED

NOV 04 2002

William A. Shaw  
Prothonotary




V E R I F I C A T I O N

The undersigned, an officer of the Corporation which is the Plaintiff in the foregoing Complaint or an officer of the Corporation which is the servicing agent of Plaintiff, and being authorized to make this verification on behalf of the Plaintiff, hereby verifies that the facts set forth in the foregoing Complaint are taken from records maintained by persons supervised by the undersigned who maintain the business records of the mortgage held by Plaintiff in the ordinary course of business and that those facts are true and correct to the best of the knowledge, information and belief of the undersigned.

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

Date: Sept 18, 2002

  
Name: \_\_\_\_\_  
Title: ROY STRINGFELLOW, V.P.  
Company: CIT GROUP / CONSUMER FINANCE, INC.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
Loan #26979278  
MJU #0233698

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207

Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 02-1322-CD

FILED

NOV 04 2002

PRAECIPE FOR JUDGMENT FOR FAILURE TO  
ANSWER AND ASSESSMENT OF DAMAGES

TO THE PROTHONOTARY:

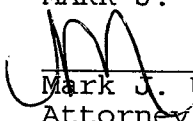
William A. Shaw  
Prothonotary

Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$57,908.45
Interest Per Complaint	1,645.56
From 6/26/02 to 10/29/02	
Late charges per Complaint	0.00
From 6/26/02 to 10/29/02	
Escrow payment per Complaint	0.00
From 6/26/02 to 10/29/02	
TOTAL	\$59,554.01

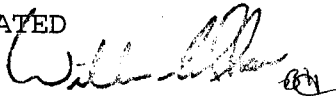
I hereby certify that (1) the addresses of the Plaintiff and Defendant are as shown above, and (2) that notice has been given in accordance with Rule 237.1, a copy of which is attached hereto.

MARK J. UDREN & ASSOCIATES

  
Mark J. Udren, ESQUIRE  
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: 11/4/02

  
PRO PROTHY

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer Finance, Inc.  
Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 02-1322-CD

DATED: October 15, 2002  
TO: Sharon L. Picard  
P.O. Box 242  
Madera, PA 16661

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. 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.

LAWYER REFERRAL SERVICE  
David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext 5982

**NOTIFICACION IMPORTANTE**

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUIRIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO INMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL  
LAWYER REFERRAL SERVICE  
David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext 5982

NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer Finance, Inc.  
Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 02-1322-CD

DATED: October 15, 2002  
TO: Kenneth C. Picard, Mortgagor  
RD  
Shawville, PA 16873

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. 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.

LAWYER REFERRAL SERVICE  
David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext 5982  
**NOTIFICACION IMPORTANTE**

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUIRIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO INMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL  
LAWYER REFERRAL SERVICE  
David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext 5982

NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

v.  
Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Media, PA 16661  
Defendant(s)

NO. 02-1322-CD

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF *Oklahoma* :  
COUNTY OF *Oklahoma* : SS

THE UNDERSIGNED being duly sworn, deposes and says that the averments herein are based upon investigations made and records maintained by us either as Plaintiff or as servicing agent of the Plaintiff herein and that the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended, and that the age and last known residence and employment of each Defendant are as follows:

Defendant: Sharon L. Picard  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

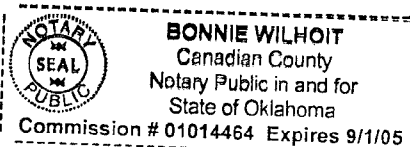
Defendant: Kenneth C. Picard, Mortgagor  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

Sworn to and subscribed  
before me this *18th* day  
of *September*, 2002

*Bonnie Wilhoit*  
Notary Public

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Company: **ROY STRINGFELLOW, V.P.**

**CIT GROUP / CONSUMER FINANCE, INC.**



FILED

Atty. Gen. 20.00

11/3/10 2011 Notice to each Def.  
NOV 04 2002 Statement to Atty. Gen.

William A. Shaw  
Prothonotary

*Wes*

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

COPY

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207

Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 02-1322-CD

TO: Sharon L. Picard  
P.O. Box 242  
Madera, PA 16661

#### NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

*Prothonotary*

- ☒ Judgment by Default
- ☐ Money Judgment
- ☐ Judgment in Replevin
- ☐ Judgment for Possession
- ☐ Judgment on Award of Arbitration
- ☐ Judgment on Verdict
- ☐ Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-482-6900

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207

Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 02-1322-CD

**PRAECIPE FOR JUDGMENT FOR FAILURE TO  
ANSWER AND ASSESSMENT OF DAMAGES**


TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$57,908.45
Interest Per Complaint	1,645.56
From 6/26/02 to 10/29/02	
Late charges per Complaint	0.00
From 6/26/02 to 10/29/02	
Escrow payment per Complaint	0.00
From 6/26/02 to 10/29/02	
TOTAL	\$59,554.01

I hereby certify that (1) the addresses of the Plaintiff and Defendant are as shown above, and (2) that notice has been given in accordance with Rule 237.1, a copy of which is attached hereto.

MARK J. UDREN & ASSOCIATES

  
Mark J. Udren, ESQUIRE  
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: 11/4/02

  
PRO PROTHY



MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

COPY

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207

Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 02-1322-CD

TO: Kenneth C. Picard, Mortgagor  
RD  
Shawville, PA 16873

#### NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

*Prothonotary*

- ☒ Judgment by Default  
☐ Money Judgment  
☐ Judgment in Replevin  
☐ Judgment for Possession  
☐ Judgment on Award of Arbitration  
☐ Judgment on Verdict  
☐ Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-482-6900

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207

Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 02-1322-CD

**PRAECIPE FOR JUDGMENT FOR FAILURE TO  
ANSWER AND ASSESSMENT OF DAMAGES**


TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$57,908.45
Interest Per Complaint	1,645.56
From 6/26/02 to 10/29/02	
Late charges per Complaint	0.00
From 6/26/02 to 10/29/02	
Escrow payment per Complaint	0.00
From 6/26/02 to 10/29/02	
<b>TOTAL</b>	<b>\$59,554.01</b>

I hereby certify that (1) the addresses of the Plaintiff and Defendant are as shown above, and (2) that notice has been given in accordance with Rule 237.1, a copy of which is attached hereto.

MARK J. UDREN & ASSOCIATES

  
Mark J. Udren, ESQUIRE  
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: 11/4/02

  
PRO PROTHY

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

COPY

CIT Group/Consumer Finance, Inc.  
Plaintiff(s)

No.: 2002-01322-CD

Real Debt: \$59,554.01

Atty's Comm:

Vs.

Costs: \$

Int. From:

Sharon L. Picard  
Kenneth C. Picard  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: November 4, 2002

Expires: November 4, 2007

Certified from the record this 4th day of November, 2002

\_\_\_\_\_  
William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

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

\_\_\_\_\_  
Plaintiff/Attorney

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207

Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 02-1322-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE SHERIFF:

Issue Writ of Execution in the above matter:

Amount due

\$59,554.01


Interest From 10/30/02  
to Date of Sale  
Per diem @\$13.06

(Costs to be added)

Prothonotary costs  
\$

120.00

MARK J. UDREN & ASSOCIATES

  
Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

FILED

NOV 04 2002

William A. Shaw  
Prothonotary

FILED

Atty. Under  
pd. 20.00

m 1333 Bell  
NOV 04 2002

1 cc @ Lewis w/prop. descr. attached  
to Shff

William A. Shaw  
Prothonotary

E  
~~RET~~

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

COPY

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207

Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 02-1322-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

To satisfy the judgment, interest and costs in the above matter, you  
are directed to levy upon and sell the following described property:

RD 2 Box 184  
Clearfield, PA 16830  
SEE LEGAL DESCRIPTION ATTACHED

Amount due

\$59,554.01

Interest From 10/30/02

to Date of Sale

Per diem @\$13.06

(Costs to be added)

Prothonotary costs

120.00

\$

Prothonotary

By

Clerk

Date November 4, 2002

COURT OF COMMON PLEAS  
NO. 02-1322-CD

=====

The CIT Group/Consumer Finance, Inc.  
vs.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 59,554.01

INTEREST \$ \_\_\_\_\_  
from 10/30/02 to \_\_\_\_\_  
Date of Sale  
Per diem @\$13.06

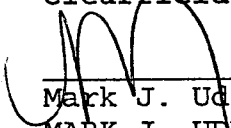
COSTS PAID:  
PROTHY \$ 120.00

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

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

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

PREMISES TO BE SOLD:  
RD 2 Box 184  
Clearfield, PA 16830

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

0  
1  
All that certain tract or parcel of land situate in the Township of Girard,  
County of Clearfield and Commonwealth of Pennsylvania, bounded and described as  
follows:

BEGINNING at a maple on the public road; thence along an alley North  
sixty-three degrees nineteen minutes East (N 63 degrees 19' E) one hundred  
(100') feet; thence North thirty-one degrees twenty-eight minutes West (N 31  
degrees 28' W) sixty-four (64') feet to an old road and land of the Surveyor  
Run Lumber Company; thence by the same South sixty-six degrees forty-two  
minutes East (S 66 degrees 42' E) forty-eight (48') feet; thence by the same  
South forty-four degrees forty-six minutes East (S 44 degrees 46' E) two  
hundred sixteen (216') feet to a locust; thence by land now or formerly of W.L.  
Gaines South seventy-one degrees thirty-six minutes West (S 71 degrees 36' W)  
one hundred eighty-seven (187') feet to the public road; thence by the same  
North thirty-three degrees fifty minutes West (N 33 degrees 50' W) one hundred  
sixty-seven (167') feet to the maple and place of beginning.

BEING KNOWN AS: RD 2 BOX 184, CLEARFIELD, PA 16830

TAX ID NO.: 114-N6-670-2

TITLE TO SAID PREMISES IS VESTED IN SHARON L. PICARD BY DEED FROM  
SHARON L. PICARD AND KENNETH C. PICARD, DATED 07/20/2001, RECORDED  
07/20/2001, IN DOCUMENT 200111289.



**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 12968

THE CIT GROUP/CONSUMER DISCOUNT

02-1322-CD

VS.

PICARD, SHARON L. & KENNETH C.

COMPLAINT IN MORTGAGE FORECLOSURE

**SHERIFF RETURNS**

NOW SEPTEMBER 4, 2002 AT 9:59 AM DST SERVED THE WITHIN COMPLAINT  
IN MORTGAGE FORECLOSURE ON SHARON L. PICARD, DEFENDANT AT  
RESIDENCE, PO BOX 242, MADERA, CLEARFIELD COUNTY, PENNSYLVANIA BY  
HANDING TO SHARON L. PICARD A TRUE AND ATTESTED COPY OF THE  
ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO  
HER THE CONTENTS THEREOF.  
SERVED BY: DAVIS/MORGILLO

NOW SEPTEMBER 4, 2002 AT 1:25 PM DST SERVED THE WITHIN COMPLAINT IN  
MORTGAGE FORECLOSURE ON KENNETH C. PICARD, DEFENDANT AT  
RESIDENCE, R.D. SHAWVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY  
HANDING TO LISA ROSS, GIRLFRIEND, ADULT AT RESIDENCE A TRUE AND  
ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE  
AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: DAVIS/MORGILLO

**Return Costs**

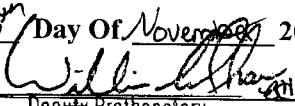
Cost	Description
41.55	SHFF. HAWKINS PAID BY; ATTY.
20.00	SURCHARGE PAID BY: ATTY.

**FILED**


01/3:08 AM  
NOV 13 2002 ERL

William A. Shaw  
Prothonotary

Sworn to Before Me This

13<sup>th</sup> Day Of November 2002  
  
Deputy Prothonotary  
My Commission Expires  
1st Monday in Jan. 2006  
Clearfield Co., Clearfield, PA

So Answers,

  
Chester A. Hawkins  
Sheriff

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire

ATTORNEY FOR PLAINTIFF

ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207

Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 02-1322-CD

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661

Defendant(s)

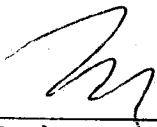
PRAECIPE TO FILE PROOF OF SERVICE

TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to the  
captioned matter.

MARK J. UDREN & ASSOCIATES

Date: February 11, 2003

BY:   
Mark J. Udren, ESQUIRE  
Attorney for Plaintiff

FILED

FEB 21 2003

William A. Shaw  
Prothonotary

The CIT Group/Consumer Finance, Inc., et. al, Plaintiff(s)  
vs.  
Sharon L. Picard, et. al., Defendant(s)



Service of Process by  
**APS International, Ltd.**  
**1-800-328-7171**  
APS International Plaza  
7800 Glenroy Rd.  
Minneapolis, MN 55439-3122

### AFFIDAVIT OF SERVICE -- Individual

MARK J. UDREN  
Ms. Jodie L. Boos  
1040 North Kings Highway  
Suite 500  
Cherry Hill, NJ 08034

Service of Process on:

--Sharon L. Picard  
Court Case No. 02-1322-CD

State of: Pennsylvania ss.  
County of: Blair

Name of Server: Thomas P. Chatham, undersigned, being duly sworn, deposes and says  
that at the time of service, s/he was over the age of twenty-one, was not a party to this action;

Date/Time of Service: that on the 10 day of February, 2003, at 6:02 o'clock PM

Place of Service: at RD 2, Box 184, city of Clearfield, state of PA

Documents Served: the undersigned served the documents described as:  
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:  
Sharon L. Picard

Person Served, and  
Method of Service: ☒ By personally delivering them into the hands of the person to be served.  
☐ By delivering them into the hands of \_\_\_\_\_, a person of  
suitable age and discretion residing at the Place of Service,  
whose relationship to the person to be served is \_\_\_\_\_

Description of Person  
Receiving Documents: The person receiving documents is described as follows:  
Sex F; Skin Color W; Hair Color Salt & Pepper; Facial Hair NO  
Approx. Age 53; Approx. Height 5'5"; Approx. Weight 140  
☒ To the best of my knowledge and belief, said person was not engaged in the US Military at  
the time of service.

Signature of Server: Undersigned declares under penalty of perjury  
that the foregoing is true and correct.

Subscribed and sworn to before me this

11th day of February, 2003

Signature of Server

(Date)

Notary Public

(Commission Expires)

**APS International, Ltd.**

APS File #: 058036-0001

Notarial Seal  
Monica Crilly, Notary Public  
City of Altoona, Blair County  
My Commission Expires Aug. 27, 2005

Member, Pennsylvania Association of Notaries

FILED

NO  
CC

M 11-23-04  
FEB 21 2003

William A. Shaw  
Prothonotary

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

FILED

MAR 20 2003

William A. Shaw  
Prothonotary

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661  
Defendant(s)

NO. 02-1322-CD

AMENDED AFFIDAVIT OF SERVICE PURSUANT TO Pa.R.C.P. RULE 3129.1

Plaintiff, by its/his/her Attorney, Mark J. Udren, Esquire, hereby verifies that:

1. A copy of the Notice of Sheriff's Sale, a true and correct copy of which is attached hereto as Exhibit "A", was sent to every recorded lienholder and every other interested party known as of the date of the filing of the Praecipe for the Writ of Execution, on the date(s) appearing on the attached Certificates of Mailing.

2. A Notice of Sheriff's Sale was sent to Defendant(s) by regular mail and certified mail on the date appearing on the attached Return Receipt, which was signed for by Defendant(s) on the date specified on the said Return Receipt. Copies of the said Notice and Return Receipt are attached hereto as Exhibit "B".

3. If a Return Receipt is not attached hereto, then service was by personal service on the date specified on the attached Return of Service, attached hereto as Exhibit "B".

4. If service was by Order of Court, then proof of compliance with said Order is attached hereto as Exhibit "B".

All Notices were served within the time limits set forth by Pa Rule C.P. 3129.

This Affidavit is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Dated: March 10, 2003

MARK J. UDREN & ASSOCIATES

BY:

Mark J. Udren, Esquire  
Attorney for Plaintiff

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661  
Defendant(s)

NO. 02-1322-CD

AMENDED AFFIDAVIT PURSUANT TO RULE 3129.1

The CIT Group/Consumer Finance, Inc., Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at: RD 2 Box 184 Clearfield, PA 16830

1. Name and address of Owner(s) or reputed Owner(s):  
Name Address

Sharon L. Picard RD #2, Box 184, Clearfield, PA 16830

2. Name and address of Defendant(s) in the judgment:  
Name Address

Kenneth C. Picard, Mortgagor Lingel Circle, Shawville, PA 16873

3. Name and address of every judgment creditor whose judgment is a record lien on the real property to be sold:  
Name Address

NONE

4. Name and address of the last recorded holder of every mortgage of record:  
Name Address

Associates CDC 3014 Pleasant Valley Blvd.  
Altoona, PA 16602

Beneficial Mortgage Co. 90 Beaver Drive, Suite 114 C  
d/b/a Beneficial Mortgage Co. Dubois, PA 15801

Plaintiff herein. See Caption above.

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

Name

Address

NONE

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

Name

Address

Real Estate Tax Department

1 North Second Street, Suite 116  
Clearfield, PA 16830

Domestic Relations Section

1 North Second Street, Suite 116  
Clearfield, PA 16830

Commonwealth of PA,  
Department of Revenue

Bureau of Compliance, Dept. 280946  
Harrisburg, PA 17128-0946

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

Name

Address

Tenants/Occupants

RD 2 Box 184, Clearfield, PA 16830

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

MARK J. UDREN & ASSOCIATES

DATED: March 10, 2003

Mark J. Udren, Esquire  
Attorney for Plaintiff

MARK J. UDREN & ASSOCIATES

ATTORNEY FOR PLAINTIFF

BY: Mark J. Udren, Esquire

ATTY I.D. NO. 04302

1040 N. KINGS HIGHWAY, SUITE 500

CHERRY HILL, NJ 08034

856-482-6900

The CIT Group/Consumer  
Finance, Inc.

5370 W. 95 Street

Prairie Village, KS 66207

Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 02-1322-CD

v.

Sharon L. Picard

Kenneth C. Picard, Mortgagor

P.O. Box 242

Madera, PA 16661

Defendant(s)

DATE: January 23, 2003

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

NOTICE OF SHERIFF'S SALE  
OF REAL PROPERTY

OWNER(S): SHARON L. PICARD & KENNETH C. PICARD, MORTGAGOR

PROPERTY: RD 2 Box 184, Clearfield, PA 16830

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on MARCH 7, 2003, at 10:00 AM, IN THE CLEARFIELD COUNTY COURTHOUSE, 1 NORTH SECOND STREET, CLEARFIELD, PA. Our records indicate that you may hold a mortgage or judgment on the property which will be extinguished by the sale. You may wish to attend the sale to protect your interests.

A Schedule of Distribution will be filed by the Sheriff on a date specified by the Sheriff not later than 30 days after sale. Distribution will be made in accordance with the schedule unless exceptions are filed thereto within 10 days after the filing of the schedule.

EXHIBIT A



Name and Address of Sender  
**JODIE**

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

☐ Registered  
☐ Insured  
☐ COD  
☐ Certified

☐ Return Receipt for Merchandise  
☐ Int'l Recorded Del.  
☐ Express Mail

Check appropriate block for Registered Mail:  
☐ With Postal Insurance  
☐ Without postal insurance

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

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge	Act. Value (If Regis.)	Insured Value	Due Sender If COD	R.R. Fee	S.D. Fee	S.H. Fee	Rst. Del. Fee	Remarks
1	PICARD	CLEARFIELD COUNTY TAX CLAIM BUREAU 1 NORTH SECOND STREET, SUITE 116 CLEARFIELD, PA 16830											
2	0233698	DOMESTIC RELATIONS SECTION 1 NORTH SECOND STREET, SUITE 116 CLEARFIELD, PA 16830											
3		COMMONWEALTH OF PA, DEPT. OF REVENUE, BUREAU OF COMPLIANCE, DEPT. 280946, HARRISBURG, PA 17128-0946											
4		TENANTS/OCCUPANTS RD BOX 184, CLEARFIELD, PA 16830											
5	CLEARFIELD COUNTY	ASSOCIATES CDC 3014 PLEASANT VALLEY BLVD., ALTOONA, PA 16602											
6		BENEFICIAL MORTGAGE CO. DBA BENEFICIAL MORTGAGE CO. 90 BEAVER DRIVE, SUITE 114-C, DUBOIS, PA 15801											
7													
8													
9													
10													
11													
12													
13													
14													
15													
Total number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office		Postmaster, Per (Name of Receiving Employee)		The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to third and forth class parcels.							



CHERRY HILL, NJ

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 02-1322-CD

v.  
Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661  
Defendant(s)

PRAECIPE TO FILE PROOF OF SERVICE

TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to the  
captioned matter.

MARK J. UDREN & ASSOCIATES

Date: February 11, 2003

BY:

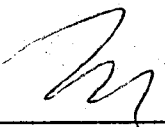
  
Mark J. Udren, ESQUIRE  
Attorney for Plaintiff

EXHIBIT B

The CIT Group/Consumer Finance, Inc., et. al., Plaintiff(s)  
vs.  
Sharon L. Picard, et. al., Defendant(s)



Service of Process by  
**APS International, Ltd.**  
**1-800-328-7171**

APS International Plaza  
7800 Glenroy Rd.  
Minneapolis, MN 55439-3122

### AFFIDAVIT OF SERVICE -- Individual

Service of Process on:

--Sharon L. Picard  
Court Case No. 02-1322-CD

MARK J. UDREN  
Ms. Jodie L. Boos  
1040 North Kings Highway  
Suite 500  
Cherry Hill, NJ 08034

State of: Pennsylvania ss.

County of: Blair

Name of Server: Thomas P. Chatham, undersigned, being duly sworn, deposes and says  
that at the time of service, s/he was over the age of twenty-one, was not a party to this action;

Date/Time of Service: that on the 10 day of February, 2003, at 6:02 o'clock PM

Place of Service: at RD 2, Box 184, city of Clearfield, state of PA

Documents Served: the undersigned served the documents described as:  
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:  
Sharon L. Picard

Person Served, and  
Method of Service: ☒ By personally delivering them into the hands of the person to be served.  
☐ By delivering them into the hands of \_\_\_\_\_, a person of  
suitable age and discretion residing at the Place of Service,  
whose relationship to the person to be served is \_\_\_\_\_

Description of Person Receiving Documents: The person receiving documents is described as follows:  
Sex F; Skin Color W; Hair Color Salt & Pepper; Facial Hair NO  
Approx. Age 53; Approx. Height 5'5"; Approx. Weight 140  
☒ To the best of my knowledge and belief, said person was not engaged in the US Military at  
the time of service.

Signature of Server: Undersigned declares under penalty of perjury  
that the foregoing is true and correct.

Subscribed and sworn to before me this

11th day of February, 2003

[Signature]  
Signature of Server (Date)

[Signature]  
Notary Public (Commission Expires)

**APS International, Ltd.**

APS File #: 058036-0001

Notarial Seal  
Monica Crilly, Notary Public  
City of Altoona, Blair County  
My Commission Expires Aug. 27, 2003

Member, Pennsylvania Association of Notaries

EXHIBIT B

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket #

13483

THE CIT GROUP/CONSUMER FINANCE, INC.

02-1322-CD

VS.

PICARD, KENNETH C.

WRIT OF EXECUTION REAL ESTATE

**SHERIFF RETURNS**

NOW, JANUARY 9, 2003 @ 1:30 P.M. O'CLOCK A LEVY WAS TAKEN ON THE  
PROPERTY OF THE DEFENDANTS. THE PROPERTY WAS ALSO POSTED THIS DATE.

A SALE DATE OF MARCH 7, 2003 WAS SET.

**FILED**

01/31/03  
MAY 19 2003  
KEL

William A. Shaw  
Prothonotary

NOW, JANUARY 9, 2003 @ 1:55 P.M. O'CLOCK SERVED KENNETH C. PICARD,  
DEFENDANT, AT HIS RESIDENCE RD LINGLE'S CIRCLE, SHAWVILLE, CLEARFIELD  
COUNTY, PENNSYLVANIA 16873 BY HANDING TO LISA ROSS, LIVE-IN GIRLFRIEND  
OF THE DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF  
EXECUTION, NOTICE OF SALE, AND COPY OF LEVY, AND MAKING KNOWN TO HER  
THE CONTENTS THEREOF.

NOW, FEBRUARY 18, 2003 RECEIVED FAX FROM ATTORNEY FOR PLAINTIFF TO  
POSTPONE SALE TO APRIL 4, 2003 TO ALLOW FOR SERVICE OF SHARON PICARD.

NOW, MARCH 20, 2003 SENT BY REG AND CERTIFIED MAIL TO R. D. #2, BOX  
184 CLEARFIELD, PA 16830, NOTICE OF SALE, COPY OF WRIT, AND COPY OF  
LEVY..

MARCH 24, 2003 RECEIVED REG AND CERTIFIED MAIL BACK UNCLAIMED.

NOW, MARCH 20, 2003 RECEIVED PROOF OF PERSONAL SERVICE ON SHARON  
PICARD BY AN OUTSIDE SERVICE FROM ATTORNEY OFFICE.

NOW, APRIL 4, 2003 A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANTS.  
THE PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR \$1.00 + COSTS.

NOW, MAY 15, 2003 PAID COSTS FROM ADVANCE AND MADE A REFUND OF UNUSED  
ADVANCE TO THE ATTORNEY.

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 13483

THE CIT GROUP/CONSUMER FINANCE, INC.

02-1322-CD

VS.

PICARD, KENNETH C.

WRIT OF EXECUTION REAL ESTATE

**SHERIFF RETURNS**

---

NOW, MAY 19, 2003 RETURN WRIT AS SALE BEING HELD ON THE PROPERTY OF THE DEFENDANTS. PROPERTY WAS PURCHASED BY THE PLAINTFF FOR \$1.00+ COSTS.

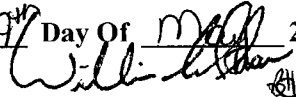
NOW, MAY 19, 2003 DEED WAS FILED.

SHERIFF HAWKINS \$232.01

SURCHARGE \$40.00

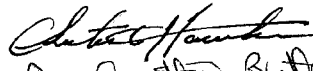
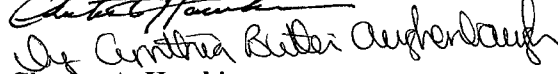
PAID BY ATTORNEY

Sworn to Before Me This

19<sup>th</sup> Day Of May 2003  


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

So Answers,

  
  
Chester A. Hawkins  
Sheriff

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.  
5370 W. 95 Street  
Prairie Village, KS 66207

Plaintiff

v.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor  
P.O. Box 242  
Madera, PA 16661

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 02-1322-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

To satisfy the judgment, interest and costs in the above matter, you  
are directed to levy upon and sell the following described property:

RD 2 Box 184  
Clearfield, PA 16830  
SEE LEGAL DESCRIPTION ATTACHED

Amount due

\$59,554.01

Interest From 10/30/02  
to Date of Sale  
Per diem @\$13.06

(Costs to be added)

Prothonotary costs 120.00  
\$

Prothonotary  
By Willi L. Lister Clerk  
431

Received 11/15/02 @ 12:30 P.M.  
Chester A. Hawkins  
By Cynthia Butler-Aughenbaugh

Date November 4, 2002

COURT OF COMMON PLEAS

NO. 02-1322-CD

=====

The CIT Group/Consumer Finance, Inc.

vs.

Sharon L. Picard  
Kenneth C. Picard, Mortgagor

=====

WRIT OF EXECUTION

=====

REAL DEBT                   \$ 59,554.01

INTEREST                   \$       

from 10/30/02           to

Date of Sale

Per diem @\$13.06

COSTS PAID:

PROTHY                   \$ 120.00

SHERIFF                   \$       

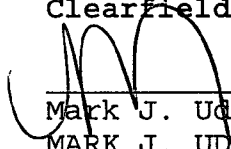
STATUTORY               \$       

COSTS DUE PROTHY.       \$       

PREMISES TO BE SOLD:

RD 2 Box 184

Clearfield, PA 16830

  
\_\_\_\_\_  
Mark J. Udren, ESQUIRE


MARK J. UDREN & ASSOCIATES

1040 NORTH KINGS HIGHWAY

SUITE 500

CHERRY HILL, NJ 08034

(856) 482-6900



All that certain tract or parcel of land situate in the Township of Girard,  
County of Clearfield and Commonwealth of Pennsylvania, bounded and described as  
follows:

BEGINNING at a maple on the public road; thence along an alley North  
sixty-three degrees nineteen minutes East (N 63 degrees 19' E) one hundred  
(100') feet; thence North thirty-one degrees twenty-eight minutes West (N 31  
degrees 28' W) sixty-four (64') feet to an old road and land of the Surveyor  
Run Lumber Company; thence by the same South sixty-six degrees forty-two  
minutes East (S 66 degrees 42' E) forty-eight (48') feet; thence by the same  
South forty-four degrees forty-six minutes East (S 44 degrees 46' E) two  
hundred sixteen (216') feet to a locust; thence by land now or formerly of W.L.  
Gaines South seventy-one degrees thirty-six minutes West (S 71 degrees 36' W)  
one hundred eighty-seven (187') feet to the public road; thence by the same  
North thirty-three degrees fifty minutes West (N 33 degrees 50' W) one hundred  
sixty-seven (167') feet to the maple and place of beginning.

BEING KNOWN AS: RD 2 BOX 184, CLEARFIELD, PA 16830

TAX ID NO.: 114-N6-670-2

TITLE TO SAID PREMISES IS VESTED IN SHARON L. PICARD BY DEED FROM  
SHARON L. PICARD AND KENNETH C. PICARD, DATED 07/20/2001, RECORDED  
07/20/2001, IN DOCUMENT 200111289.



**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME      PICARD                      NO.      02-1322-CD

NOW,      APRIL 4,              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      4TH              day of      APRIL      2003, I exposed the within described real estate of      SHARON L. PICARD AND KENNETH C. PICARD to public venue or outcry at which time and place I sold the same to      THE CIT GROUP/ CONSUMER FINANCE, INC. he/she being the highest bidder, for the sum of      \$1.00 + COSTS      and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	15.00
SERVICE	15.00
MILEAGE	17.55
LEVY	15.00
MILEAGE	2.00
POSTING	15.00
CSDS	10.00
COMMISSION 2%	
POSTAGE	9.46
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	2.00
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES/BILLING	15.00
	5.00
BILLING/PHONE/FAX	10.00

**TOTAL SHERIFF  
COSTS                      232.01**

**DEED COSTS:**

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	29.00
TRANSFER TAX 2%	
<b>TOTAL DEED COSTS</b>	<b>29.00</b>

**DEBIT & INTEREST:**

DEBT-AMOUNT DUE	59,554.01
INTEREST FROM 10/30/02/13.60 PER DIEM TO BE ADDED      TO SALE DATE	

**TOTAL DEBT & INTEREST                      59,554.01**

**COSTS:**

ATTORNEY FEES	
PROTH. SATISFACTION	
ADVERTISING	341.46
LATE CHARGES & FEES	
TAXES - collector      TO 7/7/03	108.12
TAXES - tax claim      TO MAY	1,107.45
DUE	
COST OF SUIT -TO BE ADDED	
LIEN SEARCH	100.00
FORCLOSURE FEES/ESCROW DEFICIT	
ACKNOWLEDGEMENT	5.00
DEED COSTS	29.00
ATTORNEY COMMISSION	
SHERIFF COSTS	232.01
LEGAL JOURNAL AD	162.00
REFUND OF ADVANCE	
REFUND OF SURCHARGE	
PROTHONOTARY	120.00
MORTGAGE SEARCH	40.00
<b>SATISFACTION FEE</b>	
<b>ESCROW DEFICIENCY</b>	
<b>MUNICIPAL LIEN</b>	

**TOTAL COSTS                      2,245.04**

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

CHESTER A. HAWKINS, Sheriff

**MARK J. UDREN & ASSOCIATES**

1040 NORTH KINGS HIGHWAY

SUITE 500

CHERRY HILL, NEW JERSEY 08034

856 . 482 . 6900

FAX: 856 . 482 . 1199

MARK J. UDREN\*  
STUART WINNEG\*\*  
GAYL SPIVAK ORLOFF\*\*\*  
HEIDI R. SPIVAK\*\*\*  
CHRISTOPHER J. FOX\*\*\*  
CORINA CANIZ\*\*\*  
\*ADMITTED NJ, PA, FL  
\*\*ADMITTED PA  
\*\*\*ADMITTED NJ, PA  
TINA MARIE RICH  
OFFICE ADMINISTRATOR

**FREDDIE MAC  
PENNSYLVANIA  
DESIGNATED COUNSEL**

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

PLEASE RESPOND TO NEW JERSEY OFFICE

February 11, 2003

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

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

Re: The CIT Group/Consumer Finance, Inc.  
vs.  
Sharon L. Picard & Kenneth C. Picard, Mortgagor  
Clearfield County C.C.P. No. 02-1322-CD  
Premises: RD 2 Box 184, Clearfield, PA 16830  
SS Date: March 7, 2003

Dear Cindy:

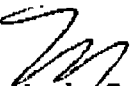
Please Postpone the Sheriff's Sale scheduled for March 7, 2003 to  
April 4, 2003.

Sale is postponed for the following reason:

To allow time for Service of the Notice of Sale.

Thank you for your attention to this matter.

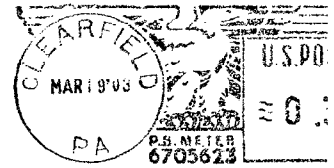
Sincerely yours,

  
Mark J. Udren  
MARK J. UDREN & ASSOCIATES

/jlb



CHESTER A. HAWKINS  
SHERIFF  
COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830



SHARON L. PICARD  
R. D. #2, BOX 184  
CLEARFIELD, PA 16830

*NAA*

*Received  
3-24-03*

PICA002 168302016 1A01 08 03/21/03  
FORWARD TIME EXP RTN TO SEND  
PICARD, KENNETH  
PO BOX 33  
SHAWVILLE PA 16873-0033

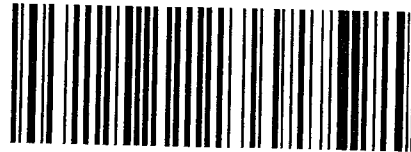
16830+3327 02

RETURN TO SENDER

**CERTIFIED MAIL**



CHESTER A. HAWKINS  
SHERIFF  
COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830



7002 2030 0000 6873 0682



SUSAN L. PICARD  
R. D. #2, BOX 184  
CLEARFIELD, PA 16830

*SMP*

A ☐ INSUFFICIENT ADDRESS  
C ☐ ATTEMPTED NOT KNOWN ☐ OTHER  
S ☒ NO SUCH NUMBER/ STREET  
☒ NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		<p>A. Signature <b>X</b></p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>Susan L. Picard R. D. #2, Box 184 Clearfield, PA 16830</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7002 2030 0000 6873 0682</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>PS Form 3811, August 2001</p>		<p>3. Service Type  <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>Domestic Return Receipt</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

7002 2030 0000 6873 0682

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
OFFICIAL USE	
Postage	\$ 6.00
Certified Fee	2.20
Return Receipt Fee (Endorsement Required)	1.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 9.40
<p>Sent To</p> <p>Susan L. Picard</p> <p>Street, Apt. No., or PO Box No. R. D. #2, Box 184</p> <p>City, State, ZIP+4 Clearfield, PA 16830</p>	
<p>PS Form 3800, June 2002</p> <p>See Reverse for Instructions</p>	

Postmark: CLEARFIELD, PA 16830 MAR 20 2003