

02-1734-CD  
COUNTRYWIDE HOME LOANS, INC. vs. DANA S. [REDACTED], et al.

FEDERMAN AND PHELAN, LLP  
By: Frank Federman, Esquire  
Identification No. 12248  
One Penn Center Plaza  
Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

Attorney for Plaintiff

Countrywide Home Loans, Inc.  
7105 Corporate Drive  
Plano, TX 75024-3632

: Court of Common Pleas

: Civil Division

v.

: Clearfield County

: Term

Dana Steele  
Or Occupants  
431 Pifer Street  
Dubois, PA 15801

: No. 02-1734-CD

:

CIVIL ACTION - EJECTMENT - 3020  
NOTICE

Please be advised that this firm is a debt collector attempting to collect a debt. Any information received will be used for that purpose. If you have previously received a discharge in bankruptcy and this debt was not reaffirmed, this correspondence is not and should not be construed to be an attempt to collect a debt, but only enforcement of a lien against property.

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 (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 and 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.

CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
(814) 765-2641

**FILED**

01/11/43 BA PL 85.00  
NOV 06 2002

William A. Shaw  
Prothonotary

1. Plaintiff is Countrywide Home Loans, Inc.
2. Defendant is Dana Steele and Or Occupants.
3. Plaintiff is the owner of premises located at 431 Pifer Street, Dubois, PA 15801, a legal description of which is attached.
4. Plaintiff became owner of said premises by a Deed from the Sheriff of Clearfield County, which Deed was lodged and settlement made with the Sheriff (Abstract of Title).
5. Plaintiff, by virtue of the above, is the owner of said premises, and is entitled to possession thereof. The defendant is occupying the said premises without right and so far as the plaintiff is informed, without claim of title.
6. Plaintiff has demanded possession of the said premises from the said defendant who has refused to deliver up possession of same.

WHEREFORE, plaintiff seeks to recover possession of said premises.

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

ALL that message or parcel of land situate, lying and being in the City of Du Bois, Clearfield County, Pennsylvania, and known as Lot No. 148 in the Plan of H. S. Knarr's Addition to said City of Du Bois, and being bounded and described as follows, to wit:

**BEGINNING** at a post at corner formed by the intersection of the Easterly side of Pifer Street with the Southerly side of an alley (first alley South of Shaffer Avenue); thence South 55-1/2 degrees East by line of said alley, 150 feet, more or less, to a post at an alley; thence South 31 degrees West by line of said alley, 50 feet, more or less, to a post at corner of Lot No. 149; thence North 55-1/2 degrees West by line of said Lot No. 149, a distance of 150 feet, more or less, to a post at Pifer Street; thence North 31

degrees East by line of said Pifer Street, 50 feet, more or less, to a post at an alley, the place of beginning, having erected thereon a two story framed residential dwelling with detached garage.

**BEING** the same premises conveyed to Deposit Bank by deed of Chester A. Hawkins, High Sheriff of the County of Clearfield and the State of Pennsylvania, recorded on January 22, 1999 in Clearfield County Deed and Record Book as Instrument No. 199901095.

**UNDER AND SUBJECT, NEVERTHELESS**, to all exceptions, reservations and restrictions contained in prior deeds of conveyance.

**AND** the said grantor will **SPECIALLY WARRANT AND FOREVER DEFEND** the property hereby conveyed.

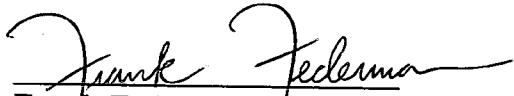
**IN WITNESS WHEREOF**, said grantor has caused this Deed to be signed by its President or a Vice President, and also by its Secretary, or by an Assistant Secretary, or by its Treasurer, or by an Assistant Treasurer, and its Corporate Seal to be hereunto affixed, the day and year first above written.

PREMISES BEING ON 431 PIFER STREET

## VERIFICATION

Frank Federman, Esquire hereby states that he is the Attorney for the Plaintiff in this matter, that Plaintiff is outside the jurisdiction of the court and/or the verification could not be obtained within the time allowed for the filing of the pleading, that he is authorized to take this Verification, pursuant to Pa. R.C.P. 1024 (c) and that the statements made in the foregoing Civil Action in Ejectment are true and correct to the best of his knowledge, information and belief. Furthermore, it is counsel's intention to substitute a verification from Plaintiff as soon as it is received by counsel.

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

  
Frank Federman, Esquire  
Attorney for Plaintiff

Date: 11/5/02

FILED

NOV 06 2002

William A. Shaw  
Prothonotary  
*acc to att*  
*acc to sheriff*

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

Sheriff Docket # 13282

COUNTRYWIDE HOME LOANS, INC.

02-1734-CD

VS.

STEELE, DANA

COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

NOW NOVEMBER 13, 2002 AT 11:35 AM EST SERVED THE WITHIN COMPLAINT  
IN EJECTMENT ON DANA STEELE or Occupants, DEFENDANT AT RESIDENCE,  
431 PIFER ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO  
DANA STEELE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN  
EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: MCCLEARY/NEVLING.

**Return Costs**

Cost Description

30.35 SHFF. HAWKINS PAID BY: ATTY.

10.00 SURCHARGE PAID BY: ATTY.

**FILED**

013:59-01  
JAN 27 2003

William A. Shaw  
Prothonotary

*ES*

Sworn to Before Me This

27<sup>th</sup> Day Of Jan. 2003

*William A. Shaw*

WILLIAM A. SHAW  
Prothonotary

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

So Answers,

*Chester A. Hawkins*

Chester A. Hawkins  
Sheriff

**FEDERMAN AND PHELAN, LLP**

By: Frank Federman, Esquire I.D. No. 12248  
Lawrence T. Phelan, Esquire I.D. No. 32227  
Francis S. Hallinan, Esquire I.D. No. 62695  
One Penn Center at Suburban Station  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Attorney for Plaintiff

**COUNTRYWIDE HOME LOANS, INC**

**Plaintiff**

**vs.**

**Court of Common Pleas  
CLEARFIELD County  
No. 02-1734-CD**

**DANA STEELE OR OCCUPANTS**

**Defendant(s)**

**PRAECIPE TO WITHDRAW COMPLAINT, WITHOUT PREJUDICE,  
AND DISCONTINUE AND END**

TO THE PROTHONOTARY:

Kindly withdraw the complaint filed in the instant matter, without prejudice, and mark this case discontinued and ended, upon payment of your costs only.

3/26/03  
Date

Frank Federman  
Frank Federman, Esquire  
Lawrence T. Phelan, Esquire  
Francis S. Hallinan, Esquire  
Attorneys for Plaintiff

**FILED**

MAR 31 2003

William A. Shaw  
Prothonotary



FILED

NO  
CC

M 13120 467  
MAR 31 2003

Disc. to Federman  
copy to CIA  
KX

William A. Shaw  
Prothonotary

FILED

MAR 31 2003

U.S. DEPT. OF JUSTICE  
RECORDS SECTION

COPY

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Countrywide Home Loans, Inc.

Vs.

No. 2002-01734-CD

Dana Steele or  
Occupants

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA  
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on March 31, 2003, marked:

Discontinued and Ended without prejudice

Record costs in the sum of \$85.00 have been paid in full by Frank Federman, Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 31st day of March A.D. 2003.

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William A. Shaw, Prothonotary