

02-1734-CD
COUNTRYWIDE HOME LOANS, INC. vs. DANA S.
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

: Clearfield County

: Term

: No. 02-1734-CD

v.
Dana Steele
Or Occupants
431 Pifer Street
Dubois, PA 15801

:

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 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.

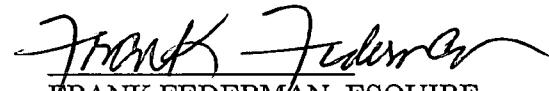
CLEARFIELD COUNTY
DAVID S. MEHOLICK, COURT ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
(814) 765-2641

FILED
01/11/03 BA pg 85-50
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 messuage 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. Knapp'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
Basterly 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. 139901095.

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.

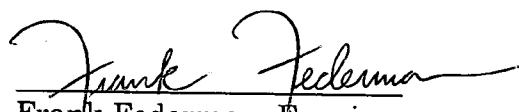
IN WITNESS WHEREOF, said grantor has caused this Deed to
be signed by its President or a Vice President, and also by its
Secretary, or by an Assistant Secretary, or by its Treasurer, or by
an Assistant Treasurer, and its Corporate Seal to be hereunto
affixed, the day and year first above written.

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, ^{acc to stt}
Prothonotary
/ acts of 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

Sworn to Before Me This

27th Day Of Jan. 2003

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

So Answers,

Chester Hawkins
by Marilyn Hamm
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

MAR 13 2003 Disc. to Federman

MAR 3 12003 copy to CIA

cc

RK

William A. Shaw
Prothonotary

RECEIVED
MAY 1 2003

U.S. DISTRICT COURT
for the District of Columbia

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.

William A. Shaw, Prothonotary