

WELLS FARGO HOME MORTGAGE, INC.  
VS.  
WILLIAM A. AND CATHY J. TINKER

2003-183-CD

FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQ., Id. No. 12248  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

WELLS FARGO HOME MORTGAGE, INC.  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

Plaintiff

v.

WILLIAM A. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

CATHY J. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

Defendant(s)

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**NOTICE**

**\*\*THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED 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 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.

*March 5, 2003*  
Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.  
*[Signature]*  
Deputy Prothonotary

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

Loan #: 8291260

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

TERM

NO. 2003-183-CP

CLEARFIELD COUNTY

**FILED**

**FEB 11 2003**

*M/12/00/L*  
William A. Shaw

Prothonotary/Clerk of Courts  
*2 sent to Shaw*

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977), DEFENDANT(S) MAY DISPUTE THE VALIDITY OF THE DEBT OR ANY PORTION THEREOF. IF DEFENDANT(S) DO SO IN WRITING WITHIN THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING, COUNSEL FOR PLAINTIFF WILL OBTAIN AND PROVIDE DEFENDANT(S) WITH WRITTEN VERIFICATION THEREOF; OTHERWISE, THE DEBT WILL BE ASSUMED TO BE VALID. LIKEWISE, IF REQUESTED WITHIN THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING, COUNSEL FOR PLAINTIFF WILL SEND DEFENDANT(S) THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR, IF DIFFERENT FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL THE END OF THE THIRTY (30) DAY PERIOD FOLLOWING FIRST CONTACT WITH YOU BEFORE SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH THE LAW PROVIDES THAT YOUR ANSWER TO THIS COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.**

1. Plaintiff is

WELLS FARGO HOME MORTGAGE, INC.  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

2. The name(s) and last known address(es) of the Defendant(s) are:

WILLIAM A. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

CATHY J. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
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who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 11/28/00 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to TOWNE & COUNTRY MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Book Instrument # 200017801. By Assignment of Mortgage recorded 12/1/00 the mortgage was assigned to PLAINTIFF which Assignment is recorded in Assignment of Mortgage Book Instrument # 200017808.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 08/01/2002 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$45,331.78
Interest	2,549.25
07/01/2002 through 02/10/2003 (Per Diem \$11.33)	
Attorney's Fees	850.00
Cumulative Late Charges	119.46
11/28/2000 to 01/01/2003	
Cost of Suit and Title Search	\$ 750.00
Subtotal	\$ 49,600.49
Escrow	
Credit	0.00
Deficit	332.33
Subtotal	\$ 332.33
<b>TOTAL</b>	<b>\$ 49,932.82</b>

7. The attorney's fees 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.

8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 49,932.82, together with interest from 02/10/2003 at the rate of \$11.33 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN AND PHELAN, LLP  
By: Francis S. Hallinan  
FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

ALL those certain pieces or parcels of land, lying and being situate in Brady Township, Clearfield County, Pennsylvania, being bounded and described as follows, to wit:

THE FIRST THEREOF: BEGINNING at an iron pipe corner (Northwestern corner of lot now or formerly of Earl R. Schindley); thence, by lot now or formerly of Schindley, South 27° 32' West 155.0 feet to an iron pipe corner; thence, by land now or formerly of Joseph Raymond Shafer, North 56° 02' East 100.0 feet to an iron pipe corner; thence, still by lands now or formerly of Joseph Raymond Shafer, North 27° 32' East 155.0 feet to an iron pipe corner;

thence, by land now or formerly of Cora Lyons, South 56° 02' West 100.0 feet to place of beginning. CONTAINING 15,402 square feet.

SUBJECT to all exceptions, reservations, conditions, restrictions, easements and rights-of-way as fully as the same are contained in prior deeds, instruments or writings or in any other manner touching or affecting the premises hereby conveyed.

BEING the same premises which were conveyed to Pamela J. Shafer, single, by Deed of Pamela J. Preston, a/k/a Pamela J. Shafer, single, and Curtis L. Preston, single, dated March 17, 1997, and recorded in Clearfield County Deeds and Records Book Vol. 1828, Page 55.

THE SECOND THEREOF: BEGINNING at a set ¾" iron rebar corner, said corner being the northwest corner of the property described herein; thence along land of Dorothy E. Shafer, South 62° 36' 46" East, a distance of 25.98 feet to a set ¾" iron rebar corner; thence along land of Pamela J. Shafer, South 20° 13' 50" West, a distance of 46.07 feet to a set ¾" iron rebar corner; thence along land of Pamela J. Shafer, South 62° 35' 08" East, a distance of 100.18 feet to a set ¾" iron rebar corner; thence along land of David J. and Robyn J. Davis and Dorothy E. Shafer, South 20° 07' 14" West, a distance of 18.40 feet to a set ¾" iron rebar corner; thence along land of Dorothy E. Shafer, North 58° 36' 22" West, a distance of 127.51 feet to a set ¾" iron rebar corner; thence along land of Dorothy E. Shafer, North 20° 07' 14" East, a distance of 55.55 feet to a set ¾" iron rebar corner, the place of beginning.

CONTAINING 0.07 acres and shown as Lot 2 on a plan titled, "Final Subdivision Plan & Lot Consolidation Plan of Dorothy E. Shafer, Brady Township, Clearfield County" as prepared by Hess & Fisher Engineers, Inc., dated May 24, 2000.

The above description was prepared by Hess & Fisher Engineers, Inc., in accordance with a survey performed by them.

BEING a portion of the same premises which were conveyed to Joseph Raymond Shafer and Dorothy E. Shafer, husband and wife, by Deed of Joseph Raymond Shafer and Dorothy E. Shafer, his wife, dated March 29, 1950, and recorded in Clearfield County Deed Book Vol. 404, Page 550. The said Joseph Raymond Shafer having died on January 17, 1996, the same remained unto Dorothy E. Shafer, one of the Grantors herein.

A combined description of the above two (2) parcels is more particularly set forth as follows in accordance with a survey performed by Hess & Fisher Engineers, Inc.:

BEGINNING at a set ¾" iron rebar corner, said corner being the northwest corner of the property described herein; thence along the southern line of a

private driveway, South 63° 10' 02" East, a distance of 100.11 feet to a set ¾" iron rebar; thence along land now or formerly of David J. and Robyn J. Davis, South 20° 17' 29" West, a distance of 162.99 feet to a set ¾" iron rebar corner; thence along land now or formerly of David J. and Robyn J. Davis and Dorothy E. Shafer, South 20° 07' 14" West, a distance of 18.41 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 58° 36' 22" West, a distance of 127.51 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 20° 07' 14" East, a distance of 55.55 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, South 62° 35' 08" East, a distance of 25.98 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 20° 17' 29" East, a distance of 115.91 feet to a set ¾" iron rebar, the place of beginning.

CONTAINING 0.44 acres as shown on the attached map as prepared by Hess & Fisher Engineers, Inc., dated November 13, 2000, titled, "Plat of Land of Pamela J. Shafer, Brady Township, Clearfield County."

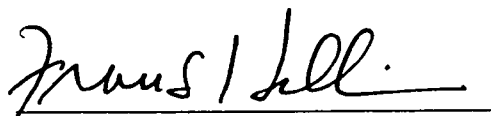
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PREMISES BEING: RR 4 BOX 375, A/K/A RD 4 BOX 375

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for 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 make this verification pursuant to Pa. R. C. P. 1024 ( c ), and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of its 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.

A handwritten signature in cursive script, reading "Francis S. Hallinan", written over a horizontal line.

Francis S. Hallinan, Esquire  
Attorney for Plaintiff

DATE: 2-10-03



FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQ., Id. No. 12248  
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*[Signature]*  
Deputy Prothonotary

Loan #: 8291260

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

TERM

NO. 2003-183-CP

CLEARFIELD COUNTY

**FILED**

**FEB 11 2003**

*M/12/00/L*  
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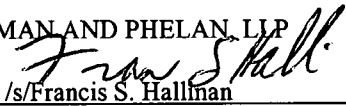
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FEDERMAN AND PHELAN, LLP  
By:   
/s/Francis S. Hallinan  
FRANK FEDERMAN, ESQUIRE  
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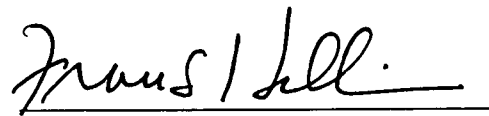
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Francis S. Hallinan, Esquire  
Attorney for Plaintiff

DATE: 2-10-03

21 May 03 Document  
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*William A. Shaw*  
Deputy Prothonotary

FILED

FEB 11 2003

William A. Shaw  
Prothonotary/Clerk of Courts



FEDERMAN AND PHELAN  
BY: FRANK FEDERMAN, ESQUIRE  
Identification No. 12248  
1617 John F. Kennedy Boulevard Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Attorney for Plaintiff

WELLS FARGO HOME MORTGAGE,  
INC.

: COURT OF COMMON PLEAS

Plaintiff

: CIVIL DIVISION

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WILLIAM A. TINKER AND  
CATHY J. TINKER

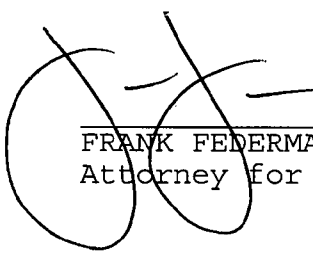
: No. 2003-183

Defendants

PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure  
with reference to the above captioned matter.

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

Date: February 26, 2003

TRS, Svc Dept.

FILED

MAR 05 2003

M/2:45/1m

William A. Shaw

Prothonotary/Clerk of Courts

W. Shaw

1 REINSTATE TO APPR

2 REINSTATE TO SHAW

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13654

WELLS FARGO HOME MORTGAGE INC.

03-183-CD

VS.

TINKER, WILLIAM A. & CATHY J.

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW MARCH 10, 2003 RETURN THE WITHIN COMPLAINT IN MORTGAGE  
FORECLOSURE "NOT SERVED AT DIRECTION OF ATTORNEY".

Return Costs

Cost	Description
9.00	SHFF. HAWKINS PAID BY: ATTY

**FILED**  
9:52 AM  
MAR 11 2003

William A. Shaw  
Prothonotary

Sworn to Before Me This

16<sup>th</sup> Day Of March 2003

William A. Shaw

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

GA

So Answers,

Chester A. Hawkins

Chester A. Hawkins  
Sheriff

FEDERMAN AND PHELAN, LLP

By: FRANK FEDERMAN, ESQ., Id. No. 12248

LAWRENCE T. PHELAN, ESQ., Id. No. 32227

FRANCIS S. HALLINAN, ESQ., Id. No. 62695

ONE PENN CENTER PLAZA, SUITE 1400

PHILADELPHIA, PA 19103

(215) 563-7000

WELLS FARGO HOME MORTGAGE, INC.

3476 STATEVIEW BOULEVARD

FORT MILL, SC 29715

Plaintiff

v.

**WILLIAM A. TINKER**

RR 4 BOX 375

A/K/A RD 4 BOX 375

DUBOIS, PA 15801

CATHY J. TINKER

RR 4 BOX 375

A/K/A RD 4 BOX 375

DUBOIS, PA 15801

Defendant(s)

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**NOTICE**

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We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record  
FEDERMAN AND PHELAN

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

FEDERMAN AND  
ATTORNEY FILE  
PLEASE RETURN

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

TERM

NO. 2003 - 183 - CP

CLEARFIELD COUNTY

FEDERMAN AND PHELAN  
ATTORNEY FILE COPY  
I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

MAR 05 2003

Attest.

William A. Tinker  
Prothonotary/  
Clerk of Courts

March 5, 2003  
Reinstated/Reissued to  
for service. Issued to Sheriff/Attorney  
Deputy Prothonotary

FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQ., Id. No. 12248  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
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ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

WELLS FARGO HOME MORTGAGE, INC.  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

TERM

Plaintiff

NO.

v.

CLEARFIELD COUNTY

WILLIAM A. TINKER  
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A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

CATHY J. TINKER  
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CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
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IF THIS IS THE FIRST NOTICE THAT YOU HAVE  
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:

PURSUANT TO THE FAIR DEBT COLLECTION  
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),  
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF  
THE DEBT OR ANY PORTION THEREOF. IF  
DEFENDANT(S) DO SO IN WRITING WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
OBTAIN AND PROVIDE DEFENDANT(S) WITH  
WRITTEN VERIFICATION THEREOF;  
OTHERWISE, THE DEBT WILL BE ASSUMED TO  
BE VALID. LIKEWISE, IF REQUESTED WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
SEND DEFENDANT(S) THE NAME AND ADDRESS  
OF THE ORIGINAL CREDITOR, IF DIFFERENT  
FROM ABOVE.

THE LAW DOES NOT REQUIRE US TO WAIT  
UNTIL THE END OF THE THIRTY (30) DAY  
PERIOD FOLLOWING FIRST CONTACT WITH  
YOU BEFORE SUING YOU TO COLLECT THIS  
DEBT. EVEN THOUGH THE LAW PROVIDES  
THAT YOUR ANSWER TO THIS COMPLAINT IS  
TO BE FILED IN THIS ACTION WITHIN TWENTY  
(20) DAYS, YOU MAY OBTAIN AN EXTENSION OF  
THAT TIME. FURTHERMORE, NO REQUEST  
WILL BE MADE TO THE COURT FOR A  
JUDGMENT UNTIL THE EXPIRATION OF THIRTY  
(30) DAYS AFTER YOU HAVE RECEIVED THIS  
COMPLAINT. HOWEVER, IF YOU REQUEST  
PROOF OF THE DEBT OR THE NAME AND  
ADDRESS OF THE ORIGINAL CREDITOR WITHIN  
THE THIRTY (30) DAY PERIOD THAT BEGINS  
UPON YOUR RECEIPT OF THIS COMPLAINT,  
THE LAW REQUIRES US TO CEASE OUR  
EFFORTS (THROUGH LITIGATION OR  
OTHERWISE) TO COLLECT THE DEBT UNTIL  
WE MAIL THE REQUESTED INFORMATION TO  
YOU. YOU SHOULD CONSULT AN ATTORNEY  
FOR ADVICE CONCERNING YOUR RIGHTS AND  
OBLIGATIONS IN THIS SUIT.

1. Plaintiff is

WELLS FARGO HOME MORTGAGE, INC.  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

2. The name(s) and last known address(es) of the Defendant(s) are:

WILLIAM A. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

CATHY J. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 11/28/00 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to TOWNE & COUNTRY MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Book Instrument # 200017801. By Assignment of Mortgage recorded 12/1/00 the mortgage was assigned to PLAINTIFF which Assignment is recorded in Assignment of Mortgage Book Instrument # 200017808.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 08/01/2002 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$45,331.78
Interest	2,549.25
07/01/2002 through 02/10/2003 (Per Diem \$11.33)	
Attorney's Fees	850.00
Cumulative Late Charges	119.46
11/28/2000 to 01/01/2003	
Cost of Suit and Title Search	<u>\$ 750.00</u>
Subtotal	\$ 49,600.49
Escrow	
Credit	0.00
Deficit	332.33
Subtotal	<u>\$ 332.33</u>
<b>TOTAL</b>	<b>\$ 49,932.82</b>

7. The attorney's fees 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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 49,932.82, together with interest from 02/10/2003 at the rate of \$11.33 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN AND PHELAN, LLP

By: /s/Francis S. Hallinan  
FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

ALL those certain pieces or parcels of land, lying and being situate in Brady Township, Clearfield County, Pennsylvania, being bounded and described as follows, to wit:

THE FIRST THEREOF: BEGINNING at an iron pipe corner (Northwestern corner of lot now or formerly of Earl R. Schindley); thence, by lot now or formerly of Schindley, South 27° 32' West 155.0 feet to an iron pipe corner; thence, by land now or formerly of Joseph Raymond Shafer, North 56° 02' East 100.0 feet to an iron pipe corner; thence, still by lands now or formerly of Joseph Raymond Shafer, North 27° 32' East 155.0 feet to an iron pipe corner;

thence, by land now or formerly of Cora Lyons, South 56° 02' West 100.0 feet to place of beginning. CONTAINING 15,402 square feet.

SUBJECT to all exceptions, reservations, conditions, restrictions, easements and rights-of-way as fully as the same are contained in prior deeds, instruments or writings or in any other manner touching or affecting the premises hereby conveyed.

BEING the same premises which were conveyed to Pamela J. Shafer, single, by Deed of Pamela J. Preston, a/k/a Pamela J. Shafer, single, and Curtis L. Preston, single, dated March 17, 1997, and recorded in Clearfield County Deeds and Records Book Vol. 1828, Page 55.

THE SECOND THEREOF: BEGINNING at a set ¾" iron rebar corner, said corner being the northwest corner of the property described herein; thence along land of Dorothy E. Shafer, South 62° 36' 46" East, a distance of 25.98 feet to a set ¾" iron rebar corner; thence along land of Pamela J. Shafer, South 20° 13' 50" West, a distance of 46.07 feet to a set ¾" iron rebar corner; thence along land of Pamela J. Shafer, South 62° 35' 08" East, a distance of 100.18 feet to a set ¾" iron rebar corner; thence along land of David J. and Robyn J. Davis and Dorothy E. Shafer, South 20° 07' 14" West, a distance of 18.40 feet to a set ¾" iron rebar corner; thence along land of Dorothy E. Shafer, North 58° 36' 22" West, a distance of 127.51 feet to a set ¾" iron rebar corner; thence along land of Dorothy E. Shafer, North 20° 07' 14" East, a distance of 55.55 feet to a set ¾" iron rebar corner, the place of beginning.

CONTAINING 0.07 acres and shown as Lot 2 on a plan titled, "Final Subdivision Plan & Lot Consolidation Plan of Dorothy E. Shafer, Brady Township, Clearfield County" as prepared by Hess & Fisher Engineers, Inc., dated May 24, 2000.

The above description was prepared by Hess & Fisher Engineers, Inc., in accordance with a survey performed by them.

BEING a portion of the same premises which were conveyed to Joseph Raymond Shafer and Dorothy E. Shafer, husband and wife, by Deed of Joseph Raymond Shafer and Dorothy E. Shafer, his wife, dated March 29, 1950, and recorded in Clearfield County Deed Book Vol. 404, Page 550. The said Joseph Raymond Shafer having died on January 17, 1997, the same remained unto Dorothy E. Shafer, one of the Grantors herein.

A combined description of the above two (2) parcels is more particularly set forth as follows in accordance with a survey performed by Hess & Fisher Engineers, Inc.:

BEGINNING at a set ¾" iron rebar corner, said corner being the northwest



private driveway, South 63° 10' 02" East, a distance of 100.11 feet to a set ¾" iron rebar; thence along land now or formerly of David J. and Robyn J. Davis, South 20° 17' 29" West, a distance of 162.99 feet to a set ¾" iron rebar corner; thence along land now or formerly of David J. and Robyn J. Davis and Dorothy E. Shafer, South 20° 07' 14" West, a distance of 18.41 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 58° 36' 22" West, a distance of 127.51 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 20° 07' 14" East, a distance of 55.55 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, South 62° 35' 08" East, a distance of 25.98 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 20° 17' 29" East, a distance of 115.91 feet to a set ¾" iron rebar, the place of beginning.

CONTAINING 0.44 acres as shown on the attached map as prepared by Hess & Fisher Engineers, Inc., dated November 13, 2000, titled, "Plat of Land of Pamela J. Shafer, Brady Township, Clearfield County."

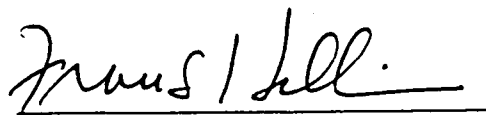
BEING a combined description of the same premises which were conveyed to Pamela J. Shafer, single, by Deed of Pamela J. Preston, a/k/a Pamela J. Shafer, single, and Curtis L. Preston, single, dated March 17, 1997, and recorded in Clearfield County Deeds and Records Book Vol. 1828, Page 55, and a portion of premises conveyed to Joseph Raymond Shafer and Dorothy E. Shafer, husband and wife, by Deed of Joseph Raymond Shafer and Dorothy E. Shafer, his wife, dated March 29, 1950, and recorded in Clearfield County Deed Book Vol. 404, Page 550, as aforesaid.

PREMISES BEING: RR 4 BOX 375, A/K/A RD 4 BOX 375

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for 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 make this verification pursuant to Pa. R. C. P. 1024 ( c ), and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of its 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.

A handwritten signature in dark ink, appearing to read "Francis S. Hallinan", is written over a horizontal line.

Francis S. Hallinan, Esquire  
Attorney for Plaintiff

DATE: 2-10-03

FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQ., Id. No. 12248  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

WELLS FARGO HOME MORTGAGE, INC.  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

Plaintiff

v.

WILLIAM A. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

CATHY J. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

Defendant(s)

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

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CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT ADMINISTRATOR  
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ATTORNEY FOR PLAINTIFF  
COURT OF COMMON PLEAS  
CIVIL DIVISION

TERM

NO. 2003 - 183 - CP

CLEARFIELD COUNTY

FEDERMAN AND PHELAN  
ATTORNEY FILE COPY

I hereby certify this to be a true  
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MAR 05 2003

Attest.

*William L. Shaw*  
Prothonotary/  
Clerk of Courts

March 5, 2003 Document  
Reinstated/Referred to Sheriff/Attorney  
for service

FEDERMAN AND  
ATTORNEY FILE  
PLEASE RETURN

FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQ., Id. No. 12248  
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ATTORNEY FOR PLAINTIFF

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TERM

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THE LAW DOES NOT REQUIRE US TO WAIT UNTIL THE END OF THE THIRTY (30) DAY PERIOD FOLLOWING FIRST CONTACT WITH YOU BEFORE SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH THE LAW PROVIDES THAT YOUR ANSWER TO THIS COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.

1. Plaintiff is

WELLS FARGO HOME MORTGAGE, INC.  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

2. The name(s) and last known address(es) of the Defendant(s) are:

WILLIAM A. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

CATHY J. TINKER  
RR 4 BOX 375  
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who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 11/28/00 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to TOWNE & COUNTRY MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Book Instrument # 200017801. By Assignment of Mortgage recorded 12/1/00 the mortgage was assigned to PLAINTIFF which Assignment is recorded in Assignment of Mortgage Book Instrument # 200017808.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 08/01/2002 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

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<b>TOTAL</b>	<b>\$ 49,932.82</b>

7. The attorney's fees 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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 49,932.82, together with interest from 02/10/2003 at the rate of \$11.33 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN AND PHELAN, LLP

By: /s/Francis S. Hallinan  
FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

ALL those certain pieces or parcels of land, lying and being situate in Brady Township, Clearfield County, Pennsylvania, being bounded and described as follows, to wit:

THE FIRST THEREOF: BEGINNING at an iron pipe corner (Northwestern corner of lot now or formerly of Earl R. Schindley); thence, by lot now or formerly of Schindley, South 27° 32' West 155.0 feet to an iron pipe corner; thence, by land now or formerly of Joseph Raymond Shafer, North 56° 02' East 100.0 feet to an iron pipe corner; thence, still by lands now or formerly of Joseph Raymond Shafer, North 27° 32' East 155.0 feet to an iron pipe corner;

thence, by land now or formerly of Cora Lyons, South 56° 02' West 100.0 feet to place of beginning. CONTAINING 15,402 square feet.

SUBJECT to all exceptions, reservations, conditions, restrictions, easements and rights-of-way as fully as the same are contained in prior deeds, instruments or writings or in any other manner touching or affecting the premises hereby conveyed.

BEING the same premises which were conveyed to Pamela J. Shafer, single, by Deed of Pamela J. Preston, a/k/a Pamela J. Shafer, single, and Curtis L. Preston, single, dated March 17, 1997, and recorded in Clearfield County Deeds and Records Book Vol. 1828, Page 55.

THE SECOND THEREOF: BEGINNING at a set ¾" iron rebar corner, said corner being the northwest corner of the property described herein; thence along land of Dorothy E. Shafer, South 62° 36' 46" East, a distance of 25.98 feet to a set ¾" iron rebar corner; thence along land of Pamela J. Shafer, South 20° 13' 50" West, a distance of 46.07 feet to a set ¾" iron rebar corner; thence along land of Pamela J. Shafer, South 62° 35' 08" East, a distance of 100.18 feet to a set ¾" iron rebar corner; thence along land of David J. and Robyn J. Davis and Dorothy E. Shafer, South 20° 07' 14" West, a distance of 18.40 feet to a set ¾" iron rebar corner; thence along land of Dorothy E. Shafer, North 58° 36' 22" West, a distance of 127.51 feet to a set ¾" iron rebar corner; thence along land of Dorothy E. Shafer, North 20° 07' 14" East, a distance of 55.55 feet to a set ¾" iron rebar corner, the place of beginning.

CONTAINING 0.07 acres and shown as Lot 2 on a plan titled, "Final Subdivision Plan & Lot Consolidation Plan of Dorothy E. Shafer, Brady Township, Clearfield County" as prepared by Hess & Fisher Engineers, Inc., dated May 24, 2000.

The above description was prepared by Hess & Fisher Engineers, Inc., in accordance with a survey performed by them.

BEING a portion of the same premises which were conveyed to Joseph Raymond Shafer and Dorothy E. Shafer, husband and wife, by Deed of Joseph Raymond Shafer and Dorothy E. Shafer, his wife, dated March 29, 1950, and recorded in Clearfield County Deed Book Vol. 404, Page 550. The said Joseph Raymond Shafer having died on January 17, 1992, the same remained unto Dorothy E. Shafer, one of the Grantors herein.

A combined description of the above two (2) parcels is more particularly set forth as follows in accordance with a survey performed by Hess & Fisher Engineers, Inc.:

BEGINNING at a set ¾" iron rebar corner, said corner being the northwest



private driveway, South 63° 10' 02" East, a distance of 100.11 feet to a set ¾" iron rebar; thence along land now or formerly of David J. and Robyn J. Davis, South 20° 17' 29" West, a distance of 162.99 feet to a set ¾" iron rebar corner; thence along land now or formerly of David J. and Robyn J. Davis and Dorothy E. Shafer, South 20° 07' 14" West, a distance of 18.41 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 58° 36' 22" West, a distance of 127.51 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 20° 07' 14" East, a distance of 55.55 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, South 62° 35' 08" East, a distance of 25.98 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 20° 17' 29" East, a distance of 115.91 feet to a set ¾" iron rebar, the place of beginning.

CONTAINING 0.44 acres as shown on the attached map as prepared by Hess & Fisher Engineers, Inc., dated November 13, 2000, titled, "Plat of Land of Pamela J. Shafer, Brady Township, Clearfield County."

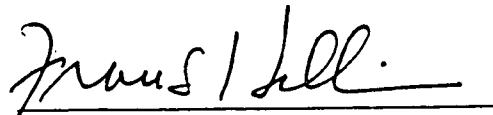
BEING a combined description of the same premises which were conveyed to Pamela J. Shafer, single, by Deed of Pamela J. Preston, a/k/a Pamela J. Shafer, single, and Curtis L. Preston, single, dated March 17, 1997, and recorded in Clearfield County Deeds and Records Book Vol. 1828, Page 55, and a portion of premises conveyed to Joseph Raymond Shafer and Dorothy E. Shafer, husband and wife, by Deed of Joseph Raymond Shafer and Dorothy E. Shafer, his wife, dated March 29, 1950, and recorded in Clearfield County Deed Book Vol. 404, Page 550, as aforesaid.

PREMISES BEING: RR 4 BOX 375, A/K/A RD 4 BOX 375

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for 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 make this verification pursuant to Pa. R. C. P. 1024 ( c ), and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of its 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.

A handwritten signature in dark ink, appearing to read "Francis S. Hallinan", is written over a horizontal line.

Francis S. Hallinan, Esquire  
Attorney for Plaintiff

DATE: 2-10-03

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13654

WELLS FARGO HOME MORTGAGE INC.

03-183-CD

VS.

TINKER, WILLIAM A. & CATHY J.

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW FEBRUARY 18, 2003 AT 11:45 AM EST SERVED THE WITHIN COMPLAINT  
IN MORTGAGE FORECLOSURE ON CATHY J. TINKER, DEFENDANT AT RESIDENCE,  
RD#4 BOX 465, APT C, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY  
HANDING TO CATHY J. TINKER A TRUE AND ATTESTED COPY OF THE ORIGINAL  
COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE  
CONTENTS THEREOF.  
SERVED BY: COUDRIET/RYEN

NOW MARCH 10, 2003 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN  
THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO  
WILLIAM A. TINKER, DEFENDANT. NEW ADDRESS: L.S.C.D., P.O.O. BOX 999,  
BUTNER, NC. 27509-0999 (INCARCERATED).

Return Costs

Cost	Description
45.35	SHFF. HAWKINS PAID BY: ATTY
20.00	SURCHARGE PAID BY: ATTY.

**FILED**  
9:50 *ll*  
MAR 11 2003

William A. Shaw  
Prothonotary

Sworn to Before Me This

*11th* Day Of *March* 2003

*William A. Shaw ll*

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

So Answers,

*Chester A. Hawkins*  
*by Mailey Harris*  
Chester A. Hawkins  
Sheriff

FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQ., Id. No. 12248  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

WELLS FARGO HOME MORTGAGE, INC.  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

Plaintiff

v.

WILLIAM A. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

CATHY J. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

TERM

NO. 2003-183-C7

CLEARFIELD COUNTY

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

FEB 11 2003

Attest.

*William A. Phelan*  
Prothonotary/  
Clerk of Courts

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**NOTICE**

**\*\*THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED 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 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.

**We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record  
FEDERMAN AND PHELAN**

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

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977), DEFENDANT(S) MAY DISPUTE THE VALIDITY OF THE DEBT OR ANY PORTION THEREOF. IF DEFENDANT(S) DO SO IN WRITING WITHIN THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING, COUNSEL FOR PLAINTIFF WILL OBTAIN AND PROVIDE DEFENDANT(S) WITH WRITTEN VERIFICATION THEREOF; OTHERWISE, THE DEBT WILL BE ASSUMED TO BE VALID. LIKEWISE, IF REQUESTED WITHIN THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING, COUNSEL FOR PLAINTIFF WILL SEND DEFENDANT(S) THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR, IF DIFFERENT FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL THE END OF THE THIRTY (30) DAY PERIOD FOLLOWING FIRST CONTACT WITH YOU BEFORE SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH THE LAW PROVIDES THAT YOUR ANSWER TO THIS COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.**

1. Plaintiff is

WELLS FARGO HOME MORTGAGE, INC.  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

2. The name(s) and last known address(es) of the Defendant(s) are:

WILLIAM A. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

CATHY J. TINKER  
RR 4 BOX 375  
A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 11/28/00 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to TOWNE & COUNTRY MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Book Instrument # 200017801. By Assignment of Mortgage recorded 12/1/00 the mortgage was assigned to PLAINTIFF which Assignment is recorded in Assignment of Mortgage Book Instrument # 200017808.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 08/01/2002 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$45,331.78
Interest	2,549.25
07/01/2002 through 02/10/2003 (Per Diem \$11.33)	
Attorney's Fees	850.00
Cumulative Late Charges	119.46
11/28/2000 to 01/01/2003	
Cost of Suit and Title Search	<u>\$ 750.00</u>
Subtotal	\$ 49,600.49
Escrow	
Credit	0.00
Deficit	332.33
Subtotal	<u>\$ 332.33</u>
<b>TOTAL</b>	<b>\$ 49,932.82</b>

7. The attorney's fees 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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 49,932.82, together with interest from 02/10/2003 at the rate of \$11.33 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN AND PHELAN, LLP

By: /s/Francis S. Hallinan  
FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

ALL those certain pieces or parcels of land, lying and being situate in Brady Township, Clearfield County, Pennsylvania, being bounded and described as follows, to wit:

THE FIRST THEREOF: BEGINNING at an iron pipe corner (Northwestern corner of lot now or formerly of Earl R. Schindley); thence, by lot now or formerly of Schindley, South 27° 32' West 155.0 feet to an iron pipe corner; thence, by land now or formerly of Joseph Raymond Shafer, North 56° 02' East 100.0 feet to an iron pipe corner; thence, still by lands now or formerly of Joseph Raymond Shafer, North 27° 32' East 155.0 feet to an iron pipe corner;

thence, by land now or formerly of Cora Lyons, South 56° 02' West 100.0 feet to place of beginning. CONTAINING 15,402 square feet.

SUBJECT to all exceptions, reservations, conditions, restrictions, easements and rights-of-way as fully as the same are contained in prior deeds, instruments or writings or in any other manner touching or affecting the premises hereby conveyed.

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THE SECOND THEREOF: BEGINNING at a set ¾" iron rebar corner, said corner being the northwest corner of the property described herein; thence along land of Dorothy E. Shafer, South 62° 36' 46" East, a distance of 25.98 feet to a set ¾" iron rebar corner; thence along land of Pamela J. Shafer, South 20° 13' 50" West, a distance of 46.07 feet to a set ¾" iron rebar corner; thence along land of Pamela J. Shafer, South 62° 35' 08" East, a distance of 100.18 feet to a set ¾" iron rebar corner; thence along land of David J. and Robyn J. Davis and Dorothy E. Shafer, South 20° 07' 14" West, a distance of 18.40 feet to a set ¾" iron rebar corner; thence along land of Dorothy E. Shafer, North 58° 36' 22" West, a distance of 127.51 feet to a set ¾" iron rebar corner; thence along land of Dorothy E. Shafer, North 20° 07' 14" East, a distance of 55.55 feet to a set ¾" iron rebar corner, the place of beginning.

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The above description was prepared by Hess & Fisher Engineers, Inc., in accordance with a survey performed by them.

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private driveway, South 63° 10' 02" East, a distance of 100.11 feet to a set ¾" iron rebar; thence along land now or formerly of David J. and Robyn J. Davis, South 20° 17' 29" West, a distance of 162.99 feet to a set ¾" iron rebar corner; thence along land now or formerly of David J. and Robyn J. Davis and Dorothy E. Shafer, South 20° 07' 14" West, a distance of 18.41 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 58° 36' 22" West, a distance of 127.51 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 20° 07' 14" East, a distance of 55.55 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, South 62° 35' 08" East, a distance of 25.98 feet to a set ¾" iron rebar; thence along land of Dorothy E. Shafer, North 20° 17' 29" East, a distance of 115.91 feet to a set ¾" iron rebar, the place of beginning.

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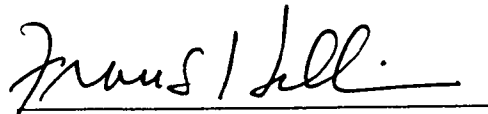
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PREMISES BEING: RR 4 BOX 375, A/K/A RD 4 BOX 375

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for 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 make this verification pursuant to Pa. R. C. P. 1024 ( c ), and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of its knowledge, information and belief. Furthermore, it is counsel's intention to substitute a verification from Plaintiff as soon as it is received by counsel.

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A handwritten signature in black ink, appearing to read "Francis S. Hallinan", written over a horizontal line.

Francis S. Hallinan, Esquire  
Attorney for Plaintiff

DATE: 2-10-03

FEDERMAN AND PHELAN  
BY: FRANK FEDERMAN, ESQUIRE  
Identification No. 12248  
1617 John F. Kennedy Boulevard Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Attorney for Plaintiff

WELLS FARGO HOME MORTGAGE,  
INC.

: COURT OF COMMON PLEAS

Plaintiff

: CIVIL DIVISION

vs.

: Clearfield County

WILLIAM A. TINKER  
CATHY J. TINKER

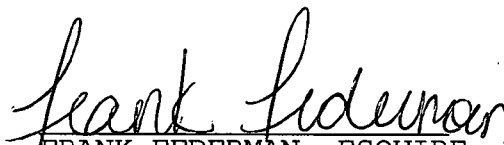
: No. 2003-183-CD

Defendants

**PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE**

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure  
with reference to the above captioned matter.

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

Date: May 16, 2003

CDC, Svc Dept.

**FILED**

MAY 21 2003

William A. Shaw  
Prothonotary

**FILED**

*NO CC*

*M/1:32 PM One Compl. re-instated  
MAY 21 2003 to Atty*

*William A. Shaw Atty Ad. 700  
Prothonotary*

AFFIDAVIT OF SERVICE - CLEARFIELD COUNTY

PLAINTIFF WELLS FARGO HOME  
MORTGAGE, INC.

NO. 2003-183

DEFENDANT WILLIAM A. TINKER  
INMATE # 07009068

TYPE OF ACTION  
XX Mortgage Foreclosure  
XX Civil Action

SERVE AT: LSCI OLD HIGHWAY 75  
BUTNER, NC 27509

SERVED

Served and made known to William A. Tinker  
Defendant on the 12 day of June, 2003, at 2:35  
o'clock, P. M., at FCI  
Butner NC, City in the manner described below:

X Defendant personally served.

Adult family member with whom Defendant(s) reside(s).

Relationship is \_\_\_\_\_  
Adult in charge of Defendant's residence who refused to give  
name/relationship.

Manager/Clerk of place of lodging in which Defendant(s) reside(s)  
Agent or person in charge of Defendant's office or usual place of  
business.

\_\_\_\_\_ and officer of said defendant  
company.

Other: \_\_\_\_\_

I, Rep. E. Newman, a competent adult, being duly sworn according to  
law, depose and state that I personally handed to William Tinker  
a true and correct copy of the mortgage Foreclosure & Civil Action  
issued in the captioned case on the date and at the address indicated  
above.

Sworn to and subscribed  
Before me this \_\_\_\_\_ day  
Of \_\_\_\_\_, 20\_\_\_\_.  
Notary:

Sherrif D. T. Smith

By: Deputy Edward Newman

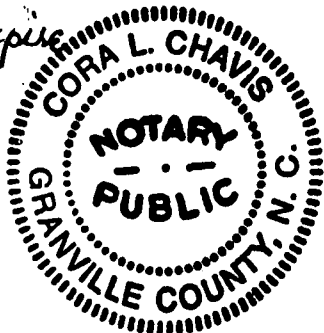
NOT SERVED

On the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock  
\_\_\_\_\_.M., Defendant NOT FOUND because:  
\_\_\_\_\_. Moved \_\_\_\_\_ Unknown \_\_\_\_\_ No Answer \_\_\_\_\_ Vacant  
Other: \_\_\_\_\_

Sworn to and subscribed  
Before me the 12th day  
Of June, 2003.  
Notary: Cora L. Chavis

Commission Expires  
03/18/08

Reed 6/3/03  
pg 5



By: Frank Federman  
ATTORNEY OF PLAINTIFF  
FRANK FEDERMAN, ESQUIRE - I.D.#12248  
Suite 1400  
One Penn Center Plaza at Suburban Station  
Philadelphia, PA 19103-1799  
(215) 563-7000

FILED

SEP 05 2003  
m/12451 K. Cathy Federman  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WELLS FARGO HOME MORTGAGE, INC.  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

No.: 2003-183 -CD

vs.

WILLIAM A. TINKER  
CATHY J. TINKER  
RD 4 BOX 375  
DUBOIS, PA 15801

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

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against WILLIAM A. TINKER and CATHY J. TINKER, 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	\$49,932.82
Interest (2/10/03 to 8/25/03)	<u>2,232.01</u>
<b>TOTAL</b>	<b>\$52,164.83</b>

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

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

Damages are hereby assessed as indicated.

DATE: September 18, 2003

  
PRO PROTHY

MLD

**FILED**

SEP 18 2003

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

WELLS FARGO HOME MORTGAGE, INC.

Plaintiff

vs.

No.: 2003-183

WILLIAM A. TINKER  
CATHY J. TINKER

Defendant(s)

Notice is given that a Judgment in the above captioned matter has been entered  
against you on September 18, 2003.

By: Will. H. Hargis DEPUTY

If you have any questions concerning this matter please contact:

Frank Federman  
FRANK FEDERMAN, ESQUIRE  
Attorney or Party Filing  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

**\*\*THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.\*\***

FEDERMAN AND PHELAN, LLP  
FRANK FEDERMAN, ESQ., Id. No. 12248  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

---

ATTORNEY FOR PLAINTIFF

WELLS FARGO HOME MORTGAGE, INC.  
Plaintiff

: COURT OF COMMON PLEAS

: CIVIL DIVISION

Vs.

: CLEARFIELD COUNTY

WILLIAM A. TINKER  
CATHY J. TINKER

: NO. 2003-183

Defendants

TO: WILLIAM A. TINKER, INMATE # 07009068  
LSCI OLD HIGHWAY 75  
BUTNER, NC 27509

DATE OF NOTICE: JULY 3, 2003

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

**IMPORTANT NOTICE**

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

---

FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff



FEDERMAN AND PHELAN, LLP  
FRANK FEDERMAN, ESQ., Id. No. 12248  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
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ATTORNEY FOR PLAINTIFF

WELLS FARGO HOME MORTGAGE, INC.  
Plaintiff

: COURT OF COMMON PLEAS

Vs.

: CIVIL DIVISION

WILLIAM A. TINKER  
CATHY J. TINKER

: CLEARFIELD COUNTY

Defendants

: NO. 2003-183

TO: CATHY J. TINKER  
RR4 BOX 375 A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

DATE OF NOTICE: JULY 3, 2003

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

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---

FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQUIRE  
IDENTIFICATION NO. 12248  
ONE PENN CENTER AT SUBURBAN STATION  
1617 JOHN F. KENNEDY BLVD., SUITE 1400  
PHILADELPHIA, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

WELLS FARGO HOME MORTGAGE, INC. CLEARFIELD COUNTY

vs.

No.: 2003-183

WILLIAM A. TINKER  
CATHY J. TINKER

**VERIFICATION OF NON-MILITARY SERVICE**

FRANK FEDERMAN, ESQUIRE, hereby verifies that he is attorney for the Plaintiff in the above-captioned matter, and that on information and belief, he has knowledge of the following facts, to wit:

(a) that the defendant(s) is/are not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of Congress of 1940, as amended.

(b) that defendant, WILLIAM A. TINKER, is over 18 years of age, and resides at LSCI OLD HIGHWAY 75, INMATE #07009068, BUTNER, NC 27509 .

(c) that defendant, CATHY J. TINKER, is over 18 years of age, and resides at RD#4 BOX 465, APT. C, DUBOIS, PA 15801.

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

  
FRANK FEDERMAN, ESQUIRE

FILED

ICC 9/16/03

to each Def.

SEP 18 2003

Statement to Atty

William A. Shaw

Prothonotary/Clerk of Courts

Atty pd. 20.00

*[Signature]*

**PRAECIPE FOR WRIT OF EXECUTION--(MORTGAGE FORECLOSURE)**  
**Pa.R.C.P. 3180-3183**

**WELLS FARGO HOME MORTGAGE, INC.**

**vs.**

**WILLIAM A. TINKER**  
**CATHY J. TINKER**

**IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA**

**No. 2003-183-CD**

**PRAECIPE FOR WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

To the Director of the Office of the Prothonotary:

Issue writ of execution in the above matter:

Amount Due

\$52,164.83

Interest from 8/25/03 to  
Date of Sale (\$8.58 per diem)

and Costs.

139.00 Prothonotary costs

Frank Federman

Frank Federman, Esquire

Attorney for Plaintiff

One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814

Note: Please attach description of Property.

MLD

**FILED**

**SEP 18 2003**

William A. Shaw  
Prothonotary/Clerk of Courts

No. 2003-183

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

WELLS FARGO HOME MORTGAGE, INC.

vs.

WILLIAM A. TINKER  
CATHY J. TINKER

PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)

FRANK HALLMAN  
Attorney for Plaintiff(s)

Address: LSCI OLD HIGHWAY 75, INMATE #07009068, BUTNER, NC 27509  
RD#4 BOX 465, APT. C, DUBOIS, PA 15801  
Where papers may be served.

William A. Shaw  
Prothonotary/Clerk of Courts

FILED 1 CC to SHAW & LeClerc w/pap.  
m/10:35 AM  
SEP 18 2003  
Attg. pd. 20.00  
desc.

3  
Shaw

CLEARFIELD COUNTY

WELLS FARGO HOME MORTGAGE, INC.

No.: 2003-183

vs.

WILLIAM A. TINKER  
CATHY J. TINKER

**AFFIDAVIT PURSUANT TO RULE 3129**  
**(Affidavit No. 1)**

WELLS FARGO HOME MORTGAGE, INC., Plaintiff in the above action, by its attorney, Frank Federman, Esquire, 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 4 BOX 375, DUBOIS, PA 15801:

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

Name

Last Known Address (if address cannot be  
reasonably ascertained, please indicate)

WILLIAM A. TINKER

LSCI OLD HIGHWAY 75, INMATE #07009068  
BUTNER, NC 27509

CATHY J. TINKER

RD#4 BOX 465, APT. C  
DUBOIS, PA 15801

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

SAME AS ABOVE

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.

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

August 22, 2003

WELLS FARGO HOME MORTGAGE, INC.

No.: 2003-183

vs.

WILLIAM A. TINKER

CATHY J. TINKER

**AFFIDAVIT PURSUANT TO RULE 3129**  
**(Affidavit No. 2)**

WELLS FARGO HOME MORTGAGE, INC., Plaintiff in the above action, by its attorney, Frank Federman, Esquire, 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 4 BOX 375, DUBOIS, PA 15801:

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

Name	Last Known Address (if address cannot be reasonably ascertained, please indicate)
------	---

None.

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

Name	Last Known Address (if address cannot be reasonable ascertained, please indicate)
------	---

None.

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

Name

Last Known Address (if address cannot be  
reasonable ascertained, please indicate)

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

Last Known Address (if address cannot be  
reasonably ascertained, please indicate)

Clearfield County Domestic Relations

Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830

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

Last Known Address (if address cannot be  
reasonably ascertained, please indicate)

Commonwealth of Pennsylvania  
Department of Welfare

PO Box 2675  
Harrisburg, PA 17105

Tenant/Occupant

RD 4 BOX 375  
DUBOIS, PA 15801

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.

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

August 22, 2003



FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQUIRE  
ONE PENN CENTER AT  
SUBURBAN STATION  
1617 JOHN F. KENNEDY BOULEVARD  
SUITE 1400  
PHILADELPHIA, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF  
COURT OF COMMON PLEAS  
CIVIL DIVISION

WELLS FARGO HOME MORTGAGE,  
INC.

No.: 2003-183

vs.

CLEARFIELD COUNTY

WILLIAM A. TINKER  
CATHY J. TINKER

CERTIFICATION

FRANK FEDERMAN, ESQUIRE, hereby states that he is the attorney for the Plaintiff in the above captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

- ☐ an FHA Mortgage
- ☐ non-owner occupied
- ☐ vacant
- ☒ Act 91 procedures have been fulfilled

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

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

WRIT OF EXECUTION -- (MORTGAGE FORECLOSURE)

Pa.R.C.P. 3180 to 3183 and Rule 3257

COPY

WELLS FARGO HOME MORTGAGE, INC.

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA

vs.

NO.: 2003-183

WILLIAM A. TINKER  
CATHY J. TINKER

WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

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

Premises: **RD 4 BOX 375, DUBOIS, PA 15801**

(See legal description attached.)

Amount Due

\$52,164.83

Interest from 8/25/03 to

\$ \_\_\_\_\_

Date of Sale (\$8.58 per diem)

Total

\$ \_\_\_\_\_ Plus costs as endorsed.

*139.00 Prothonotary costs*

Dated September 18, 2003  
(SEAL)

Prothonotary, Common Pleas Court of  
Clearfield County, Pennsylvania

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

Deputy

MLD

No. 2003-183

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

WELLS FARGO HOME MORTGAGE, INC.

vs.

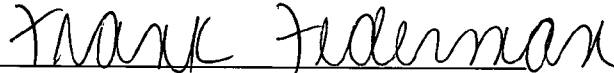
WILLIAM A. TINKER  
CATHY J. TINKER

---

**WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

---

Real Debt	<u>\$52,164.83</u>
Int. from 8/25/03 to Date of Sale (\$8.58 per diem)	_____
Costs	_____
Prothy. Pd.	<u>139.00</u>
Sheriff	_____



Attorney for Plaintiff

Address: LSCI OLD HIGHWAY 75, INMATE #07009068, BUTNER, NC 27509  
RD#4 BOX 465, APT. C, DUBOIS, PA 15801

Where papers may be served.

Frank Federman, Esquire  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

ALL THOSE CERTAIN pieces or parcels of land, lying and being situate in Brady Township, Clearfield County, Pennsylvania, being bounded and described as follows, to wit:

THE FIRST THEREOF:

BEGINNING at an iron pipe corner (Northwestern corner of lot now or formerly of Earl R. Schindley); thence, by lot now or formerly of Schindley, South  $27^{\circ} 32'$  West 155.0 feet to an iron pipe corner; thence by land now or formerly of Joseph Raymond Shafer, North  $56^{\circ} 02'$  East 100.00 feet to an iron pipe corner; thence, still by lands now or formerly of Joseph Raymond Shafer, North  $27^{\circ} 32'$  East 155.0 feet to an iron pipe corner; thence by land now or formerly of Cora Lyons, South  $56^{\circ} 02'$  West 100.0 feet to place of beginning. CONTAINING 15,402 square feet.

THE SECOND THEREOF:

BEGINNING at a set  $3/4"$  iron rebar corner, said corner being the Northwest corner of the property described herein; thence along land of Dorothy E. Shafer, South  $62^{\circ} 36' 46"$  East, a distance of 25.98 feet to a set  $3/4"$  iron rebar corner; thence along land of Pamela J. Shafer, South  $20^{\circ} 13' 50"$  West, a distance of 46.07 feet to a set  $3/4"$  iron rebar corner; thence along land of Pamela J. Shafer, South  $62^{\circ} 35' 08"$  East, a distance of 100.18 feet to a set  $3/4"$  iron rebar corner; thence along land of David J. and Robyn J. Davis and Dorothy E. Shafer, South  $20^{\circ} 07' 14"$  West, a distance of 18.40 feet to a set  $3/4"$  iron rebar corner; thence along land of Dorothy E. Shafer, North  $58^{\circ} 36' 22"$  West, a distance of 127.51 feet to a set  $3/4"$  iron rebar corner; thence along land of Dorothy E. Shafer, North  $20^{\circ} 07' 14"$  East, a distance of 55.55 feet to a set  $3/4"$  iron rebar corner, the place of beginning.

CONTAINING 0.07 acres and shown as Lot 2 on a plan titled, "Final Subdivision Plan and Lot Consolidation Plan of Dorothy E. Shafer, Brady Township, Clearfield County" as prepared by Hess and Fisher Engineers, Inc., dated May 24, 2000.

THE above description was prepared by Hess and Fisher Engineers, Inc., in accordance with a survey performed by them.

A combined description of the above two (2) parcels is more particularly set forth as follows in accordance with a survey performed by Hess and Fisher Engineers, Inc.:

BEGINNING at a set  $3/4"$  iron rebar corner, said corner being the Northwest corner of the property described herein; thence along the Southern line of a private driveway, South  $63^{\circ} 10' 02"$  East, a distance of 100.11 feet to a set  $3/4"$  iron rebar; thence along land now or formerly of David J. and Robyn J. Davis, South  $20^{\circ} 17' 29"$  West, a distance of 162.99 feet to a set  $3/4"$  iron rebar corner; thence along land now or formerly of David J. and Robyn J. Davis and Dorothy E. Shafer, South  $20^{\circ} 07' 14"$  West, a distance of 18.41 feet to a set  $3/4"$  iron rebar; thence along land of Dorothy E. Shafer, North  $58^{\circ} 36' 22"$  West, a distance of 127.51 feet to a set  $3/4"$  iron rebar; thence along land of Dorothy E. Shafer, North  $20^{\circ} 07' 14"$  East, a distance of 55.55 feet to a set  $3/4"$  iron rebar; thence along land of Dorothy E. Shafer, South  $62^{\circ} 35' 08"$  East, a distance of 25.98 feet to a set  $3/4"$  iron rebar; thence along land of Dorothy E. Shafer, North  $20^{\circ} 17' 29"$  East, a distance of 115.91 feet to a set  $3/4"$  iron rebar, the place of beginning.

CONTAINING 0.44 acres as shown on the attached map as prepared by Hess and Fisher Engineers, Inc., dated November 13, 2000, titled, "Plat of Land of Pamela J. Shafer, Brady Township, Clearfield County."

Tax Parcel# 107-CO5-41

TITLE TO SAID PREMISES IS VESTED IN William A. Tinker and Cathy J. Tinker, his wife by Deed from Pamela J. Schafer, et al dated 11/18/2000 and recorded 2/1/2000 in Instrument ID# 200017806.

OFFICE OF THE PROTHONOTARY  
CLEARFIELD COUNTY COURTHOUSE  
230 EAST MARKET STREET  
CLEARFIELD, PA 16830

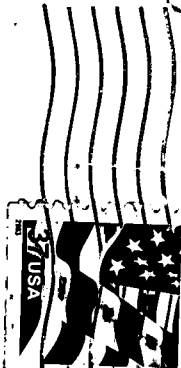
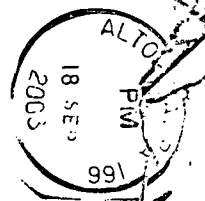
FILED

OCT 23 2003

William A. Shaw  
Prothonotary/Clerk of Courts

*Re-mailed to  
address below*

WILLIAM A. TINKER  
~~RD 4 BOX 375~~  
~~DUBOIS, PA 15801~~



*new address:*

*Bill Tinker*

*07009-068*

*Unit B*

*76*

*RS CI*

*P.O. 999*

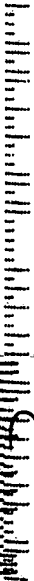
*Butner, N.C.*

*27509-0999*

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



16830-2448, 04



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

WELLS FARGO HOME MORTGAGE, INC.  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

No.: 2003-183 -CD

vs.

WILLIAM A. TINKER  
CATHY J. TINKER  
RD 4 BOX 375  
DUBOIS, PA 15801

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

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against WILLIAM A. TINKER and CATHY J. TINKER, 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	\$49,932.82
Interest (2/10/03 to 8/25/03)	<u>2,232.01</u>
<b>TOTAL</b>	<b>\$52,164.83</b>

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

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

Damages are hereby assessed as indicated.

DATE: September 18, 2003

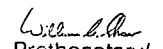
  
PRO PROTHY

MLD

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

SEP 18 2003

Attest.

  
Prothonotary/  
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

WELLS FARGO HOME MORTGAGE, INC.

Plaintiff

vs.

No.: 2003-183

WILLIAM A. TINKER  
CATHY J. TINKER

Defendant(s)

Notice is given that a Judgment in the above captioned matter has been entered  
against you on September 18, 2003.

By: Willi [Signature] ~~DEPUTY~~

If you have any questions concerning this matter please contact:

Frank Federman  
FRANK FEDERMAN, ESQUIRE  
Attorney or Party Filing  
One Penn Center at Suburban Station  
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Philadelphia, PA 19103-1814  
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FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

---

ATTORNEY FOR PLAINTIFF

WELLS FARGO HOME MORTGAGE, INC.  
Plaintiff

: COURT OF COMMON PLEAS

: CIVIL DIVISION

Vs.

: CLEARFIELD COUNTY

WILLIAM A. TINKER  
CATHY J. TINKER

: NO. 2003-183

Defendants

TO: WILLIAM A. TINKER, INMATE # 07009068  
LSCI OLD HIGHWAY 75  
BUTNER, NC 27509

DATE OF NOTICE: JULY 3, 2003

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

---

FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff



FEDERMAN AND PHELAN, LLP  
FRANK FEDERMAN, ESQ., Id. No. 12248  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

---

ATTORNEY FOR PLAINTIFF

WELLS FARGO HOME MORTGAGE, INC.  
Plaintiff

: COURT OF COMMON PLEAS

Vs.

: CIVIL DIVISION

: CLEARFIELD COUNTY

WILLIAM A. TINKER  
CATHY J. TINKER

: NO. 2003-183

Defendants

TO: CATHY J. TINKER  
RR4 BOX 375 A/K/A RD 4 BOX 375  
DUBOIS, PA 15801

DATE OF NOTICE: JULY 3, 2003

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

**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:

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

---

FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

FEDERMAN AND PHELAN, LLP

By: FRANK FEDERMAN, ESQUIRE

IDENTIFICATION NO. 12248

ONE PENN CENTER AT SUBURBAN STATION

1617 JOHN F. KENNEDY BLVD., SUITE 1400

PHILADELPHIA, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS

CIVIL DIVISION

WELLS FARGO HOME MORTGAGE, INC. CLEARFIELD COUNTY

vs.

No.: 2003-183

WILLIAM A. TINKER

CATHY J. TINKER

**VERIFICATION OF NON-MILITARY SERVICE**

FRANK FEDERMAN, ESQUIRE, hereby verifies that he is attorney for the Plaintiff in the above-captioned matter, and that on information and belief, he has knowledge of the following facts, to wit:

(a) that the defendant(s) is/are not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of Congress of 1940, as amended.

(b) that defendant, WILLIAM A. TINKER, is over 18 years of age, and resides at LSCI OLD HIGHWAY 75, INMATE #07009068, BUTNER, NC 27509.

(c) that defendant, CATHY J. TINKER, is over 18 years of age, and resides at RD#4 BOX 465, APT. C, DUBOIS, PA 15801.

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

  
FRANK FEDERMAN, ESQUIRE

AFFIDAVIT OF SERVICE

PLAINTIFF

CLEARFIELD COUNTY

WELLS FARGO HOME MORTGAGE, INC.

ACCT. #8291260

DEFENDANT

COURT NO.: 2003-183

WILLIAM A. TINKER

CATHY J. TINKER

**FILED**  
m 11:30 AM  
NOV 19 2003  
William A. Shaw  
Prothonotary/Clerk of Courts  
No CC

SERVE WILLIAM A. TINKER AT:

TYPE OF ACTION

LSCI OLD HIGHWAY 75, INMATE #07009068  
BUTNER, NC 27509

XX Notice of Sheriff's Sale

SALE DATE: DECEMBER 5, 2003

SERVED

Served and made known to William A. Tinker, Defendant on the 30 day of October, 2003, at 130 o'clock P. M., at FBI in Butner NC, Commonwealth of Pennsylvania, in the manner described below:

☒ Defendant personally served.

☐ Adult family member with whom Defendant(s) reside(s).

Relationship is \_\_\_\_\_.

☐ Adult in charge of Defendant's residence who refused to give name or relationship.

☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).

☐ Agent or person in charge of Defendant's office or usual place of business.

☐ \_\_\_\_\_ an officer of said Defendant's company.

☐ Other: \_\_\_\_\_.

Description: Age 48 Height 6'2" Weight 205 Race W Sex M Other \_\_\_\_\_

I, Rep. Edward Newman a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed  
before me this 30<sup>th</sup> day  
of October, 2003.

my commission expires - 3/18/08

Notary: Cora L. Chavis

By: Shanville County, N.C.

NOT SERVED

On the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_ M., Defendant NOT FOUND because:

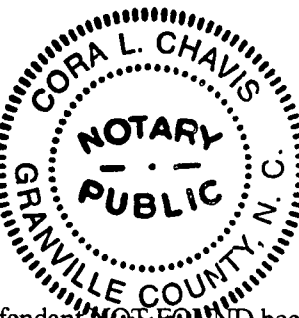
☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant

Other:

Sworn to and subscribed  
before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 200\_\_\_\_.

By:

Notary:



ATTORNEY FOR PLAINTIFF  
FRANK FEDERMAN, ESQUIRE  
I.D.#12248  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Pa. 5.00  
Rec'd 10/24/03

SALE DATE: \_\_\_\_\_

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION – LAW

WELLS FARGO HOME MORTGAGE, INC.

No.: 2003-183

vs.

WILLIAM A. TINKER  
CATHY J. TINKER

**FILED** NO  
mll 11/24/03  
NOV 24 2003  
C  
K2.1

William A. Shaw  
Prothonotary/Clerk of Courts

**AFFIDAVIT PURSUANT TO RULE 3129.1  
AND RETURN OF SERVICE PURSUANT TO  
Pa. R.C.P. 405 OF NOTICE OF SALE**

Plaintiff in the above action 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 4 BOX 375, DUBOIS, PA 15801.

As required by Pa. R.C.P. 3129.2(a) Notice of Sale has been given in the manner required by Pa. R.C.P. 3129.2(c) on each of the persons or parties named, at that address set forth on the attached Affidavit No. 2 (previously filed) and Supplemental Affidavit No. 2 on the date indicated, and a copy of the notice is attached as an Exhibit. A copy of the Certificate of Mailing (Form 3817) and/or Certified Mail Return Receipt stamped by the U.S. Postal Service is attached for each notice.

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.

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

CLEARFIELD COUNTY

WELLS FARGO HOME MORTGAGE, INC.

No.: 2003-183

vs.

WILLIAM A. TINKER  
CATHY J. TINKER

**AFFIDAVIT PURSUANT TO RULE 3129  
(Affidavit No. 2)**

WELLS FARGO HOME MORTGAGE, INC., Plaintiff in the above action, by its attorney, Frank Federman, Esquire, 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 4 BOX 375, DUBOIS, PA 15801:

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

Name	Last Known Address (if address cannot be reasonably ascertained, please indicate)
------	---

None.

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

Name	Last Known Address (if address cannot be reasonable ascertained, please indicate)
------	---

None.

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

Name

Last Known Address (if address cannot be  
reasonable ascertained, please indicate)

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

Last Known Address (if address cannot be  
reasonably ascertained, please indicate)

Clearfield County Domestic Relations

Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830

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

Last Known Address (if address cannot be  
reasonably ascertained, please indicate)

Commonwealth of Pennsylvania  
Department of Welfare

PO Box 2675  
Harrisburg, PA 17105

Tenant/Occupant

RD 4 BOX 375  
DUBOIS, PA 15801

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.

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

August 22, 2003

Name and Address Of Sender  
FEDERMAN AND PHELAN, LLP  
One Penn Center at Suburban Station Suite 1400  
Philadelphia, PA 19103-1814 Dan G. Trautz/MLD

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postmaster, Per (Name Of Receiving Employee)	Total Number of Pieces Received at Post Office	Postage	Fee
1	WILLIAM A. TINKER	Tenant/Occupant, RD 4 BOX 375, DUBOIS, PA 15801				
2	8291260	Clearfield County Domestic Relations Clearfield County Courthouse 230 East Market Street Clearfield, PA 16830				
3		Commonwealth of Pennsylvania Department of Welfare PO Box 2675 Harrisburg, PA 17105				
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
Total Number of Pieces Listed By Sender						

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 \$50,000.00 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional insurance. See Domestic Mail Manual R900.S913 and S921 for limitations of coverage.

October 13, 2003

**WELLS FARGO HOME MORTGAGE, INC.**

**vs.**

**WILLIAM A. TINKER**

**CATHY J. TINKER**

**TO: All parties in Interest and Claimants**

**NOTICE OF SHERIFF'S SALE**  
**OF REAL PROPERTY**

**OWNER(S): WILLIAM A. TINKER and CATHY J. TINKER**

**PROPERTY: RD 4 BOX 375, DUBOIS, PA 15801**

Improvements: Residential dwelling

Judgment Amount: **\$52,164.83**

**CLEARFIELD COUNTY**  
**No. 2003-183**

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on DECEMBER 5, 2003, at the Clearfield County Courthouse, 1 North 2<sup>nd</sup> Street, Suite 116, Clearfield, PA 16830 at 10:00 A.M..

Our records indicate that you may hold a mortgage, judgment, or other interest on the property, which may be extinguished by the sale. You may wish to attend the sale to protect your interests. If you have any questions regarding the type of lien or the effect of the Sheriff's Sale upon your lien, we urge you to **CONTACT YOUR OWN ATTORNEY**, as we are not permitted to give you legal advice.

The Sheriff will file a schedule of Distribution 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.



FEDERMAN AND PHELAN

By: FRANK FEDERMAN, ESQUIRE

IDENTIFICATION NO. 12248

ONE PENN CENTER AT SUBURBAN STATION,  
SUITE 1400

PHILADELPHIA, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS

CIVIL DIVISION

WELLS FARGO HOME MORTGAGE, INC.

CLEARFIELD COUNTY

vs.

No.: 2003-183

WILLIAM A. TINKER

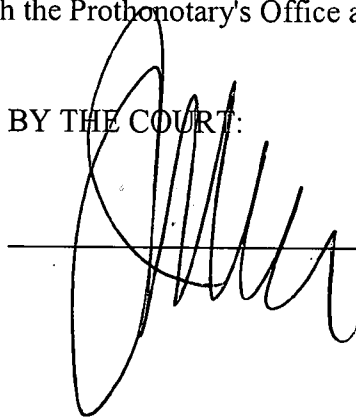
CATHY J. TINKER

**ORDER**

AND NOW, this 25<sup>th</sup> day of November, 2003, upon consideration of Plaintiff's Motion and the Affidavit of Good Faith Investigation attached thereto, it is hereby **ORDERED** that Plaintiff may obtain service of the Notice of Sale on the above captioned Defendant(s), **CATHY J. TINKER**, by mailing a true and correct copy of the Notice of Sale by certified mail and regular mail to Defendant's last known address and the mortgaged premises.

Service of the aforementioned mailings is effective upon the date of mailing and is to be done by Plaintiff's attorney, who will file with the Prothonotary's Office an Affidavit of service.

BY THE COURT:



J.

**FILED**

NOV 25 2003

William A. Shaw  
Prothonotary

FILED

D 3:05 PM 100 to City Fed Bureau

NOV 25 2003

ES  
KPS

William A. Shaw  
Prothonotary

AFFIDAVIT OF SERVICE

PLAINTIFF  
WELLS FARGO HOME MORTGAGE, INC.

CLEARFIELD COUNTY

ACCT. #8291260

DEFENDANT  
WILLIAM A. TINKER  
CATHY J. TINKER

COURT NO.: 2003-183

SERVE CATHY J. TINKER AT:  
RD#4 BOX 375  
DUBOIS, PA 15801

TYPE OF ACTION  
XX Notice of Sheriff's Sale  
SALE DATE: DECEMBER 5, 2003

EXHIBIT 'A'

SERVED

Served and made known to \_\_\_\_\_, Defendant on the \_\_\_\_ day of \_\_\_\_\_, 200 \_\_, at \_\_\_\_\_, o'clock \_\_. M., at \_\_\_\_\_, Commonwealth of Pennsylvania, in the manner described below:

- ☐ Defendant personally served.  
☐ Adult family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.  
☐ Adult in charge of Defendant's residence who refused to give name or relationship.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business.  
☐ \_\_\_\_\_ an officer of said Defendant's company.  
☐ Other: \_\_\_\_\_

Description: Age \_\_\_\_\_ Height \_\_\_\_\_ Weight \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_ Other \_\_\_\_\_

I, \_\_\_\_\_, a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed  
before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 200 \_\_\_\_.

Notary:

By:

FILED

NOV 21 2003

William A. Shaw  
Prothonotary/Clerk of Courts

NOT SERVED

On the 12 day of Nov, 2003, at 2:26 o'clock P. M., Defendant NOT FOUND because:

☒ Moved ☐ Unknown ☐ No Answer ☒ Vacant

Other:

Sworn to and subscribed  
before me this 13th day  
of November, 2003.

By:

Notary:

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

Member, Pennsylvania Association of Notaries

ATTORNEY FOR PLAINTIFF  
FRANK FEDERMAN, ESQUIRE  
I.D.#12248  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

AFFIDAVIT OF SERVICE

PLAINTIFF  
WELLS FARGO HOME MORTGAGE, INC.

CLEARFIELD COUNTY

ACCT. #8291260

DEFENDANT  
WILLIAM A. TINKER  
CATHY J. TINKER

COURT NO.: 2003-183

SERVE CATHY J. TINKER AT:  
RD#4 BOX 465, APT. C  
DUBOIS, PA 15801

TYPE OF ACTION  
XX Notice of Sheriff's Sale  
SALE DATE: DECEMBER 5, 2003

EXHIBIT "A"

SERVED

Served and made known to \_\_\_\_\_, Defendant on the \_\_\_\_ day of \_\_\_\_\_, 200 \_\_, at \_\_\_\_\_, o'clock \_\_ M., at \_\_\_\_\_, Commonwealth of Pennsylvania, in the manner described below:

- ☐ Defendant personally served.  
☐ Adult family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.  
☐ Adult in charge of Defendant's residence who refused to give name or relationship.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business.  
☐ \_\_\_\_\_ an officer of said Defendant's company.  
☐ Other: \_\_\_\_\_

Description: Age \_\_\_\_\_ Height \_\_\_\_\_ Weight \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_ Other \_\_\_\_\_

I, \_\_\_\_\_, a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed  
before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 200\_\_.

Notary:

By:

NOT SERVED

On the 27 day of Oct, 2003, at 2:49 o'clock P. M., Defendant NOT FOUND because:

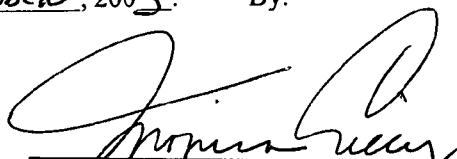
☒ Moved ☐ Unknown ☐ No Answer ☐ Vacant

Other:

Sworn to and subscribed  
before me this 28th day  
of October, 2003.

By:

Notary:

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

Member, Pennsylvania Association of Notaries

ATTORNEY FOR PLAINTIFF  
FRANK FEDERMAN, ESQUIRE  
I.D.#12248  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Clear

**DEFAULT EXPRESS SERVICES, INC.**  
**AFFIDAVIT OF GOOD FAITH INVESTIGATION**

File Number: 03-7262

Attorney Firm: **Federman & Phelan**

Subject: **William A. Tinker & Cathy J. Tinker**

**EXHIBIT "B"**

Current Address: RD 4 Box 375 Dubois, PA 15801

Property Address: RD 4 Box 375 Dubois, PA 15801

Mailing Address: RD 4 Box 375 Dubois, PA 15801

**I Steven M. Ruffo, being duly sworn according to law, do hereby depose and state as follows, I have conducted an investigation into the whereabouts of the above-noted individual(s) on 2/21/03 and have discovered the following:**

**I. CREDIT INFORMATION**

**A. SOCIAL SECURITY NUMBER**

**Our search verified the following to be true and correct**

**William A. Tinker - 194-46-2563    Cathy J. Tinker - 177-50-5683**

**B. EMPLOYMENT SEARCH**

**William A. Tinker - Our office was unable to verify the employment information supplied on the credit report.**

**Cathy J. Tinker - Our office was unable to verify the employment information supplied on the credit report.**

**C. INQUIRY OF CREDITORS**

**On 2/21/03 our inquiry with the creditors indicate that William A. Tinker & Cathy J. Tinker reside(s) at: RD 4 Box 375 Dubois, PA 15801**

**II. INQUIRY OF TELEPHONE COMPANY**

**A. DIRECTORY ASSISTANCE SEARCH**

**On 2/21/03 our office contacted directory assistance which indicated that William A. Tinker & Cathy J. Tinker reside(s) at: RD 4 Box 375 Dubois, PA 15801 - non published. Our office could not reach the mortgagor due to the non published number.**

**III. INQUIRY OF NEIGHBORS**

**Using our whitepages database we were unable to verify the current address with a neighbor.**

**IV. INQUIRY OF POST OFFICE**

**A. NATIONAL ADDRESS UPDATE**

**Our inquiry with the national address database on 2/21/03 indicates the following is correct: William A. Tinker & Cathy J. Tinker - RD 4 Box 375 Dubois, PA 15801**

**B. ACTIVE ADDITIONAL MAILING ADDRESSES**

**Per our inquiry with the creditors on 2/21/03 the following is an active mailing address: PO Box 854 Dubois, PA 15801**

**V. MOTOR VEHICLE REGISTRATION**

**A. MOTOR VEHICLE & DMV OFFICE**

**Per the Pennsylvania Department of Motor Vehicle William A. Tinker & Cathy J. Tinker has a valid identification registered with the state.**

**VI. OTHER INQUIRIES**

**A. DEATH RECORDS**

**As of Jan. 1, 2003 Vital Records has no death record on file for William A. Tinker & Cathy J. Tinker.**

B. PUBLIC LICENSES (PILOT, REAL ESTATE, ETC.)

Our office conducted a check on 2/21/03 for public licenses and found the following: no record on file.

C. COUNTY VOTER REGISTRATION

The Clearfield Cnty Voter reg has a registration for William A. Tinker & Cathy J. Tinker

D. INTERNET

All accessible public databases have been checked and cross-referenced for the above named individual(s).

E. TAX ASSESSMENT OFFICE

On 2/21/03 our office conducted a search of the following tax records which showed the following: not applicable

VII. ADDITIONAL INFORMATION OF SUBJECT

A. DATE OF BIRTH

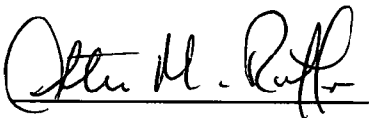
William A. Tinker - 6/17/57    Cathy J. Tinker - 5/30/57

B. A.K.A.

Cathy J. Krach

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

I hereby verify that the statements made herein are true and correct to the best of my knowledge, information and belief and that this affidavit of investigation is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.



AFFIANT Steven M. Ruffo  
Default Express Services, Inc. President

Sworn to and subscribed before me this \_\_21\_\_ day of \_Feb\_\_ 2003

NOTARIAL SEAL  
Jocelyn Ruffo  
Notary Public State of New Jersey  
My Commission Expires Mar. 21, 2007

  
NOTARY PUBLIC

DEFAULT EXPRESS SERVICES, INC  
43 WILSON DRIVE  
SICKLERVILLE, NJ 08081  
PHONE: (856) 740-5027  
DEFAULTEXPRESS@COMCAST.NET

ABOVE INFORMATION IS OBTAINED FROM AVAILABLE PUBLIC RECORDS  
AND WE ARE ONLY LIABLE FOR THE COST OF THE AFFIDAVIT

EXHIBIT "B"

**FEDERMAN AND PHELAN, L.L.P.  
ONE PENN CENTER AT SUBURBAN STATION  
1617 JOHN F. KENNEDY BOULEVARD, SUITE 1400  
PHILADELPHIA, PA 19103-1814  
(215) 563-7000**

**EXHIBIT "B"**

POSTMASTER  
DUBOIS, PA 15801

**Request for Change of Address of Box holder  
Information Needed for Service of Legal Process**

Please furnish the new address or the name and street address for the following:

NAME: TINKER, WILLIAM A. & CATHY J.  
ADDRESS: RD 4 BOX 375, DUBOIS, PA, 15801  
ACCOUNT NUMBER: 8291260

NOTE: The name and last known address are required for change of address information. The name, if known, and post office box address are required for box holder information.

The following information is provided in accordance with 39 CFR 265.5(d)(6)(ii). There is no fee for providing box holder information. The fee for providing change of address information is waived in accordance with 39 CRF 265.5(d)(1) and (2) and corresponding Administrative Support Manual 352.44a and b.

1. Capacity of Requester: ATTORNEY
2. Statute or regulation that empowers me to serve: N/A
3. The names of all parties to the litigation: ; TINKER, WILLIAM A. & CATHY J.
4. The court in which the case has been or will be heard: CCP, CLEARFIELD COUNTY
5. The docket or other identifying number: NOT YET AVAILABLE
6. The capacity in which this individual is to be served: PARTY TO CIVIL ACTION

**WARNING**

THE SUBMISSION OF FALSE INFORMATION TO OBTAIN AND USE CHANGE OF ADDRESS INFORMATION FOR BOXHOLDER INFORMATION FOR ANY PURPOSE OTHER THAN THE SERVICE OF LEGAL PROCESS IN CONNECTION WITH ACTUAL OR PROSPECTIVE LITIGATION COULD RESULT IN CRIMINAL PENALTIES INCLUDING A FINE OF UP TO \$10,000 OR IMPRISONMENT OR (2) TO AVOID PAYMENT OF THE FEE FOR CHANGE OF ADDRESS INFORMATION OF NOT MORE THAN 5 YEARS, OR BOTH (TITLE 18 USC SECTION 1001)

I certify that the above information is true and that the address information is needed and will be used solely for service of legal process in connection with actual or prospective litigation.

*Lawrence T. Phelan*

Lawrence T. Phelan, I.D #32227  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard, Ste 1400  
Philadelphia, PA 19103-1814

**FOR POST OFFICE USE ONLY**

**NEW ADDRESS (name & street address):**

*Cathy TINKER*  
*RD 4 465C*  
*Dubois PA 15801*



- William Tinker* ☒ ☐ ☐ ☐
- ☒ No change of address order on file
  - ☐ Moved, left no forwarding address
  - ☐ Not known at address given
  - ☐ No such address
  - ☐ Good as addressed

FEDERMAN AND PHELAN

By: FRANK FEDERMAN, ESQUIRE

IDENTIFICATION NO. 12248

ONE PENN CENTER AT SUBURBAN STATION,  
SUITE 1400

PHILADELPHIA, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

WELLS FARGO HOME MORTGAGE, INC. CLEARFIELD COUNTY

vs.

No.: 2003-183

WILLIAM A. TINKER

CATHY J. TINKER

**MOTION FOR SERVICE PURSUANT TO  
SPECIAL ORDER OF COURT**

Plaintiff, by its counsel, Frank Federman, Esquire, moves this Honorable Court for an Order directing service of the Notice of Sale upon the above captioned Defendant(s) by certified mail and regular mail to Defendant's last known address.

1. Attempts to serve Defendant with Notice of Sale have been unsuccessful, as indicated by the Affidavit of Service attached hereto as Exhibit "A."

2. Pursuant to Pennsylvania Rule of Civil Procedure 430, Plaintiff has made a good faith effort to locate the Defendant. An Affidavit of Good Faith Investigation setting forth the specific inquiries made and the results therefrom is attached hereto as Exhibit "B."

**WHEREFORE**, Plaintiff respectfully requests this Honorable Court enter an Order pursuant to Pennsylvania Rule of Civil Procedure 430 directing service of the Notice of Sale by certified mail and regular mail to Defendant's last known address and the mortgaged premises.



FRANK FEDERMAN, ESQUIRE  
ATTORNEY FOR PLAINTIFF



FEDERMAN AND PHELAN

By: FRANK FEDERMAN, ESQUIRE

IDENTIFICATION NO. 12248

ONE PENN CENTER AT SUBURBAN STATION,  
SUITE 1400

PHILADELPHIA, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS

CIVIL DIVISION

CLEARFIELD COUNTY

WELLS FARGO HOME MORTGAGE, INC.

No.: 2003-183

vs.

WILLIAM A. TINKER

CATHY J. TINKER

**MEMORANDUM OF LAW**

Pennsylvania Rule of Civil Procedure 430(a) specifically provides:

(a) If service cannot be made under the applicable rule, the plaintiff may move the Court for a special order directing the method of service. The Motion shall be accompanied by an Affidavit stating the nature and extent of the investigation which has been made to determine the whereabouts of the Defendant and the reasons why service cannot be made.


Note: A Sheriff's return of "Not Found" or the fact that a Defendant has moved without leaving a new forwarding address is insufficient evidence of concealment. Gonzales vs. Polis, 238 Pa. Super. 362, 357 A.2d 580 (1976). "Notice of intended adoption mailed to last known address requires a good faith effort to discover the correct address." Adoption of Walker, 468 Pa. 165, 360 A.2d 603 (1976).

An illustration of good faith effort to locate the defendant includes (1) inquiries of postal authorities including inquiries pursuant to the Freedom of Information Act, 39 C.F.R. Part 265, (2) inquiries of relatives neighbors, friends and employers of the Defendant and (3) examinations of local telephone directories, voter registration records, local tax records, and motor vehicle records.

As indicated by the attached Affidavit of Service, marked hereto as Exhibit "A", the Sheriff has been unable to serve the Notice of Sale. A good faith effort to discover the whereabouts of the Defendant has been made as evidenced by the attached Affidavit of Good Faith Investigation, marked Exhibit "B."

**WHEREFORE**, Plaintiff respectfully requests service of the Notice of Sale by certified mail and regular mail to Defendant's last known address.

Respectfully submitted:



FRANK FEDERMAN, ESQUIRE  
ATTORNEY FOR PLAINTIFF

## VERIFICATION

**FRANK FEDERMAN, ESQUIRE**, hereby states that he is the Attorney for the Plaintiff in this action, that he is authorized to take this Affidavit, and that the statements made in the foregoing **MOTION FOR SERVICE OF THE NOTICE OF SALE PURSUANT TO SPECIAL ORDER OF COURT** are true and correct to the best of his knowledge, information and belief.

The undersigned understands that this statement herein 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

FEDERMAN AND PHELAN

By: FRANK FEDERMAN, ESQUIRE

IDENTIFICATION NO. 12248

ATTORNEY FOR PLAINTIFF

ONE PENN CENTER AT SUBURBAN STATION,  
SUITE 1400

PHILADELPHIA, PA 19103-1814

(215) 563-7000

COURT OF COMMON PLEAS

CIVIL DIVISION

WELLS FARGO HOME MORTGAGE, INC. CLEARFIELD COUNTY

vs.

No.: 2003-183

WILLIAM A. TINKER

CATHY J. TINKER

**CERTIFICATION OF SERVICE**

I, FRANK FEDERMAN, ESQUIRE, hereby certify that a copy of the Motion for Service Pursuant to Special Order of Court has been sent to the individuals indicated below on November 18, 2003.

WILLIAM A. TINKER

CATHY J. TINKER

LSCI OLD HIGHWAY 75, INMATE #07009068

BUTNER, NC 27509

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

Date: November 18, 2003

FILED No. 100  
NOV 11 3 38 PM '03  
NOV 21 2003

William A. Shaw  
Prothonotary/Clerk of Courts

FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQUIRE  
IDENTIFICATION NO. 12248  
ONE PENN CENTER AT SUBURBAN STATION,  
SUITE 1400  
PHILADELPHIA, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

WELLS FARGO HOME MORTGAGE, INC. CLEARFIELD COUNTY

vs.

No.: 2003-183

WILLIAM A. TINKER  
CATHY J. TINKER

AFFIDAVIT

I hereby certify that a true and correct copy of the Notice of Sheriff Sale in the above captioned matter was sent by regular mail and certified mail, return receipt requested, to **CATHY J. TINKER** on 12/1/03, at **RD#4 BOX 465, APT. C, DUBOIS, PA 15801 & RD#4 BOX 375, DUBOIS, PA 15801**, in accordance with the Order of Court dated 11/25/03.

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

  
FRANK FEDERMAN, ESQUIRE

Date: December 2, 2003

FILED

DEC 03 2003

William A. Shaw  
Prothonotary/Clerk of Courts

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

Sheriff Docket # 14640

WELLS FARGO HOME MORTGAGE INC.

03-183-CD

VS.

TINKER, WILLIAM A.

WRIT OF EXECUTION      REAL ESTATE

**SHERIFF RETURNS**

---

NOW, OCTOBER 10, 2003 @ 11:05 A.M. O'CLOCK A LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDANTS. THE PROPERTY WAS ALSO POSTED THIS DATE AND TIME.

A SALE DATE OF DECEMBER 5, 2003 WAS SET.

NOW, OCTOBER 10, 2003 @ 11:15 A.M. SERVED CATHY J. TINKER, DEFENDANT, AT HER RESIDENCE RD 4, BOX 465, APT C, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CATHY J. TINKER, DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY THE THE LEVY AND BY MAKING KNOWN TO HER THE CONTENTS THEREOF.

NOW, NOVEMBER 11, 2003 MAILED TO WILLIAM A. TINKER BY REGULAR AND CERTIFIED MAIL NOTICE OF SALE, WRIT OF EXECUTION, AND COPY OF THE LEVY

NOW, NOVEMBER 19, 2003 SERVED WILLIAM A. TINKER, DEFENDANT, BY CERTIFIED MAIL TO LSCI OLD HIGHWAY 75, INMATE #07009068, BUTNER, NC 27509 CERTIFIED #70022410000372241746, WITH A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY.

NOW, DECEMBER 3, 2003 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO RESCHEDULE THE SALE SCHEDULED FOR DECEMBER 5, 2003 TO JANUARY 9, 2004.

NOW, JANUARY 9, 2004 A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANTS THE PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR \$1.00 + COSTS.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 14640

WELLS FARGO HOME MORTGAGE INC.

03-183-CD

VS.

TINKER, WILLIAM A.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

NOW, MARCH 3, 2004 PAID THE COSTS FROM THE ADVANCE AND MADE A REFUND  
OF THE UNUSED ADVANCE TO THE ATTORNEY.

NOW, MARCH 4, 2004 RETURN THE WRIT AS A SALE BEING HELD ON THE PROERTY  
OF THE DEFENDANTS, THE PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR  
\$1.00 + COSTS.

NOW, MARCH 4, 2004 A DEED WAS FILED.

SHEIFF HAWKINS 238.05

SURCHARGE \$40.00

PAID BY ATTORNEY

FILED

MAR 04 2004

William A. Shaw  
Prothonotary

Sworn to Before Me This

4 Day Of March 2004  
William A. Shaw

So Answers,

Chester A. Hawkins  
Chester A. Hawkins  
Sheriff

WRIT OF EXECUTION -- (MORTGAGE FORECLOSURE)  
Pa.R.C.P. 3180 to 3183 and Rule 3257

WELLS FARGO HOME MORTGAGE, INC.

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA

vs.

NO.: 2003-183-CD

WILLIAM A. TINKER  
CATHY J. TINKER

WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

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

Premises: RD 4 BOX 375, DUBOIS, PA 15801

(See legal description attached.)

Amount Due

\$52,164.83

Interest from 8/25/03 to  
Date of Sale (\$8.58 per diem)

\$ \_\_\_\_\_

Total

\$ \_\_\_\_\_ Plus costs as endorsed.  
139.00 Prothonotary costs

Will. A. Tinker  
Prothonotary, Common Pleas Court of  
Clearfield County, Pennsylvania

Dated September 18, 2003  
(SEAL)

By:

Received September 18, 2003 @ 2:00 P.M.  
Chester A. Haverstick  
By Cynthia Butler-Aughenbaugh

Deputy

MLD



No. 2003-183

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

WELLS FARGO HOME MORTGAGE, INC.

VS.

WILLIAM A. TINKER  
CATHY J. TINKER

---

**WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

---

Real Debt \$52,164.83

Int. from 8/25/03  
to Date of Sale (\$8.58 per diem) \_\_\_\_\_

Costs \_\_\_\_\_

Prothy. Pd. 139.00

Sheriff \_\_\_\_\_

  
\_\_\_\_\_  
Attorney for Plaintiff

Address: LSCI OLD HIGHWAY 75, INMATE #07009068, BUTNER, NC 27509  
RD#4 BOX 465, APT. C, DUBOIS, PA 15801  
Where papers may be served.

Frank Federman, Esquire  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

ALL THOSE CERTAIN pieces or parcels of land, lying and being situate in Brady Township, Clearfield County, Pennsylvania, being bounded and described as follows, to wit:

THE FIRST THEREOF:

BEGINNING at an iron pipe corner (Northwestern corner of lot now or formerly of Earl R. Schindley); thence, by lot now or formerly of Schindley, South 27° 32' West 155.0 feet to an iron pipe corner; thence by land now or formerly of Joseph Raymond Shafer, North 56° 02' East 100.00 feet to an iron pipe corner; thence, still by lands now or formerly of Joseph Raymond Shafer, North 27° 32' East 155.0 feet to an iron pipe corner; thence by land now or formerly of Cora Lyons, South 56° 02' West 100.0 feet to place of beginning. CONTAINING 15,402 square feet.

THE SECOND THEREOF:

BEGINNING at a set 3/4" iron rebar corner, said corner being the Northwest corner of the property described herein; thence along land of Dorothy E. Shafer, South 62° 36' 46" East, a distance of 25.98 feet to a set 3/4" iron rebar corner; thence along land of Pamela J. Shafer, South 20° 13' 50" West, a distance of 46.07 feet to a set 3/4" iron rebar corner; thence along land of Pamela J. Shafer, South 62° 35' 08" East, a distance of 100.18 feet to a set 3/4" iron rebar corner; thence along land of David J. and Robyn J. Davis and Dorothy E. Shafer, South 20° 07' 14" West, a distance of 18.40 feet to a set 3/4" iron rebar corner; thence along land of Dorothy E. Shafer, North 58° 36' 22" West, a distance of 127.51 feet to a set 3/4" iron rebar corner; thence along land of Dorothy E. Shafer, North 20° 07' 14" East, a distance of 55.55 feet to a set 3/4" iron rebar corner, the place of beginning.

CONTAINING 0.07 acres and shown as Lot 2 on a plan titled, "Final Subdivision Plan and Lot Consolidation Plan of Dorothy E. Shafer, Brady Township, Clearfield County" as prepared by Hess and Fisher Engineers, Inc., dated May 24, 2000.

THE above description was prepared by Hess and Fisher Engineers, Inc., in accordance with a survey performed by them.

A combined description of the above two (2) parcels is more particularly set forth as follows in accordance with a survey performed by Hess and Fisher Engineers, Inc.:

BEGINNING at a set 3/4" iron rebar corner, said corner being the Northwest corner of the property described herein; thence along the Southern line of a private driveway, South 63° 10' 02" East, a distance of 100.11 feet to a set 3/4" iron rebar; thence along land now or formerly of David J. and Robyn J. Davis, South 20° 17' 29" West, a distance of 162.99 feet to a set 3/4" iron rebar corner; thence along land now or formerly of David J. and Robyn J. Davis and Dorothy E. Shafer, South 20° 07' 14" West, a distance of 18.41 feet to a set 3/4" iron rebar; thence along land of Dorothy E. Shafer, North 58° 36' 22" West, a distance of 127.51 feet to a set 3/4" iron rebar; thence along land of Dorothy E. Shafer, North 20° 07' 14" East, a distance of 55.55 feet to a set 3/4" iron rebar; thence along land of Dorothy E. Shafer, South 62° 35' 08" East, a distance of 25.98 feet to a set 3/4" iron rebar; thence along land of Dorothy E. Shafer, North 20° 17' 29" East, a distance of 115.91 feet to a set 3/4" iron rebar, the place of beginning.

CONTAINING 0.44 acres as shown on the attached map as prepared by Hess and Fisher Engineers, Inc., dated November 13, 2000, titled, "Plat of Land of Pamela J. Shafer, Brady Township, Clearfield County."

Tax Parcel# 107-CO5-41

TITLE TO SAID PREMISES IS VESTED IN William A. Tinker and Cathy J. Tinker, his wife by Deed from Pamela J. Schafer, et al dated 11/18/2000 and recorded 2/1/2000 in Instrument ID# 200017806.

# REAL ESTATE SALE SCHEDULE OF DISTRIBUTION

NAME TINKER NO. 03-183-CD

NOW, January 9, 2004, 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 9TH day of JANUARY 2004 I exposed the within described real estate of WILLIAM A. TINKER AND CATHY J. TINKER to public venue or outcry at which time and place I sold the same to WELLS FARGO HOME MORTGAGE, 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	13.68
LEVY	15.00
MILEAGE	13.68
POSTING	15.00
CSDS	10.00
COMMISSION 2%	
POSTAGE	9.69
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES/BILLING	15.00
	5.00
BILLING/PHONE/FAX	10.00
<b>TOTAL SHERIFF COSTS</b>	<b>238.05</b>

## DEED COSTS:

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	30.50
TRANSFER TAX 2%	
<b>TOTAL DEED COSTS</b>	<b>30.50</b>

## PLAINTIFF COSTS, DEBT & INTEREST:

DEBT-AMOUNT DUE	52,164.83
INTEREST	
TO BE ADDED TO SALE DATE	
ATTORNEY FEES	
PROTH. SATISFACTION	
LATE CHARGES & FEES	
COST OF SUIT -TO BE ADDED	
FORECLOSURE FEES/ESCROW DEFICIT	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	
SATISFACTION FEE	
ESCROW DEFICIENCY	
<b>TOTAL DEBT &amp; INTEREST</b>	<b>52,164.83</b>

## COSTS:

ADVERTISING	631.89
TAXES - collector	NONE
TAXES - tax claim	NONE
DUE	
LIEN SEARCH	200.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	31.00
SHERIFF COSTS	238.05
LEGAL JOURNAL AD	225.00
PROTHONOTARY	139.00
MORTGAGE SEARCH	80.00
MUNICIPAL LIEN	
<b>TOTAL COSTS</b>	<b>1,549.94</b>

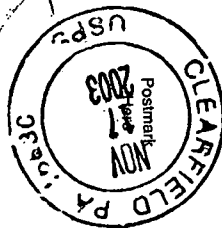
DISTRIBUTION WILL BE MADE IN ACCORDANCE WITH THE ABOVE SCHEDULE UNLESS EXCEPTIONS ARE FILED WITH THIS OFFICE **WITHIN TEN (10) DAYS FROM THIS DATE.**

CHESTER A. HAWKINS, Sheriff

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <i>[Signature]</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>[Signature]</i> Date of Delivery <i>11-19-03</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>1. Article Addressed to:</p> <p>William A. Tinker ISCI Old Highway 75, Imate # 07009068 Butner, NC 27509</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number</p> <p>(Transfer from service label) <i>7002 2410 0003 7224 1746</i></p> <p>PS Form 3811, August 2001 <i>Domestic Return Receipt</i> 102595-02-M-1540</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	

U.S. Postal Service <sup>TM</sup> RECEIPT	
<p>(Domestic Mail Only; No Insurance Coverage Provided)</p> <p>For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a></p>	
<p><b>OFFICIAL USE</b></p>	
<p>Postage \$ <i>60</i></p> <p>Certified Fee</p> <p>Return Receipt Fee (Endorsement Required)</p> <p>Restricted Delivery Fee (Endorsement Required)</p> <p>Total Postage &amp; Fees \$ <i>4.65</i></p>	<p>Sent To <i>William A. Tinker</i></p> <p>Street, Apt. No., <i>ISCI Old Highway 75, Imate #07009068</i></p> <p>City, State, ZIP+4<sup>®</sup> <i>Butner, NC 27509</i></p> <p>PS Form 3800, June 2002 See Reverse for Instructions</p>

7002 2410 0003 7224 1746



Law Offices  
**FEDERMAN AND PHELAN, LLP**  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814  
[Daniel.Trautz@fedphe-pa.com](mailto:Daniel.Trautz@fedphe-pa.com)

Dan G. Trautz  
Judgment Department, Ext. 1298

Representing Lenders in  
Pennsylvania and New Jersey

December 3, 2003

Office of the Sheriff  
Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830

ATTENTION: CINDY (814) 765-5915

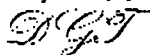
Re: WELLS FARGO HOME MORTGAGE, INC. v. WILLIAM A. TINKER CATHY J. TINKER  
No. 2003-183  
RD 4 BOX 375, DUBOIS, PA 15801

Dear Cindy:

Please postpone the Sheriff's Sale of the above referenced property, which is scheduled for  
December 5, 2003.

Please postpone to the January 9, 2004 sheriff sale date.

Very truly yours,



Dan G. Trautz

VIA TELFCOPY (814) 765-5915