

02-1345-CD
The LEADER MORTGAGE CO. vs. DEAN K. ROWLES

In The Court of Common Pleas of Clearfield County, Pennsylvania

THE LEADER MORTGAGE COMPANY

VS.

ROWLES, DEAN K.

02
25-1345-CD

Sheriff Docket #

13370

WRIT OF EXECUTION POSSESSION

SHERIFF RETURNS

NOW, JANUARY 24, 2003 @ 9:10 A.M. SERVED WRIT OF POSSESSION ON AMY ROWLES, DEFENDANT, AT THE CLEARFIELD COUNTY COURTHOUSE, ONE NORTH SECOND STREET, SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO AMY ROWLES, DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF POSSESSION AND MAKING KNOWN TO HER THE CONTENTS THEREOF.

NOW, JANUARY 24, 2003 @ 9:10 A.M. O'CLOCK SERVED WRIT OF POSSESSION ON DEAN K. ROWLES, DEFENDANT, AT THE CLEARFIELD COUNTY COURTHOUSE, ONE NORTH SECOND STREET, SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO AMY ROWLES, WIFE OF DEFENDANT/DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF POSSESSION AND MAKING KNOWN TO HER THE CONTENTS THEREOF.

NOW, MAY 13, 2002 RETURN WRIT AS BEING SERVED. PAID COSTS FROM ADVANCE AND MADE REFUND OF UNUSED ADVANCE TO THE ATTORNEY.

SHERIFF HAWKINS \$71.25

SURCHARGE \$20.00

PAID BY ATTORNEY

FILED

0 12:29 BA

MAY 13 2003

William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

THE LEADER MORTGAGE COMPANY

Sheriff Docket # 13370

25-1345-CD

VS.

ROWLES, DEAN K.


WRIT OF EXECUTION POSSESSION

SHERIFF RETURNS

Sworn to Before Me This

So Answers,

____ Day Of _____ 2003


By Cynthia Bette-Argho-Deugh
Chester A. Hawkins
Sheriff

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY PENNSYLVANIA
CIVIL ACTION

WRIT OF POSSESSION

Leader Mortgage Company

Plaintiff(s)

Vs.

NO.: 2002-01345-CD

Dean K. Rowles

Amy Rowles

Defendant(s)

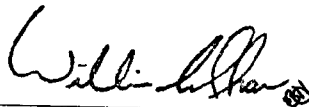
COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

To the Sheriff of Clearfield County:

- (1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to: Plaintiff

See attached property description

- (2) To satisfy the costs against Defendant(s) you are directed to levy upon the above listed property of Defendant(s) and sell his/their interests therein.



William A. Shaw, Prothonotary

Received writ this 30th day of
December A.D. 2003
at 3:00 a.m./p.m.

Charles A. Hankins

Sheriff By Cynthia Bitter Aushenbaugh

REQUESTING PARTY NAME: The Leader Mortgage Company
ATTORNEY FILING: Leon P. Haller, Esq.

ALL THAT CERTAIN piece, parcel or lot of ground, together with the improvements thereon, situate in the Borough of Irvona, County of Clearfield, and the Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a point on corner of Irvin and Railroad Streets; thence in a Southeasterly direction along line of said Railroad Street, one hundred fifty (150) feet to post on alley; thence in Northeasterly direction along line of said alley, twenty-five (25) feet to a post or center of Lot No. 334; thence in a Northwesterly direction through center of Lot No. 334 to post on Irvin Street; thence along line of said Irvin Street; twenty-five (25) feet to a post or place of BEGINNING, and being one-half (1/2) of Lot No. 334 in the plan of the Borough of Irvona.

HAVING THEREON ERECTED A DWELLING KNOWN AS Irvin & Railroad Streets, Irvona, Pennsylvania.

BEING THE SAME PREMISES WHICH John F. Patterson, by Deed dated May 16, 1996 and recorded May 24, 1996 in Clearfield County Deed Book 1760, Page 537, granted and conveyed unto Dean K. Rowles.

Assessment # 11-H16-353-74

THE LEADER MORTGAGE COMPANY : IN THE COURT OF COMMON PLEAS
 :
 : CLEARFIELD COUNTY, PENNSYLVANIA
Plaintiff :
 :
vs. : CIVIL ACTION - LAW
 :
 : NO. 02-1345-CD
DEAN K. ROWLES AND AMY ROWLES :
 :
Defendants : IN EJECTMENT

PRAECIPE FOR WRIT OF POSSESSION

TO THE PROTHONOTARY:

Issue a Writ of Possession against Dean K. Rowles and Amy Rowles in the above matter for the possession of the premises set forth in the attached legal description.

PURCELL, KRUG & HALLER

By: 

Leon P. Haller, Esquire
1719 North Front Street
Harrisburg, PA 17102-2392
(717) 234-4178
Attorney ID #15700
Attorney for Plaintiff

Dated: December 23, 2002

FILED

DEC 30 2002

William A. Shaw
Prothonotary

ALL THAT CERTAIN piece, parcel or lot of ground, together with the improvements thereon, situate in the Borough of Irvona, County of Clearfield, and the Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a point on corner of Irvin and Railroad Streets; thence in a Southeasterly direction along line of said Railroad Street, one hundred fifty (150) feet to post on alley; thence in Northeasterly direction along line of said alley, twenty-five (25) feet to a post or center of Lot No. 334; thence in a Northwesterly direction through center of Lot No. 334 to post on Irvin Street; thence along line of said Irvin Street; twenty-five (25) feet to a post or place of BEGINNING, and being one-half (1/2) of Lot No. 334 in the plan of the Borough of Irvona.

HAVING THEREON ERECTED A DWELLING KNOWN AS Irvin & Railroad Streets, Irvona, Pennsylvania.

BEING THE SAME PREMISES WHICH John F. Patterson, by Deed dated May 16, 1996 and recorded May 24, 1996 in Clearfield County Deed Book 1760, Page 537, granted and conveyed unto Dean K. Rowles.

Assessment # 11-H16-353-74

FILED

m 11:07-2002
DEC 30 2002

William A. Shaw
Prothonotary

Any Hobbies

pd. 2000

4 cc or 4 units w/prop. descr.
to SNF



IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY PENNSYLVANIA
CIVIL ACTION

COPY

WRIT OF POSSESSION

Leader Mortgage Company

Plaintiff(s)

Vs.

NO.: 2002-01345-CD

Dean K. Rowles
Amy Rowles

Defendant(s)

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

To the Sheriff of Clearfield County:

- (1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to: Plaintiff

See attached property description

- (2) To satisfy the costs against Defendant(s) you are directed to levy upon the above listed property of Defendant(s) and sell his/their interests therein.

William A. Shaw, Prothonotary

Received writ this _____ day of
_____ A.D. _____
at _____ a.m./p.m.

Sheriff

REQUESTING PARTY NAME: The Leader Mortgage Company
ATTORNEY FILING: Leon P. Haller, Esq.

CC
ALL THAT CERTAIN piece, parcel or lot of ground, together with the improvements thereon, situate in the Borough of Irvona, County of Clearfield, and the Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a point on corner of Irvin and Railroad Streets; thence in a Southeasterly direction along line of said Railroad Street, one hundred fifty (150) feet to post on alley; thence in Northeasterly direction along line of said alley, twenty-five (25) feet to a post or center of Lot No. 334; thence in a Northwesterly direction through center of Lot No. 334 to post on Irvin Street; thence along line of said Irvin Street; twenty-five (25) feet to a post or place of BEGINNING, and being one-half (1/2) of Lot No. 334 in the plan of the Borough of Irvona.

HAVING THEREON ERECTED A DWELLING KNOWN AS Irvin & Railroad Streets, Irvona, Pennsylvania.

BEING THE SAME PREMISES WHICH John F. Patterson, by Deed dated May 16, 1996 and recorded May 24, 1996 in Clearfield County Deed Book 1760, Page 537, granted and conveyed unto Dean K. Rowles.

Assessment # 11-H16-353-74

THE LEADER MORTGAGE COMPANY : IN THE COURT OF COMMON PLEAS
: :
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
: :
vs. : CIVIL ACTION - LAW
: :
DEAN K. ROWLES AND AMY ROWLES : NO. 02-1345-CD
: :
Defendants : IN EJECTMENT

PRAECIPE FOR DEFAULT JUDGMENT IN EJECTMENT
FOR POSSESSION OF REAL PROPERTY

TO THE PROTHONOTARY:

Enter default judgment in ejectment for possession of the premises Post Office Box 286, Irvin and Railroad Streets, Irvona, Pennsylvania 16656, described in the attached legal description in favor of Plaintiff and against the Defendants, Dean K. Rowles and Amy Rowles, and their successors, heirs and assigns for failure to answer the Complaint within twenty (20) days after service thereof on September 3, 2002. I hereby certify that the Notice of Default required by Pa.R.C.P. 237.1 was mailed to Defendant above named on December 9, 2002.

PURCELL, KRUG & HALLER

By: 

Leon P. Haller, Esquire
1719 North Front Street
Harrisburg, PA 17102-2392
(717)234-4178
Attorney ID #15700
Attorney for Plaintiff

Dated: December 23, 2002

FILED

DEC 30 2002

William A. Shaw
Prothonotary

THE LEADER MORTGAGE COMPANY : IN THE COURT OF COMMON PLEAS
 :
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
 :
vs. :
 : CIVIL ACTION - LAW
 :
DEAN K. ROWLES AND AMY ROWLES : NO. 02-1345-CD
 :
Defendants : IN EJECTMENT

NOTICE OF ENTRY OF JUDGMENT BY DEFAULT

TO: Dean K. Rowles and Amy Rowles
Defendants in the above action

You are hereby notified that on December 30, 2002,
Judgment by Default has been entered against you in the above action
for possession of the real property described in the attached legal
description, for the reason that you failed to file an Answer to the
Complaint within 20 days after the said Complaint was served upon you
on September 3, 2002.



Prothonotary

I hereby certify that the names and address of the proper
persons to receive this notice under Pa.R.C.P. 236 is:

AMY ROWLES
POST OFFICE BOX 286
IRVIN AND RAILROAD STREETS
IRVONA, PA 16656

DEAN K. ROWLES
POST OFFICE BOX 286
IRVIN AND RAILROAD STREETS
IRVONA, PA 16656



Leon P. Haller
Attorney for Plaintiff

THE LEADER MORTGAGE COMPANY

Plaintiff

vs.

DEAN K. ROWLES AND AMY ROWLES

Defendants

: IN THE COURT OF COMMON PLEAS
:
: CLEARFIELD COUNTY, PENNSYLVANIA
:
:
: CIVIL ACTION - LAW
:
: NO. 02-1345-CD
:
: IN EJECTMENT

To: AMY ROWLES
POST OFFICE BOX 286
IRVIN AND RAILROAD STREETS
IRVONA, PA 16656

DEAN K. ROWLES
POST OFFICE BOX 286
IRVIN AND RAILROAD STREETS
IRVONA, PA 16656

DATE OF NOTICE: DECEMBER 9, 2002

IMPORTANT NOTICE

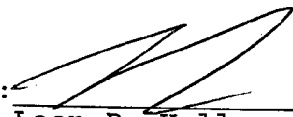
YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU 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.

DAVID S. MEHOLOCK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
CLEARFIELD, PA 16830

TELEPHONE (814)765-2641 EXTENSION 5982

PURCELL, KRUG & HALLER

By:

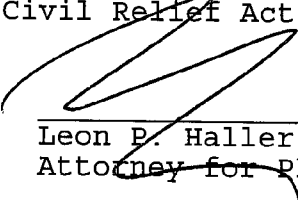

Leon P. Haller, Esquire
1719 North Front Street
Harrisburg, PA 17102-2392
(717)234-4178
Attorney ID #15700
Attorney for Plaintiff

THE LEADER MORTGAGE COMPANY	:	IN THE COURT OF COMMON PLEAS
	:	
Plaintiff	:	CLEARFIELD COUNTY, PENNSYLVANIA
	:	
vs.	:	CIVIL ACTION - LAW
	:	
DEAN K. ROWLES AND AMY ROWLES	:	NO. 02-1345-CD
	:	
Defendants	:	IN EJECTMENT

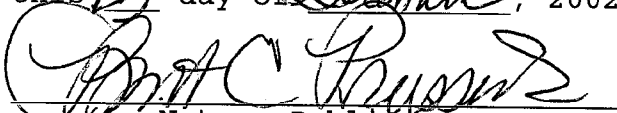
AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA)	
)	ss:
COUNTY OF DAUPHIN)	

LEON P. HALLER, attorney for Plaintiff, being duly sworn according to law, deposes and says that he is a duly constituted representative for the Plaintiff in the above captioned action; that he is duly authorized to make this affidavit; that he has personal knowledge, information and belief, that Defendant of the real estate described in the Complaint are not in the Military or Naval Services of the United States or its allies or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of 1940, as amended.

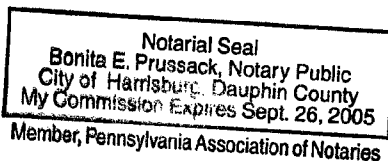

 Leon P. Haller
 Attorney for Plaintiff

SWORN to and subscribed before me
 this 13th day of December, 2002.


 Notary Public

My commission expires:

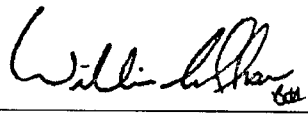
(SEAL)



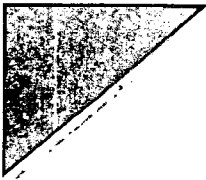
THE LEADER MORTGAGE COMPANY : IN THE COURT OF COMMON PLEAS
: :
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
: :
vs. : CIVIL ACTION - LAW
: :
DEAN K. ROWLES AND AMY ROWLES : NO. 02-1345-CD
: :
Defendants : IN EJECTMENT

ENTRY OF JUDGMENT BY DEFAULT

AND NOW, on this 30th day of December, 2002,
default judgment is hereby entered against the Defendants, Dean K.
Rowles and Amy Rowles, and their successors, heirs and assigns, in
ejectment for possession of the premises described in the attached
legal description.



Prothonotary



ALL THAT CERTAIN piece, parcel or lot of ground, together with the improvements thereon, situate in the Borough of Irvona, County of Clearfield, and the Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a point on corner of Irvin and Railroad Streets; thence in a Southeasterly direction along line of said Railroad Street, one hundred fifty (150) feet to post on alley; thence in Northeasterly direction along line of said alley, twenty-five (25) feet to a post or center of Lot No. 334; thence in a Northwesterly direction through center of Lot No. 334 to post on Irvin Street; thence along line of said Irvin Street; twenty-five (25) feet to a post or place of BEGINNING, and being one-half (1/2) of Lot No. 334 in the plan of the Borough of Irvona.

HAVING THEREON ERECTED A DWELLING KNOWN AS Irvin & Railroad Streets, Irvona, Pennsylvania.

BEING THE SAME PREMISES WHICH John F. Patterson, by Deed dated May 16, 1996 and recorded May 24, 1996 in Clearfield County Deed Book 1760, Page 537, granted and conveyed unto Dean K. Rowles.

Assessment # 11-H16-353-74

FILED

Atty pd.
20:00

m/12:40 PM
DEC 30 2002

12:41 Notice to
each def.

William A. Shaw & cc sh ff
Prothonotary



THE LEADER MORTGAGE COMPANY : IN THE COURT OF COMMON PLEAS
: :
Plaintiff : CLEARFIELD COUNTY, PENNSYLVANIA
: :
vs. : CIVIL ACTION - LAW
: :
DEAN K. ROWLES : NO. 02-~~X~~1345-CD
: :
Defendant : IN EJECTMENT

P R A E C I P E

TO THE PROTHONOTARY:

Please index AMY ROWLES as a party Defendant to the above
action in accordance with Rule 410(b)(2) of the Pa.R.C.P.

PURCELL, KRUG & HALLER

By: 

Leon P. Haller
1719 North Front Street
Harrisburg, PA 17102-2392
(717) 234-4178
Attorney ID #15700
Attorney for Plaintiff

Dated: December 9, 2002

FILED

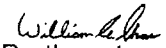
DEC 12 2002

m/2:45/um
William A. Shaw
Prothonotary/Clerk of Courts
1 CEN to ATT

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

DEC 12 2002

Attest.


Prothonotary/
Clerk of Courts

COPY

THE LEADER MORTGAGE COMPANY : IN THE COURT OF COMMON PLEAS
 :
 : CLEARFIELD COUNTY, PENNSYLVANIA
Plaintiff :
 :
 :
vs. : CIVIL ACTION - LAW
 :
 : NO. 02-1345-CO
 :
 :
DEAN K. ROWLES :
 :
 :
Defendant : IN EJECTMENT

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by 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.

DAVID S. MEHLOCK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
CLEARFIELD, PA 16830

N O T I C I A

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. Usted debe presentar una apariciencia escrita o en persona o por abogado y archivar en la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. See avisado que si usted no se defiende, la corte tomara medidas y puede entrar una orden contra usted sin previo aviso o notificacion y por cualquier queja o alivio que es pedido en la petition de demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

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

AUG 28 2002

Attest.

William L. Brown
Prothonotary/
Clerk of Courts

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

DAVID S. MEHOLOCK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
CLEARFIELD, PA 16830

THE LEADER MORTGAGE COMPANY	:	IN THE COURT OF COMMON PLEAS
	:	
Plaintiff	:	CLEARFIELD COUNTY, PENNSYLVANIA
	:	
vs.	:	CIVIL ACTION - LAW
	:	
DEAN K. ROWLES	:	NO.
	:	
Defendant	:	IN EJECTMENT

C O M P L A I N T

1. Plaintiff, Leader Mortgage Company, is a corporation with an office located at 1015 Euclid Avenue, Cleveland, Ohio 44115.

2. Defendant, Dean K. Rowles, is an adult individuals whose last known precise residence is Post Office Box 386, Irvona, Pennsylvania 16656 a/k/a Irvin and Railroad Streets, Irvona, Pennsylvania 16656.

3. Plaintiff avers that any person not set forth above, but in possession of the premises set forth in Paragraph 2 is, and shall become a Defendant to this action by virtue of Rule 410(b)(2) of the Pennsylvania Rules of Civil Procedure, upon identification by the Sheriff of Clearfield County in his Return of Service of such person, and upon Praecipe of the Plaintiff.

4. Prior to June 7, 2002, Defendant was the owner of certain real property known as Post Office Box 386, Irvona, Pennsylvania 16656 a/k/a Irvin and Railroad Streets, Irvona, Pennsylvania 16656, a copy of the description attached hereto and made a part hereof as Exhibit "A".

5. Said premises were sold by the Sheriff of Clearfield County at a Sheriff's Sale held at the Clearfield County Court House on June 7,

2002, after due advertisement according to law, under and by virtue of a Writ of Execution issued out of the Court of Common Pleas of Clearfield County, No. 01-940-CD at the suit of The Leader Mortgage Company vs. Dean K. Rowles, the said proceedings being incorporated herein by reference.

6. The aforesaid property was purchased at Sale by The Leader Mortgage Company, said proceedings being incorporated herein by reference.

7. By virtue of the aforesaid Sheriff's Sale, Plaintiff acquired title to the said premises.

8. Defendant is presently in possession of the said premises, having come into said possession by virtue of his prior ownership.

9. Plaintiff's Abstract of Title is attached hereto as Exhibit "B".

WHEREFORE, Plaintiff demands judgment against Defendant in Ejectment for recovery of premises described in Exhibit "A" attached hereto and made a part hereof, plus costs of suit.

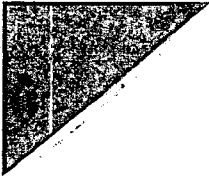
PURCELL, KRUG & HALLER

By: _____

Leon P. Haller, Esquire
1719 North Front Street
Harrisburg, PA 17102-2392
(717) 234-4178
Attorney ID #15700
Attorney for Plaintiff

Dated: August 21, 2002

7



ALL THAT CERTAIN piece, parcel or lot of ground, together with the improvements thereon, situate in the Borough of Irvona, County of Clearfield, and the Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a point on corner of Irvin and Railroad Streets; thence in a Southeasterly direction along line of said Railroad Street, one hundred fifty (150) feet to post on alley; thence in Northeasterly direction along line of said alley, twenty-five (25) feet to a post or center of Lot No. 334; thence in a Northwesterly direction through center of Lot No. 334 to post on Irvin Street; thence along line of said Irvin Street; twenty-five (25) feet to a post or place of BEGINNING, and being one-half (1/2) of Lot No. 334 in the plan of the Borough of Irvona.

HAVING THEREON ERECTED A DWELLING KNOWN AS Irvin & Railroad Streets, Irvona, Pennsylvania.

BEING THE SAME PREMISES WHICH John F. Patterson, by Deed dated May 16, 1996 and recorded May 24, 1996 in Clearfield County Deed Book 1760, Page 537, granted and conveyed unto Dean K. Rowles.

Assessment # 11-H16-353-74

EXHIBIT "A"

PLAINTIFF'S ABSTRACT OF TITLE

1. Property acquired by Plaintiff at York County Sheriff's Sale conducted by Sheriff of Clearfield County on June 7, 2002.
2. Deed from John F. Patterson dated May 16, 1996 and recorded May 24, 1996 in the Recorder of Deeds Office in and for Clearfield County, Pennsylvania, in Deed Book 1760, Page 537, to Dean K. Rowles.

EXHIBIT "B"

VERIFICATION

I verify that the statements made in the foregoing Complaint are true and correct.

I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Leon P. Haller

Dated: August 21, 2002

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 12978

THE LEADER MORTGAGE COMPANY

02-1345-CD

VS.

ROWLES, DEAN K.

COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW SEPTEMBER 3, 2002 AT 12:56 AM DST SERVED THE WITHIN COMPLAINT
IN EJECTMENT ON OCCUPANTS OF DEAN ROWLES PROPERTY AT PO BOX 386
A/K/A IRVIN & RAILROAD STS., IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA
BY HANDING TO AMY ROWLES, ADULT AT RESIDENCE TWO TRUE AND ATTESTED
COPIES OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER
THE CONTENTS THEREOF.

Return Costs

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

Sworn to Before Me This

13th Day Of November 2002

William A. Shaw

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

So Answers,

Chester A. Hawkins
by Mandy Hahn

Chester A. Hawkins
Sheriff

FILED

013:08 BN
NOV 13 2002 E
KPT

William A. Shaw
Prothonotary

COPY

THE LEADER MORTGAGE COMPANY : IN THE COURT OF COMMON PLEAS
 :
 : CLEARFIELD COUNTY, PENNSYLVANIA
Plaintiff :
 :
 : CIVIL ACTION - LAW
 :
 : NO. 02-1345-CD
 :
 :
DEAN K. ROWLES :
 :
 :
Defendant : IN EJECTMENT

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by 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.

DAVID S. MEHLOCK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
CLEARFIELD, PA 16830

N O T I C I A

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. Usted debe presentar una apariciencia escrita o en persona o por abogado y archivar en la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. See avisado que si usted no se defiende, la corte tomara medidas y puede entrar una orden contra usted sin previo aviso o notificacion y por cualquier queja o alivio que es pedido en la petition de demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

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

AUG 28 2002

Attest.

William L. Shaw
Prothonotary/
Clerk of Courts

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

DAVID S. MEHOLOCK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
CLEARFIELD, PA 16830

THE LEADER MORTGAGE COMPANY	:	IN THE COURT OF COMMON PLEAS
	:	
	:	CLEARFIELD COUNTY, PENNSYLVANIA
Plaintiff	:	
	:	
vs.	:	CIVIL ACTION - LAW
	:	
	:	NO.
DEAN K. ROWLES	:	
	:	
Defendant	:	IN EJECTMENT

C O M P L A I N T

1. Plaintiff, Leader Mortgage Company, is a corporation with an office located at 1015 Euclid Avenue, Cleveland, Ohio 44115.

2. Defendant, Dean K. Rowles, is an adult individuals whose last known precise residence is Post Office Box 386, Irvona, Pennsylvania 16656 a/k/a Irvin and Railroad Streets, Irvona, Pennsylvania 16656.

3. Plaintiff avers that any person not set forth above, but in possession of the premises set forth in Paragraph 2 is, and shall become a Defendant to this action by virtue of Rule 410(b)(2) of the Pennsylvania Rules of Civil Procedure, upon identification by the Sheriff of Clearfield County in his Return of Service of such person, and upon Praecipe of the Plaintiff.

4. Prior to June 7, 2002, Defendant was the owner of certain real property known as Post Office Box 386, Irvona, Pennsylvania 16656 a/k/a Irvin and Railroad Streets, Irvona, Pennsylvania 16656, a copy of the description attached hereto and made a part hereof as Exhibit "A".

5. Said premises were sold by the Sheriff of Clearfield County at a Sheriff's Sale held at the Clearfield County Court House on June 7,

2002, after due advertisement according to law, under and by virtue of a Writ of Execution issued out of the Court of Common Pleas of Clearfield County, No. 01-940-CD at the suit of The Leader Mortgage Company vs. Dean K. Rowles, the said proceedings being incorporated herein by reference.

6. The aforesaid property was purchased at Sale by The Leader Mortgage Company, said proceedings being incorporated herein by reference.

7. By virtue of the aforesaid Sheriff's Sale, Plaintiff acquired title to the said premises.

8. Defendant is presently in possession of the said premises, having come into said possession by virtue of his prior ownership.

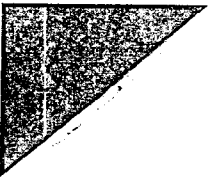
9. Plaintiff's Abstract of Title, is attached hereto as Exhibit "B".

WHEREFORE, Plaintiff demands judgment against Defendant in Ejectment for recovery of premises described in Exhibit "A" attached hereto and made a part hereof, plus costs of suit.

PURCELL, KRUG & HALLER

By: _____
Leon P. Haller, Esquire
1719 North Front Street
Harrisburg, PA 17102-2392
(717) 234-4178
Attorney ID #15700
Attorney for Plaintiff

Dated: August 21, 2002



ALL THAT CERTAIN piece, parcel or lot of ground, together with the improvements thereon, situate in the Borough of Irvona, County of Clearfield, and the Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a point on corner of Irvin and Railroad Streets; thence in a Southeasterly direction along line of said Railroad Street, one hundred fifty (150) feet to post on alley; thence in Northeasterly direction along line of said alley, twenty-five (25) feet to a post or center of Lot No. 334; thence in a Northwesterly direction through center of Lot No. 334 to post on Irvin Street; thence along line of said Irvin Street; twenty-five (25) feet to a post or place of BEGINNING, and being one-half (1/2) of Lot No. 334 in the plan of the Borough of Irvona.

HAVING THEREON ERECTED A DWELLING KNOWN AS Irvin & Railroad Streets, Irvona, Pennsylvania.

BEING THE SAME PREMISES WHICH John F. Patterson, by Deed dated May 16, 1996 and recorded May 24, 1996 in Clearfield County Deed Book 1760, Page 537, granted and conveyed unto Dean K. Rowles.

Assessment # 11-H16-353-74

EXHIBIT "A"

PLAINTIFF'S ABSTRACT OF TITLE

1. Property acquired by Plaintiff at York County Sheriff's Sale conducted by Sheriff of Clearfield County on June 7, 2002.
2. Deed from John F. Patterson dated May 16, 1996 and recorded May 24, 1996 in the Recorder of Deeds Office in and for Clearfield County, Pennsylvania, in Deed Book 1760, Page 537, to Dean K. Rowles.

VERIFICATION

I verify that the statements made in the foregoing Complaint are true and correct.

I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Leon P. Haller

Dated: August 21, 2002

THE LEADER MORTGAGE COMPANY	:	IN THE COURT OF COMMON PLEAS
	:	
Plaintiff	:	CLEARFIELD COUNTY, PENNSYLVANIA
	:	
vs.	:	CIVIL ACTION - LAW
	:	
	:	NO. 02-1345-CD
DEAN K. ROWLES	:	
	:	
Defendant	:	IN EJECTMENT

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by 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.

DAVID S. MEHLOCK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
CLEARFIELD, PA 16830

N O T I C I A

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. Usted debe presentar una apariciencia escrita o en persona o por abogado y archivar en la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. See avisado que si usted no se defiende, la corte tomara medidas y puede entrar una orden contra usted sin previo aviso o notificacion y por cualquier queja o alivio que es pedido en la peticion de demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

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

DAVID S. MEHOLOCK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
CLEARFIELD, PA 16830

THE LEADER MORTGAGE COMPANY : IN THE COURT OF COMMON PLEAS
 :
 : CLEARFIELD COUNTY, PENNSYLVANIA
Plaintiff :
 :
 :
vs. : CIVIL ACTION - LAW
 :
 : NO. 02-1345-CD
DEAN K. ROWLES :
 :
 :
Defendant : IN EJECTMENT

C O M P L A I N T

1. Plaintiff, Leader Mortgage Company, is a corporation with an office located at 1015 Euclid Avenue, Cleveland, Ohio 44115.

2. Defendant, Dean K. Rowles, is an adult individuals whose last known precise residence is Post Office Box 386, Irvona, Pennsylvania 16656 a/k/a Irvin and Railroad Streets, Irvona, Pennsylvania 16656.

3. Plaintiff avers that any person not set forth above, but in possession of the premises set forth in Paragraph 2 is, and shall become a Defendant to this action by virtue of Rule 410(b)(2) of the Pennsylvania Rules of Civil Procedure, upon identification by the Sheriff of Clearfield County in his Return of Service of such person, and upon Praecipe of the Plaintiff.

4. Prior to June 7, 2002, Defendant was the owner of certain real property known as Post Office Box 386, Irvona, Pennsylvania 16656 a/k/a Irvin and Railroad Streets, Irvona, Pennsylvania 16656, a copy of the description attached hereto and made a part hereof as Exhibit "A".

5. Said premises were sold by the Sheriff of Clearfield County at a Sheriff's Sale held at the Clearfield County Court House on June 7,

2002, after due advertisement according to law, under and by virtue of a Writ of Execution issued out of the Court of Common Pleas of Clearfield County, No. 01-940-CD at the suit of The Leader Mortgage Company vs. Dean K. Rowles, the said proceedings being incorporated herein by reference.

6. The aforesaid property was purchased at Sale by The Leader Mortgage Company, said proceedings being incorporated herein by reference.

7. By virtue of the aforesaid Sheriff's Sale, Plaintiff acquired title to the said premises.

8. Defendant is presently in possession of the said premises, having come into said possession by virtue of his prior ownership.


9. Plaintiff's Abstract of Title is attached hereto as Exhibit "B".

WHEREFORE, Plaintiff demands judgment against Defendant in Ejectment for recovery of premises described in Exhibit "A" attached hereto and made a part hereof, plus costs of suit.

PURCELL, KRUG & HALLER

By: _____
Leon P. Haller, Esquire
1719 North Front Street
Harrisburg, PA 17102-2392
(717)234-4178
Attorney ID #15700
Attorney for Plaintiff

Dated: August 21, 2002



ALL THAT CERTAIN piece, parcel or lot of ground, together with the improvements thereon, situate in the Borough of Irvona, County of Clearfield, and the Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a point on corner of Irvin and Railroad Streets; thence in a Southeasterly direction along line of said Railroad Street, one hundred fifty (150) feet to post on alley; thence in Northeasterly direction along line of said alley, twenty-five (25) feet to a post or center of Lot No. 334; thence in a Northwesterly direction through center of Lot No. 334 to post on Irvin Street; thence along line of said Irvin Street; twenty-five (25) feet to a post or place of BEGINNING, and being one-half (1/2) of Lot No. 334 in the plan of the Borough of Irvona.

HAVING THEREON ERECTED A DWELLING KNOWN AS Irvin & Railroad Streets, Irvona, Pennsylvania.

BEING THE SAME PREMISES WHICH John F. Patterson, by Deed dated May 16, 1996 and recorded May 24, 1996 in Clearfield County Deed Book 1760, Page 537, granted and conveyed unto Dean K. Rowles.

Assessment # 11-H16-353-74

EXHIBIT "A"

PLAINTIFF'S ABSTRACT OF TITLE

1. Property acquired by Plaintiff at York County Sheriff's Sale conducted by Sheriff of Clearfield County on June 7, 2002.
2. Deed from John F. Patterson dated May 16, 1996 and recorded May 24, 1996 in the Recorder of Deeds Office in and for Clearfield County, Pennsylvania, in Deed Book 1760, Page 537, to Dean K. Rowles.

VERIFICATION

I verify that the statements made in the foregoing Complaint are true and correct.

I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Leon P. Haller

Dated: August 21, 2002

THE LEADER MORTGAGE COMPANY	:	IN THE COURT OF COMMON PLEAS
	:	
Plaintiff	:	CLEARFIELD COUNTY, PENNSYLVANIA
	:	
vs.	:	CIVIL ACTION - LAW
	:	
DEAN K. ROWLES	:	NO. 02-1345-00
	:	
Defendant	:	IN EJECTMENT

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by 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.

DAVID S. MEHOLOCK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
CLEARFIELD, PA 16830

N O T I C I A

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene viente (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Usted debe presentar una apariciencia escrita o en persona o por abogado y archivar en la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. See avisado que si usted no se defiende, la corte tomara medidas y puede entrar una orden contra usted sin previo aviso o notificacion y por cualquier queja o alivio que es pedido en la peticion de demanda. Usted puede perder dinero o sus propiedades o otros derechos importantes para usted.

FILED

BX
 AUG 28 2002
 m 11:50 AM
 William A. Shaw
 Prothonotary
 80.00
 Acc Sherry

LLEVE ESTA DEMANDA A UN ABODAGO IMMEDIATEMENTE. SI NO TIENNE
ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO.
VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCIONSE
ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR
ARISTENCIA LEGAL.

DAVID S. MEHOLOCK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURT HOUSE
CLEARFIELD, PA 16830

THE LEADER MORTGAGE COMPANY	:	IN THE COURT OF COMMON PLEAS
	:	
Plaintiff	:	CLEARFIELD COUNTY, PENNSYLVANIA
	:	
vs.	:	CIVIL ACTION - LAW
	:	
DEAN K. ROWLES	:	NO. 02 - 1345 - CD
	:	
Defendant	:	IN EJECTMENT

C O M P L A I N T

1. Plaintiff, Leader Mortgage Company, is a corporation with an office located at 1015 Euclid Avenue, Cleveland, Ohio 44115.

2. Defendant, Dean K. Rowles, is an adult individuals whose last known precise residence is Post Office Box 386, Irvona, Pennsylvania 16656 a/k/a Irvin and Railroad Streets, Irvona, Pennsylvania 16656.

3. Plaintiff avers that any person not set forth above, but in possession of the premises set forth in Paragraph 2 is, and shall become a Defendant to this action by virtue of Rule 410(b)(2) of the Pennsylvania Rules of Civil Procedure, upon identification by the Sheriff of Clearfield County in his Return of Service of such person, and upon Praecipe of the Plaintiff.

4. Prior to June 7, 2002, Defendant was the owner of certain real property known as Post Office Box 386, Irvona, Pennsylvania 16656 a/k/a Irvin and Railroad Streets, Irvona, Pennsylvania 16656, a copy of the description attached hereto and made a part hereof as Exhibit "A".

5. Said premises were sold by the Sheriff of Clearfield County at a Sheriff's Sale held at the Clearfield County Court House on June 7,

2002, after due advertisement according to law, under and by virtue of a Writ of Execution issued out of the Court of Common Pleas of Clearfield County, No. 01-940-CD at the suit of The Leader Mortgage Company vs. Dean K. Rowles, the said proceedings being incorporated herein by reference.

6. The aforesaid property was purchased at Sale by The Leader Mortgage Company, said proceedings being incorporated herein by reference.

7. By virtue of the aforesaid Sheriff's Sale, Plaintiff acquired title to the said premises.

8. Defendant is presently in possession of the said premises, having come into said possession by virtue of his prior ownership.

9. Plaintiff's Abstract of Title is attached hereto as Exhibit "B".


WHEREFORE, Plaintiff demands judgment against Defendant in Ejectment for recovery of premises described in Exhibit "A" attached hereto and made a part hereof, plus costs of suit.

PURCELL, KRUG & HALLER

By: 

Leon P. Haller, Esquire
1719 North Front Street
Harrisburg, PA 17102-2392
(717) 234-4178
Attorney ID #15700
Attorney for Plaintiff

Dated: August 21, 2002



ALL THAT CERTAIN piece, parcel or lot of ground, together with the improvements thereon, situate in the Borough of Irvona, County of Clearfield, and the Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a point on corner of Irvin and Railroad Streets; thence in a Southeasterly direction along line of said Railroad Street, one hundred fifty (150) feet to post on alley; thence in Northeasterly direction along line of said alley, twenty-five (25) feet to a post or center of Lot No. 334; thence in a Northwesterly direction through center of Lot No. 334 to post on Irvin Street; thence along line of said Irvin Street; twenty-five (25) feet to a post or place of BEGINNING, and being one-half (1/2) of Lot No. 334 in the plan of the Borough of Irvona.

HAVING THEREON ERECTED A DWELLING KNOWN AS Irvin & Railroad Streets, Irvona, Pennsylvania.

BEING THE SAME PREMISES WHICH John F. Patterson, by Deed dated May 16, 1996 and recorded May 24, 1996 in Clearfield County Deed Book 1760, Page 537, granted and conveyed unto Dean K. Rowles.

Assessment # 11-H16-353-74

EXHIBIT "A"

PLAINTIFF'S ABSTRACT OF TITLE

1. Property acquired by Plaintiff at York County Sheriff's Sale conducted by Sheriff of Clearfield County on June 7, 2002.

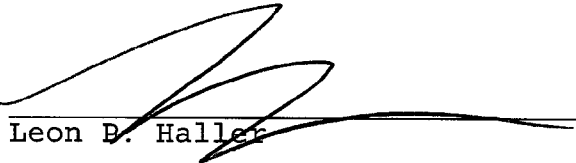
2. Deed from John F. Patterson dated May 16, 1996 and recorded May 24, 1996 in the Recorder of Deeds Office in and for Clearfield County, Pennsylvania, in Deed Book 1760, Page 537, to Dean K. Rowles.

EXHIBIT "B"

VERIFICATION

I verify that the statements made in the foregoing Complaint are true and correct.

I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.


Leon B. Haller

Dated: August 21, 2002