

2003-270-CD  
CENDANT MORTGAGE CORPORATION  
VS  
MICHAEL J. ZIMMERMAN, ET AL.

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

CENDANT MORTGAGE CORPORATION  
4001 LEADENHALL ROAD  
MT. LAUREL, NJ 08054

Plaintiff

v.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830

Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

TERM

NO. 2003-270-CD

CLEARFIELD COUNTY

**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.

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

Loan #: 0012250759

**FILED**

FEB 26 2003

m/11:30/49  
William A. Shaw  
Prothonotary

2 CEN TO SHFF

**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

CENDANT MORTGAGE CORPORATION  
4001 LEADENHALL ROAD  
MT. LAUREL, NJ 08054

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

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830

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

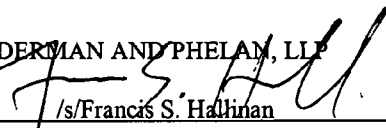
3. On 06/30/00 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No. 200009567. PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same.
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 10/01/2002 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	\$59,475.79
Interest	2,559.42
09/01/2002 through 02/24/2003 (Per Diem \$14.46)	
Attorney's Fees	1,250.00
Cumulative Late Charges	224.92
06/30/2000 to 02/01/2003	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 64,060.13
Escrow	
Credit	0.00
Deficit	329.33
Subtotal	<u>\$ 329.33</u>
<b>TOTAL</b>	<b>\$ 64,389.46</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. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.
9. This action does not come under Act 91 of 1983 because the mortgage is FHA-insured.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 64,389.46, together with interest from 02/24/2003 at the rate of \$14.46 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 lots or tracts of ground located and situate in Lawrence Township, Clearfield County, Pennsylvania, bounded and described as follows:

PARCEL 1 -

BEGINNING at a point on the northern side of a private road and the southeast corner of lot previously owned by James Hoyt and Margaret Hoyt, now or formerly owned by Harry J. Salvatore and Karen C. Salvatore; thence East one hundred (100) feet to a cement post; thence North one hundred eighty-six and one-half (186  $\frac{1}{2}$ ) feet (previously referred to incorrectly as eighty-six and one-half feet) to a point on the southeast corner of land now or formerly of James B. Hoyt and Margaret L. Hoyt; thence along land now or formerly of James W. Hoyt and Margaret L. Hoyt West one hundred (100) feet to a point on the northeast corner of lot formerly owned by James B. Hoyt and Margaret L. Hoyt, now or formerly owned by Harry J. Salvatore and Karen C. Salvatore; thence South one hundred eight-six and one-half (186  $\frac{1}{2}$ ) feet to a point and place of beginning.

PARCEL 2 -

BEGINNING at a point on a private road, said point being the southwest corner of the parcel of land previously conveyed by John K. Bankey to Malvin Daisher by a deed

dated September 28, 1945, and recorded in Deed Book 373 at Page 204; thence northerly along the line of said previous conveyance one hundred eighty-six and one-half (186  $\frac{1}{2}$ ) feet to a point; thence westerly fifty (50) feet to a point; thence southerly one hundred eighty-six and one-half (186  $\frac{1}{2}$ ) feet to a point on a private road; thence easterly along said private road fifty (50) feet to the place of beginning.

PARCEL 3 -

BEGINNING at an iron pipe, said pipe being the northern corner of land herein described and also being in the southern line of Lawrence Township, Route T-903; thence by land now or formerly of Samuel B. Yost and Jody F. Yost, also land now or formerly of Bonnie Haberl, South forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds West, three hundred twenty-seven and fifty-seven one-hundredths (327.57) feet to an iron bolt in the northern line of an unimproved road; thence by the northern line of said unimproved road, north twenty-eight (28) degrees twenty-five (25) minutes zero (00) seconds West, fifty and no hundredths (50.00) feet to an iron pipe; thence by land now or formerly of Ronald Bressler and Joyce Bressler, north forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds east, three hundred three and ninety-one one-hundredths (303.91) feet to an iron pipe in the southern line of the beforementioned T-903, south fifty-five (55) degrees forty-two minutes twenty-one (21) seconds east, fifty and twenty-two one-hundredths (50.22) feet to an iron pipe and place of beginning. Containing 0.35 acres.

PROPERTY ADDRESS: RR2 BOX 109

VERIFICATION

MARC J. HINKLE hereby states that he is V.P. of CENDANT MORTGAGE SERVICES mortgage servicing agent for Plaintiff in this matter, that he is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his knowledge, information and belief. 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.

Marc J. Hinkle

DATE: 02/19/03

25 Apr 03 Document  
Reinstated/~~Reinstated~~ to Sheriff/Attorney  
for service.  
William A. Shaw  
Deputy Prothonotary

7-30-03 Document  
Reinstated/~~Reinstated~~ to Sheriff/Attorney  
for service.  
William A. Shaw  
~~Deputy~~ Prothonotary

**FILED**

FEB 26 2003

William A. Shaw  
Prothonotary



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

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Attorney for Plaintiff

CENDANT MORTGAGE CORPORATION

: COURT OF COMMON PLEAS

Plaintiff

: CIVIL DIVISION

vs.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

: Clearfield County


Defendants

: No. 2003-270-CD

**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: April 23, 2003

CDC, Svc Dept.

**FILED**

APR 25 2003

William A. Shaw  
Prothonotary

FILED

Atty. Gen. 7.00

M 11:40 AM

APR 25 2003

2 Compl. Re-instated  
to shsf

William A. Shaw  
Prothonotary

3  
420

FEDERMAN AND PHELAN  
By: FRANK FEDERMAN, ESQUIRE  
Attorney I.D. No. 12248  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Attorney for Plaintiff

CENDANT MORTGAGE CORPORATION : COURT OF COMMON PLEAS

Vs. : CIVIL DIVISION

MICHAEL J. ZIMMERMAN : CLEARFIELD COUNTY

BAMBI L. ZIMMERMAN

: NO. 2003-270-CD

**AFFIDAVIT OF SERVICE OF COMPLAINT IN MORTGAGE FORECLOSURE  
PURSUANT TO Pa.R.C.P. 404(2)/403**

FRANK FEDERMAN, ESQUIRE, Attorney for Plaintiff, hereby certifies that service of the Complaint in Mortgage Foreclosure was made by sending a true and correct copy by certified mail to Defendant, **MICHAEL J. ZIMMERMAN** and **BAMBI L. ZIMMERMAN** at **RR2 BOX 109, CLEARFIELD, PA 16830** which Complaint was received by Defendant, **MIXHAEL J. ZIMMERMAN** and **BAMBI L. ZIMMERMAN**, on August 8, 2003 as evidenced by the attached Return Receipt. 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.

Date: August 8, 2003



Frank Federman, Esquire  
Attorney for Plaintiff

CDC, Svc Dept.

**FILED**

ml 12:50  
AUG 11 2003

no cc  
CJG

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

CENDANT MORTGGE CORPORATION

CLEARFIELD COUNTY

vs.

No.: 2003-270-CD

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

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 **MICHAEL J. ZIMMERMAN and BABMI L. ZIMMERMAN** on 10/23/03, at **RR2 BOX 109, CLEARFIELD, PA 16830, and 173 VARSITY ROAD, MASONTOWN, PA 15461** in accordance with the Order of Court dated 8/1/03.

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: October 27, 2003

FILED

NOV 05 2003

William A. Shaw  
Prothonotary/Clerk of Courts

FILED <sup>nb</sup>  
<sup>cc</sup>

~~3~~ 11:20 ~~2004~~  
NOV 05 2003

~~W~~ William A. Shaw  
Prothonotary/Clerk of Courts

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION – LAW

CENDANT MORTGGE CORPORATION

No.: 2003-270-CD

vs.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

**FILED**  
NOV 24 2003  
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 Praecept for the Writ of Execution was filed the following information concerning the real property located at:

RR2 BOX 109, CLEARFIELD, PA 16830.

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

CENDANT MORTGGE CORPORATION

CLEARFIELD COUNTY

No.: 2003-270-CD

vs.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

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

CENDANT MORTGGE CORPORATION, Plaintiff in the above action, by its attorney, Frank Federman, Esquire, sets forth as of the date the Praeipe for the Writ of Execution was filed the following information concerning the real property located at RR2 BOX 109, CLEARFIELD, PA 16830:

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)

GENERAL MOTORS ACCEPTANCE CORPORATION

C/O RUSSELL R. SANDERS, ESQUIRE  
3030 USX TOWER  
PITTSBURGH, P 15219-2782

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  
reasonably 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)

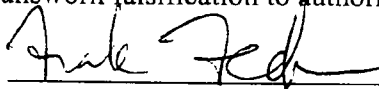
Commonwealth of Pennsylvania  
Department of Welfare

PO Box 2675  
Harrisburg, PA 17105

Tenant/Occupant

RR2 BOX 109  
CLEARFIELD, PA 16830

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

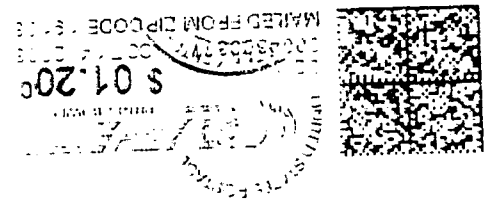
  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

September 5, 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/SZB

Line	Article Number	Name of Addressee, Street, and Post Office Address	Destination	Rate
1	MICHAEL J. ZIMMERMAN	Tenant/Occupant, RR2 BOX 109, CLEARFIELD, PA 16830		
2	001220759	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		GENERAL MOTORS ACCEPTANCE CORPORATION C/O RUSSELL R. SANDERS, ESQUIRE 3030 USX TOWER PITTSBURGH, P 15219-2782		
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				



**Total Number of Pieces Listed By Sender** **Total Number of Pieces Received at Post Office** **Postmaster, Per (Name Of Receiving Employee)**

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000.00 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.

**CLEARFIELD COUNTY**

September 5, 2003

CENDANT MORTGGE CORPORATION

No.: 2003-270-CD

vs.

MICHAEL J. ZIMMERMAN

BAMBI L.ZIMMERMAN

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

**TO: MICHAEL J. ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830**

**BAMBI L.ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830**

***\*\*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.\*\****

Your house (real estate) at RR2 BOX 109, CLEARFIELD, PA 16830, is scheduled to be sold at the Sheriff's Sale on \_\_\_\_\_ at \_\_\_\_\_ A.M., in the Clearfield County Courthouse, 1 North 2<sup>nd</sup> Street, Suite 116, Clearfield, PA 16830 to enforce the court judgment of **\$67,252.54**, obtained by **CENDANT MORTGGE CORPORATION**, (the mortgagee) against you. In the event the sale is continued, an announcement will be made at said sale in compliance with Pa.R.C.P., Rule 3129.3.

**NOTICE OF OWNER'S RIGHTS**

**YOU MAY BE ABLE TO PREVENT THIS SHERIFF'S SALE**

To prevent this Sheriff's Sale, you must take **immediate action**:

1. The sale will be cancelled if you pay to the mortgagee the back payments, late charges, costs and reasonable attorney's fees due. To find out how much you must pay, you may call: **(215) 563-7000**.
2. You may be able to stop the sale by filing a petition asking the Court to strike or open the judgment, if the judgment was improperly entered. You may also ask the Court to postpone the sale for good cause.
3. You may also be able to stop the sale through other legal proceedings.

You may need an attorney to assert your rights. The sooner you contact one, the more chance you will have of stopping the sale. (See notice on page two on how to obtain an attorney.)

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

CENDANT MORTGAGE CORPORATION

VS.

ZIMMERMAN, MICHAEL J. & BAMBI L.

COMPLAINT IN MORTGAGE FORECLOSURE

Sheriff Docket #

13738

03-270-CD

**SHERIFF RETURNS**

NOW MAY 2, 2003, GARY BROWNFIELD SR., SHERIFF OF FAYETTE COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON MICHAEL J. ZIMMERMAN, DEFENDANT.

NOW MAY 25, 2003 ATTEMPTED TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON MICHAEL J. ZIMMERMAN, DEFENDANT BY DEPUTIZING THE SHERIFF OF FAYETTE COUNTY. THE RETURN OF SHERIFF BROWNFIELD IS HERETO ATTACHED AND MADE A PART OF THIS RETURN MARKED "NOT FOUND".

NOW JULY 9, 2003 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED" AS TO BAMBI L. ZIMMERMAN, DEFENDANT. ATTEMPTED NOT HOME.

**Return Costs**

Cost	Description
44.00	SHERIFF HAWKINS PAID BY: ATTY CK# 263168
20.00	SURCHARGE PAID BY: ATTY CK# 267689 & 263109
85.99	FAYETTE COUNTY SHERIFF PAID BY: ATTY. CK# 271613

Sworn to Before Me This

9<sup>th</sup> Day Of July, 2003

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

So Answers,

Chester A. Hawkins  
Chester A. Hawkins  
Sheriff

**FILED**

013:30-60  
JUL 09 2003


William A. Shaw  
Prothonotary


FAYETTE COUNTY PENNSYLVANIA  
AFFIDAVIT OF NON SERVICE

PLACE OF ORIGIN: CLEARFIELD COUNTY, PA.  
COURT NUMBER: 2003 OF 270 CD  
TYPE OF WRIT/COMPLAINT: MORTGAGE FORECLOSURE  
PLAINTIFF(S): CENDANT MORTGAGE CORP.  
DEFENDANT(S): MICHAEL J ZIMMERMAN  
PLAINTIFF ATTY: FEDERMAN & PHELAN  
NAME OF ENTITY TO SERVE: MICHAEL J ZIMMERMAN  
ADDRESS: 173 VARSITY RD, MASONTOWN, PA,  
PLACE OF SERVICE: 173 VARSITY RD, MASONTOWN, PA,  
DATE & TIME OF SERVICE: MAY 25, 2003 00:00 AM  
COSTS: 85.99

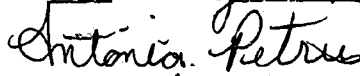
I HEREBY CERTIFY AND RETURN THAT I, ERNEST R KOPICH, DEPUTY, DID NOT FIND THE ABOVE NAMED INDIVIDUAL, COMPANY, CORPORATION ETC., AT THE PLACE OF SERVICE SHOWN ABOVE.

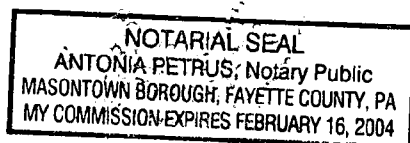
WITNESS MY HAND AND SEAL OF THE SHERIFF'S OFFICE, AT UNIONTOWN,  
PENNSYLVANIA THIS 18TH DAY OF JUNE, 2003 SO ANSWERS GARY D. BROWNFIELD SR.,  
SHERIFF.

  
ERNEST R. KOPICH, DEPUTY

  
GARY D. BROWNFIELD SR.  
SHERIFF OF FAYETTE COUNTY

SWORN TO AND SUBSCRIBED BEFORE ME  
THIS 18 DAY OF June 2003





RECEIVED FROM DATE 6/18/2003  
RECEIPT NO. 6841 ENVELOPE NO. K 996  
RECEIPT AMOUNT 85.99 RECEIVED BY TP

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

CENDANT MORTGAGE CORPORATION  
4001 LEADENHALL ROAD  
MT. LAUREL, NJ 08054

Plaintiff

v.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830

Defendant(s)

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

**NOTICE**

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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.

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

Loan #: 0012250759

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

FEB 20 2003

Attest.

*William A. B...*  
Prothonotary/  
Clerk of Courts

4-25-03 Document  
Reinstated/Referred to Sheriff/Attorney  
for service. *William A. B...*

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

**SERVE**

TERM

NO. 2003-270-C9

CLEARFIELD COUNTY

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

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.

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UNTIL THE END OF THE THIRTY (30) DAY  
PERIOD FOLLOWING FIRST CONTACT WITH  
YOU BEFORE SUING YOU TO COLLECT THIS  
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TO BE FILED IN THIS ACTION WITHIN TWENTY  
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WILL BE MADE TO THE COURT FOR A  
JUDGMENT UNTIL THE EXPIRATION OF THIRTY  
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ADDRESS OF THE ORIGINAL CREDITOR WITHIN  
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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

CENDANT MORTGAGE CORPORATION  
4001 LEADENHALL ROAD  
MT. LAUREL, NJ 08054

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

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830

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

3. On 06/30/00 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No. 200009567. PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same.
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 10/01/2002 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	\$59,475.79
Interest	2,559.42
09/01/2002 through 02/24/2003 (Per Diem \$14.46)	
Attorney's Fees	1,250.00
Cumulative Late Charges	224.92
06/30/2000 to 02/01/2003	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 64,060.13
Escrow	
Credit	0.00
Deficit	329.33
Subtotal	<u>\$ 329.33</u>
<b>TOTAL</b>	<b>\$ 64,389.46</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. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.
9. This action does not come under Act 91 of 1983 because the mortgage is FHA-insured.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 64,389.46, together with interest from 02/24/2003 at the rate of \$14.46 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 lots or tracts of ground located and situate in Lawrence Township, Clearfield County, Pennsylvania, bounded and described as follows:

PARCEL 1 -

BEGINNING at a point on the northern side of a private road and the southeast corner of lot previously owned by James Hoyt and Margaret Hoyt, now or formerly owned by Harry J. Salvatore and Karen C. Salvatore; thence East one hundred (100) feet to a cement post; thence North one hundred eighty-six and one-half (186  $\frac{1}{2}$ ) feet (previously referred to incorrectly as eighty-six and one-half feet) to a point on the southeast corner of land now or formerly of James B. Hoyt and Margaret L. Hoyt; thence along land now or formerly of James B. Hoyt and Margaret L. Hoyt West one hundred (100) feet to a point on the northeast corner of lot formerly owned by James B. Hoyt and Margaret L. Hoyt, now or formerly owned by Harry J. Salvatore and Karen C. Salvatore; thence South one hundred eighty-six and one-half (186  $\frac{1}{2}$ ) feet to a point and place of beginning.

PARCEL 2 -

BEGINNING at a point on a private road, said point being the southwest corner of the parcel of land previously conveyed by John K. Bankey to Melvin Daisher by a deed

dated September 28, 1943, and recorded in Deed Book 373 at Page 204; thence northerly along the line of said previous conveyance one hundred eighty-six and one-half (186  $\frac{1}{2}$ ) feet to a point; thence westerly fifty (50) feet to a point; thence southerly one hundred eighty-six and one-half (186  $\frac{1}{2}$ ) feet to a point on a private road; thence easterly along said private road fifty (50) feet to the place of beginning.

PARCEL 3 -

BEGINNING at an iron pipe, said pipe being the northern corner of land herein described and also being in the southern line of Lawrence Township, Route T-903; thence by land now or formerly of Samuel B. Yost and Jody P. Yost, also land now or formerly of Bonnie Haberl, South forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds West, three hundred twenty-seven and fifty-seven one-hundredths (327.57) feet to an iron bolt in the northern line of an unimproved road; thence by the northern line of said unimproved road, North twenty-eight (28) degrees twenty-five (25) minutes zero (00) seconds West, fifty and no hundredths (50.00) feet to an iron pipe; thence by land now or formerly of Ronald Bressler and Joyce Bressler, north forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds east, three hundred three and ninety-one one-hundredths (303.91) feet to an iron pipe in the southern line of the beforementioned T-903, south fifty-five (55) degrees forty-two minutes twenty-one (21) seconds east, fifty and twenty-two one-hundredths (50.22) feet to an iron pipe and place of beginning. Containing 0.35 acres.

PROPERTY ADDRESS: RR2 BOX 109

VERIFICATION

MARC J. HINKLE hereby states that he is V.P. of CENDANT MORTGAGE SERVICES mortgage servicing agent for Plaintiff in this matter, that he is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his knowledge, information and belief. 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.

Marc J. Hinkle

DATE: 02/19/03

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

CENDANT MORTGAGE CORPORATION  
4001 LEADENHALL ROAD  
MT. LAUREL, NJ 08054

Plaintiff

v.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830

Defendant(s)

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

**NOTICE**

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

Loan #: 0012250759

I hereby certify this to be a true  
and attested copy of the original  
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FEB 26 2003

Attest.

*William L. Shaw*  
Prothonotary/  
Clerk of Courts

4-25-03 Document  
Reinstated/Reassigned to Sheriff/Attorney  
for service. *William L. Shaw*  
Deputy Prothonotary  
ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

TERM

NO. 2003 - 270 - C9

CLEARFIELD COUNTY

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BAMBI L. ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830

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FEDERMAN AND PHELAN, LLP

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

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PROPERTY ADDRESS: RR2 BOX 109

VERIFICATION

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Marc J. Hinkle

DATE: 02/19/03



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

CENDANT MORTGAGE CORPORATION

Plaintiff

vs.

MICHAEL J. ZIMMERMAN  
BAMBI ZIMMERMAN

Defendants

: COURT OF COMMON PLEAS

: CIVIL DIVISION

: CLEARFIELD County

: No. 2003-270-CD

**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.

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

Date: July 28, 2003

/cdc, Svc Dept.

**FILED**

M 11:18 BA PL 7.00  
JUL 30 2003 1 reinstated to atty-

William A. Shaw  
Prothonotary

FF/kmk

FEDERMAN AND PHELAN

ATTORNEY FOR PLAINTIFF

BY: Francis S. Hallinan, Esq.

Atty. I.D. # 62695

1617 John F. Kennedy Boulevard Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

CENDANT MORTGAGE  
CORPORATION

COURT OF COMMON PLEAS

CIVIL DIVISION

Vs.

CLEARFIELD COUNTY

MICHAEL J. ZIMMERMAN

BABMI L. ZIMMERMAN

NO. 2003-270-CD

**FILED**

**JUL 30 2003**

William A. Shaw  
Prothonotary/Clerk of Courts

**CERTIFICATION OF SERVICE**

I, Francis S. Hallinan, Esquire, herby certify that a copy of the Motion for Service Pursuant to Special Order of Court has been sent to the individual(s) as indicated below by first class mail, postage prepaid, on the date listed below.

MICHAEL J. ZIMMERMAN AND BABMI L. ZIMMERMAN at:

RR2 BOX 109

CLEARFIELD, PA 16830

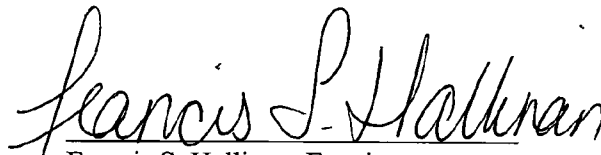
&

173 VARSITY ROAD

MASONTOWN, PA 15461

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

Date: July 28, 2003



Francis S. Hallinan, Esquire  
Attorney for Plaintiff

FILED NO  
cc  
JUL 30 2003  
KEP

William A. Shaw  
Prothonotary/Clerk of Courts

FEDERMAN AND PHELAN  
BY: Francis S. Hallinan, Esq.  
Atty. I.D. # 62695  
1617 John F. Kennedy Boulevard Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CENDANT MORTGAGE  
CORPORATION

COURT OF COMMON PLEAS

CIVIL DIVISION

CLEARFIELD COUNTY

NO. 2003-270-CD

vs.

MICHAEL J. ZIMMERMAN  
BABMI L. ZIMMERMAN

**ORDER**

AND NOW, this 16<sup>th</sup> day of August, 2003, upon consideration of Plaintiff's Motion for Service Pursuant to Special Order of Court and the Affidavit of Reasonable Investigation attached thereto, it is hereby **ORDERED** that Plaintiff may obtain service of the Complaint on the above captioned Defendant(s) **MICHAEL J. ZIMMERMAN AND BABMI L. ZIMMERMAN**, by mailing a true and correct copy of the Complaint by certified mail and regular mail to the Defendant's last known address, and to the mortgaged premises located at **RR2 BOX 109, CLEARFIELD, PA 16830**.

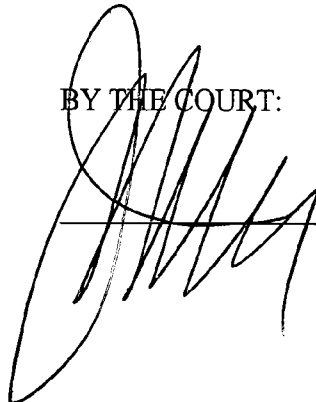
Service of the aforementioned mailings is effective upon the date of mailing and is to be done by Plaintiff's attorney, who will file with the Prothonotary's Office an Affidavit as to the mailing.

BY THE COURT:

**FILED**

AUG 01 2003

William A. Shaw  
Prothonotary

  
J.

**FILED**  
D 1:39 PM 102 K *9/2/2003*  
AUG 01 2003

AUG 01 2003

**William A. Shaw**  
Prothonotary

FEDERMAN AND PHELAN  
BY: Francis S. Hallinan, Esq.  
Atty. I.D. # 62695  
1617 John F. Kennedy Boulevard Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

---

ATTORNEY FOR PLAINTIFF

CENDANT MORTGAGE  
CORPORATION

vs.

MICHAEL J. ZIMMERMAN  
BABMI L. ZIMMERMAN

: COURT OF COMMON PLEAS  
:  
:  
: CIVIL DIVISION  
:  
: CLEARFIELD COUNTY  
:  
: NO. 2003-270-CD

**FILED**

**JUL 30 2003**

William A. Shaw  
Prothonotary/Clerk of Courts

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT.  
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NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO  
COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST  
PROPERTY.

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

Plaintiff, by its counsel, Francis S. Hallinan, Esquire, moves this Honorable Court for an Order directing service of the Complaint upon the above-captioned Defendant(s) by Certified mail and regular mail to the Defendant's last known address and mortgaged premises located at RR2 BOX 109, CLEARFIELD, PA 16830 and in support thereof avers the following:

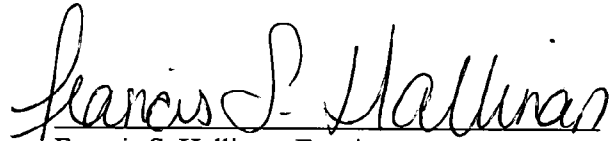
1. Attempts to serve Defendant(s) with the Complaint have been unsuccessful. Sheriff attempted to serve the defendants at the property located at RR2 BOX 109, CLEARFIELD, PA 16830 and no service was made as the defendants were not found at the property. A mailing address was received for Michael at 173 VARSITY ROAD, MASONTOWN, PA 15461 and again no service was made as Michael was not found at this address, indicated by the Sheriff's Return 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(s). An Affidavit of Reasonable Investigation setting forth the specific inquiries made and the results is attached hereto as Exhibit "B".

3. Internal records reviewed by Plaintiff and has not been contacted by defendant as of July 28, 2003 to bring loan current.

4. Plaintiff submits that it has made a good faith effort to locate the defendants, but has been unable to do so.

**WHEREFORE**, Plaintiff respectfully requests this Honorable Court enter an Order pursuant to Pennsylvania Rule of Civil Procedure 430 directing service of the Complaint by certified mail and regular mail.

  
Francis S. Hallinan, Esquire

FEDERMAN AND PHELAN  
BY: Francis S. Hallinan, Esq.  
Atty. I.D. # 62695  
1617 John F. Kennedy Boulevard Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000  
CENDANT MORTGAGE CORPORATION

ATTORNEY FOR PLAINTIFF

vs.

MICHAEL J. ZIMMERMAN  
BABMI L. ZIMMERMAN

COURT OF COMMON PLEAS  
CIVIL DIVISION  
CLEARFIELD COUNTY  
NO. 2003-270-CD

**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(s) and the reasons why service cannot be made.

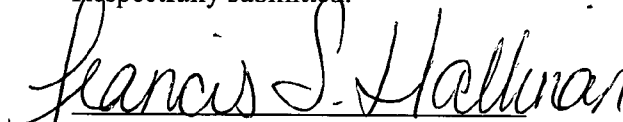
Note: A Sheriff's return of "Not Found" or the fact that a Defendant has moved without leaving a new forwarding address is insufficient evidence of concealment. Gonzales vs. Polis, 238 Pa. Super. 362, 357 A.2d 580 (1976). "Notice of intended adoption mailed to last known address requires a good faith 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 Sheriff's Return of Service, attached hereto and marked as Exhibit "A", the Sheriff has been unable to serve the Complaint. A good faith effort to discover the whereabouts of the Defendant(s) has been made as evidenced by the attached Affidavit of Reasonable Investigation, marked Exhibit "B".

**WHEREFORE**, Plaintiff respectfully requests service of the Complaint by certified mail and regular mail.

Respectfully submitted:

  
Francis S. Hallinan, Esquire



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

CENDANT MORTGAGE CORPORATION

VS.

ZIMMERMAN, MICHAEL J. & BAMBI L.

COMPLAINT IN MORTGAGE FORECLOSURE

Sheriff Docket # 13738  
03-270-CD **COPY**

**SHERIFF RETURNS**

NOW MAY 2, 2003, GARY BROWNFIELD SR., SHERIFF OF FAYETTE COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON MICHAEL J. ZIMMERMAN, DEFENDANT.

NOW MAY 25, 2003 ATTEMPTED TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON MICHAEL J. ZIMMERMAN, DEFENDANT BY DEPUTIZING THE SHERIFF OF FAYETTE COUNTY. THE RETURN OF SHERIFF BROWNFIELD IS HERETO ATTACHED AND MADE A PART OF THIS RETURN MARKED "NOT FOUND".

NOW JULY 9, 2003 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED" AS TO BAMBI L. ZIMMERMAN, DEFENDANT. ATTEMPTED NOT HOME.


**Return Costs**

Cost	Description
44.00	SHERIFF HAWKINS PAID BY: ATTY CK# 263168
20.00	SURCHARGE PAID BY: ATTY CK# 267689 & 263109
85.99	FAYETTE COUNTY SHERIFF PAID BY: ATTY. CK# 271613

Sworn to Before Me This

\_\_\_\_ Day Of \_\_\_\_\_ 2003

So Answers,



Chester A. Hawkins  
Sheriff

**EXHIBIT A**

FAYETTE COUNTY PENNSYLVANIA  
AFFIDAVIT OF NON SERVICE

COPY

PLACE OF ORIGIN: CLEARFIELD COUNTY, PA.

COURT NUMBER: 2003 OF 270 CD

TYPE OF WRIT/COMPLAINT: MORTGAGE FORECLOSURE

PLAINTIFF(S): CENDANT MORTGAGE CORP.

DEFENDANT(S): MICHAEL J ZIMMERMAN

PLAINTIFF ATTY: FEDERMAN & PHELAN

NAME OF ENTITY TO SERVE: MICHAEL J ZIMMERMAN

ADDRESS: 173 VARSITY RD, MASONTOWN, PA,

PLACE OF SERVICE: 173 VARSITY RD, MASONTOWN, PA,

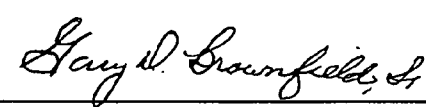
DATE & TIME OF SERVICE: MAY 25, 2003 00:00 AM

COSTS: 85.99

I HEREBY CERTIFY AND RETURN THAT I, ERNEST R KOPICH, DEPUTY, DID NOT FIND THE ABOVE NAMED INDIVIDUAL, COMPANY, CORPORATION ETC., AT THE PLACE OF SERVICE SHOWN ABOVE.

WITNESS MY HAND AND SEAL OF THE SHERIFF'S OFFICE, AT UNIONTOWN, PENNSYLVANIA THIS 18TH DAY OF JUNE, 2003 SO ANSWERS GARY D. BROWNFIELD SR., SHERIFF.

  
ERNEST R. KOPICH, DEPUTY

  
GARY D. BROWNFIELD SR.  
SHERIFF OF FAYETTE COUNTY

SWORN TO AND SUBSCRIBED BEFORE ME  
THIS 18 DAY OF June 2003



NOTARIAL SEAL  
ANTONIA PETRUS, Notary Public  
MASONTOWN BOROUGH, FAYETTE COUNTY, PA  
MY COMMISSION EXPIRES FEBRUARY 16, 2004

RECEIVED FROM DATE 6/18/2003  
RECEIPT NO. 6841 ENVELOPE NO. K 996  
RECEIPT AMOUNT 85.99 RECEIVED BY TP

EXHIBIT A

**EKL DATA, INC**  
**AFFIDAVIT OF GOOD FAITH INVESTIGATION**

Loan Number:

File Number:

Attorney Firm: **Federman & Phelan**

Subject: **Michael J. Zimmerman**  
**Bambi L. Zimmerman**

Property Address **RR 2 Box 109**  
**Clearfield, PA 16830**

Last Known Address: **RR 2 Box 109**  
**Clearfield, PA 16830**

Current Address: **RR 2 Box 109**  
As of March 7, 2003 **Clearfield, PA 16830**

Last Known Number: **non-published**

George H. Lewis, III, being duly sworn according to law, deposes and says:

1. I am employed in the capacity of researcher for EKL DATA, INC.
2. On March 7, 2003, I conducted an investigation into the whereabouts of the above named defendant(s). The results of my investigation are as follows:

I. Credit Information

A. Social Security Number

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

1. **Michael J. Zimmerman: 205-56-5655**
2. **Bambi L. Zimmerman: 169-60-7092**

B. Employment Search:

**Michael J. Zimmerman and Bambi L. Zimmerman - A review of the credit report provided no employment information.**

C. Inquiry of Creditors:

**The creditors indicated that Michael J. Zimmerman and Bambi L. Zimmerman reside at: RR 2 Box 109, Clearfield, PA 16830.**

II. Inquiry of Telephone Company

A. Directory Assistance Search:

**On March 7, 2003 our office contacted directory assistance, which indicated that the mortgagors telephone number is non-published at RR 2 Box 109, Clearfield, PA 16830.**

III. Inquiry of Neighbors

**Our office, using an Internet database that supplies neighboring telephone numbers, made every attempt to contact the neighbors of RR 2 Box 109, Clearfield, PA 16830, but none could verify that the above-mentioned mortgagors do reside at RR 2 Box 109.**

**EXHIBIT B**

**EKL DATA, INC**  
**AFFIDAVIT OF GOOD FAITH INVESTIGATION**

IV. Inquiry of Post Office

A. National Address Update:

Our inquiry with the National Address database on March 7, 2003 indicates that the following is correct: Michael J. Zimmerman and Bambi L. Zimmerman- RR 2 Box 109, Clearfield, PA 16830.

B. Additional Active Mailing Addresses

Our research has not located any other additional mailing addresses for the above-mentioned mortgager.

V. Inquiry of DMV

Per the Pennsylvania Department of Motor Vehicles Michael J. Zimmerman and Bambi L. Zimmerman has a valid identification registration with the state.

VI. Other Inquiries

A. Death Records:

As of January 1, 2003, there is no record for the above-mentioned mortgagor or mortgagor's social security number on file with the Social Security Death Index.

B. Public Licenses

None Found

C. County Voter Registration:

On March 6, 2003, our office, using a database of all registered voters in the state of Pennsylvania, confirmed that the county doesn't have Michael J. Zimmerman and does have Bambi L. Zimmerman listed as a registered voter with an address of RR 2 Box 109, Clearfield, PA 16830.

D. D.O.B.:

Michael J. Zimmerman: 10/17/1976

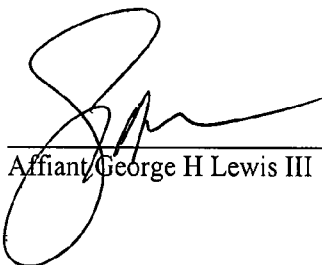
Bambi L. Zimmerman: 2/16/1978

E. Miscellaneous Information

None

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 George H Lewis III

Subscribed and sworn before me on March 7, 2003.

  
Notary Public

Notarial Seal  
Karyn M. Smyth, Notary Public  
Haverford Twp., Delaware County  
My Commission Expires Mar. 29, 2004  
Member, Pennsylvania Association of Notaries

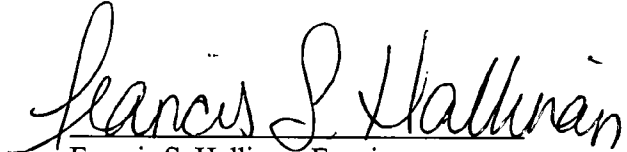
**EXHIBIT B**

**VERIFICATION**

**Francis S. Hallinan, 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 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.

Date: July 28, 2003

  
Francis S. Hallinan, Esquire

FILED NO  
cc  
# 11/03  
JUL 30 2003

William A. Shaw  
Prothonotary/Clerk of Courts

CA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CENDANT MORTGGE CORPORATION  
4001 LEADENHALL ROAD  
MT. LAUREL, NJ 08054

No.: 2003-270-CD

vs.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830

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

TO THE PROTHONOTARY:

Kindly enter an in rem judgment in favor of the Plaintiff and against MICHAEL J. ZIMMERMAN and BAMBI L. ZIMMERMAN, 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	\$64,389.46
Interest (2/24/03 to 9/9/03)	<u>2,863.08</u>
<b>TOTAL</b>	<b>\$67,252.54</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 9, 2003

  
PRO PROTHY

SZB

**FILED**

SEP 09 2003

William  
Prothonotary/Clerk of Court

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

CENDANT MORTGAGE CORPORATION  
Plaintiff

: COURT OF COMMON PLEAS

Vs.

: CIVIL DIVISION

MICHAEL J. ZIMMERMAN

: CLEARFIELD COUNTY

BAMBI L. ZIMMERMAN

: NO. 2003-270-CD

Defendants

TO: BAMBI L. ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830

DATE OF NOTICE: AUGUST 29, 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  
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

CENDANT MORTGAGE CORPORATION  
Plaintiff

: COURT OF COMMON PLEAS

: CIVIL DIVISION

Vs.

: CLEARFIELD COUNTY

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN  
Defendants

: NO. 2003-270-CD

TO: MICHAEL J. ZIMMERMAN  
RR2 BOX 109  
CLEARFIELD, PA 16830

DATE OF NOTICE: AUGUST 29, 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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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

CENDANT MORTGGE CORPORATION

CLEARFIELD COUNTY

vs.

No.: 2003-270-CD

MICHAEL J. ZIMMERMAN

BAMBI L. ZIMMERMAN

**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, MICHAEL J. ZIMMERMAN, is over 18 years of age, and resides at RR2 BOX 109, CLEARFIELD, PA 16830 .

(c) that defendant, BAMBI L. ZIMMERMAN, is over 18 years of age, and resides at RR2 BOX 109, CLEARFIELD, PA 16830.

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

SEP 09 2003

100 a Notice to each Def.

Statement to Atty

William A. Shaw

Prothonotary/Clerk of Courts

Atty pd. 20.00

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

CENDANT MORTGGE CORPORATION

Plaintiff

vs.

No.: 2003-270-CD

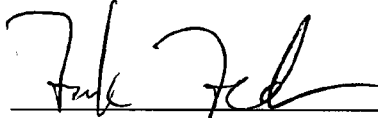
MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

Defendant(s)

Notice is given that a Judgment in the above captioned matter has been entered  
against you on September 9, 2003.

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

If you have any questions concerning this matter please contact:

  
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.\*\***

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

Cendant Mortgage Corporation  
Plaintiff(s)

No.: 2003-00270-CD

Real Debt: \$67,252.54

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Michael J. Zimmerman  
Bambi Zimmerman  
Defendant(s)

Entry: \$20.00

Instrument: In Rem Judgment

Date of Entry: September 9, 2003

Expires: September 9, 2008

Certified from the record this 9th day of September, 2003.

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

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

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

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

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

---

**CENDANT MORTGGE CORPORATION**

---

**vs.**

---

**MICHAEL J. ZIMMERMAN**  
**BAMBI L.ZIMMERMAN**

---

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

**No. 2003-270-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

\$67,252.54

Interest from 9/9/03 to  
Date of Sale (\$11.06 per diem)

\_\_\_\_\_ and Costs.

*\$139.00 Prothonotary Costs*



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.

SZB

**FILED**

**SEP 09 2003**

William A. Shaw  
Prothonotary/Clerk of Courts

No. 2003-270-CD

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CENDANT MORTGGE CORPORATION

vs.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

William A. Shaw  
Prothonotary/Clerk of Courts

FILED  
m 12:51 PM  
SEP 09 2003  
w/prop. desc. to  
Shiff  
Att. pd. 20.00  
67

PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)



Attorney for Plaintiff(s)

Address: RR2 BOX 109, CLEARFIELD, PA 16830  
RR2 BOX 109, CLEARFIELD, PA 16830  
Where papers may be served.

CLEARFIELD COUNTY

CENDANT MORTGGE CORPORATION

No.: 2003-270-CD

vs.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

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

CENDANT MORTGGE CORPORATION, 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 RR2 BOX 109, CLEARFIELD, PA 16830:

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

Name

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

MICHAEL J. ZIMMERMAN

RR2 BOX 109  
CLEARFIELD, PA 16830

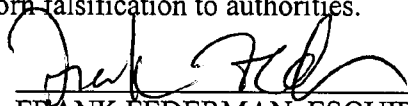
BAMBI L. ZIMMERMAN

RR2 BOX 109  
CLEARFIELD, PA 16830

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

September 5, 2003



CENDANT MORTGGE CORPORATION

CLEARFIELD COUNTY

No.: 2003-270-CD

vs.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

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

CENDANT MORTGGE CORPORATION, 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 RR2 BOX 109, CLEARFIELD, PA 16830:

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)
------	---

GENERAL MOTORS ACCEPTANCE CORPORATION	C/O RUSSELL R. SANDERS, ESQUIRE 3030 USX TOWER PITTSBURGH, P 15219-2782
---------------------------------------	---

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)

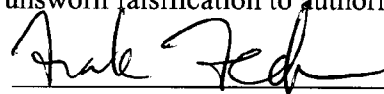
Commonwealth of Pennsylvania  
Department of Welfare

PO Box 2675  
Harrisburg, PA 17105

Tenant/Occupant

RR2 BOX 109  
CLEARFIELD, PA 16830

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

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

September 5, 2003

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

\_\_\_\_\_  
**CENDANT MORTGGE CORPORATION**  
\_\_\_\_\_

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

\_\_\_\_\_  
**vs.**  
\_\_\_\_\_

**NO.: 2003-270-CD**

\_\_\_\_\_  
**MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN**  
\_\_\_\_\_

**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: RR2 BOX 109, CLEARFIELD, PA 16830**

**(See legal description attached.)**

Amount Due

\$67,252.54

Interest from 9/9/03 to  
Date of Sale (\$11.06 per diem)

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

Total

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

*139.00 Prothonotary costs*

*Willi L. Lisher*  
\_\_\_\_\_

Prothonotary, Common Pleas Court of  
Clearfield County, Pennsylvania

Dated September 9, 2003  
(SEAL)

By:

~~Deputy~~

SZB

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

\_\_\_\_\_  
**CENDANT MORTGGE CORPORATION**  
\_\_\_\_\_

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

\_\_\_\_\_  
**vs.**  
\_\_\_\_\_

**NO.: 2003-270-CD**

\_\_\_\_\_  
**MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN**  
\_\_\_\_\_

**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: RR2 BOX 109, CLEARFIELD, PA 16830**

**(See legal description attached.)**

Amount Due

\$67,252.54

Interest from 9/9/03 to  
Date of Sale (\$11.06 per diem)

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

Total

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

*139.00 Prothonotary costs*

*William L. Haney*

\_\_\_\_\_  
Prothonotary, Common Pleas Court of  
Clearfield County, Pennsylvania

Dated September 9, 2003  
(SEAL)

By:

Deputy

SZB

No. 2003-270-CD

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

CENDANT MORTGGE CORPORATION

VS.

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

---

**WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

---


Real Debt \$67,252.54

Int. from 9/9/03 \_\_\_\_\_  
to Date of Sale (\$11.06 per diem)

Costs \_\_\_\_\_

Prothy. Pd. 139.00

Sheriff \_\_\_\_\_

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

Address: RR2 BOX 109, CLEARFIELD, PA 16830  
RR2 BOX 109, CLEARFIELD, PA 16830

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 lots or tracts of ground located and situate in Lawrence Township, Clearfield County, Pennsylvania, bounded and described as follows:

PARCEL 1 -

BEGINNING at a point on the Northern side of a private road and the Southeast corner of lot previously owned by James Hoyt and Margaret Hoyt, now or formerly owned by Harry J. Salvatore and Karen C. Salvatore; thence East one hundred (100) feet to a cement post; thence North one hundred eighty-six and one-half (186 1/2) feet (previously referred to incorrectly as eighty-six and one-half feet) to a point on the Southeast corner of land now or formerly of James H. Hoyt and Margaret L. Hoyt; thence along land now or formerly of James H. Hoyt and Margaret L. Hoyt West one hundred (100) feet to a point on the Northeast corner of lot formerly owned by James H. Hoyt and Margaret L. Hoyt, now or formerly owned by Harry J. Salvatore and Karen G. Salvatore; thence South one hundred eighty-six and one-half (186 1/2) feet to a point and place of beginning.

PARCEL 2 -

BEGINNING at a point on a private road, said point being the Southwest corner of the parcel of land previously conveyed by John K. Bankey to Melvin Daisher by a deed dated September 28, 1945, and recorded in Deed Book 373 at Page 204; thence Northerly along the line of said previous conveyance one hundred eighty-six and one-half (186 1/2) feet to a point; thence Westerly fifty (50) feet to a point; thence Southerly one hundred eighty-six and one-half (186 1/2) feet to a point on a private road; thence Easterly along said private road fifty (50) feet to the place of beginning.

PARCEL 3 -

BEGINNING at an iron pipe, said pipe being the Northern corner of land herein described and also being in the Southern line of Lawrence Township, Route T-903; thence by land now or formerly of Samuel B. Yost and Jody F. Yost, also land now or formerly of Bonnie Haberl, South forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds West, three hundred twenty-seven and fifty-seven one-hundredths (327.57) feet to an iron bolt in the Northern line of an unimproved road; thence by the Northern line of said unimproved road; North twenty-eight (28) degrees twenty-five (25) minutes zero (00) seconds West, fifty and no hundredths (50.00) feet to an iron pipe; thence by land now or formerly of Ronald Bressler and Joyce Bressler, North forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds East, three hundred three and ninety-one one-hundredths (303.91) feet to an iron pipe in the Southern line of the beforementioned T-903, South fifty-five (55) degrees forty-two minutes twenty-one (21) seconds East, fifty and twenty-two one-hundredths (50.22) feet to an iron pipe and place of beginning. Containing 0.35 acres.

PARCEL 4 -

BEGINNING at an iron pipe, said pipe being the Northern corner of land now or formerly of William M. Daisher and Elizabeth J. Brothers and also being in the Southern line of Lawrence Township Route T-903; thence by land now or formerly of William M. Daisher and Elizabeth J. Brothers South forty-eight (48) degrees twenty-five (25) minutes fifty-six (56) seconds West, one hundred sixty-four and seventy-one one-hundredths (164.71) feet to an iron pipe; thence by land now or formerly of Bonnie K. Haberl, North twenty-eight (28) degrees twenty-five (25) minutes zero (00) seconds West, fifty and no hundredths (50.00) feet to an iron pipe in line of land now or formerly of Melvin W. Daisher; thence by land now or formerly of Melvin W. Daisher, North forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds East one hundred forty-one and seven one-hundredths (141.07) feet to an iron pipe in the Southern line of the before mentioned T-903; thence by the Southern line of T-903, South fifty-five (55) degrees forty-two (42) minutes twenty-one (21) seconds East, fifty and twenty-one one-hundredths (50.21) feet to an iron pipe and place of beginning. Containing 0.17 acres.

BEGINNING at an iron pipe on Township Road T-903; thence South eight (8) degrees twenty-one (21) minutes forty-three (43) seconds West, a distance of one hundred fifty-one and twenty-seven hundredths (151.27) feet to an iron pipe; thence South forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds West, a distance of seventy-one and seventy one-hundredths (71.70) feet to an iron pipe; thence North twenty-eight (28) degrees twenty-five (25) minutes West, a distance of one hundred (100) feet to an iron pipe; thence North forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds East, a distance of one hundred sixty-four and seventy-one one-hundredths (164.71) feet to an iron pipe and place of beginning. Consisting of 0.264 acres.

Tax Parcel# 123-K6-657-9

TITLE TO SAID PREMISES IS VESTED IN Michael J. Zimmerman and Bambi L. Zimmerman, husband and wife by Deed from Dale W. Wanner and Charlinda A. Wanner, husband and wife dated 6/29/2000 and recorded 7/7/2000 in Instrument# 200009566.

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

Sheriff Docket # 14632

CENDANT MORTGAGE CORPORATION

03-270-CD

VS.

ZIMMERMAN, MICHAEL J.

WRIT OF EXECUTION      REAL ESTATE

**SHERIFF RETURNS**

NOW, OCTOBER 22, 2003 @ 10:45 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.

SERVED MICHAEL L. ZIMMERMAN AND BAMBI L. ZIMMERMAN BY REGULAR AND CERTIFIED MAIL PER COURT ORDER DATED AUGUST 1, 2003.

NOW, NOVEMBER 18, 2003 SERVED BAMBI ZIMMERMAN, DEFENDANT, BY CERTIFIED MAIL, SIGNED FOR BY THE DEFENDANT, TO RR #2, BOX 109 CLEARFIELD, PENNSYLVANIA CERTIFIED #70022410000372241692. CERTIFIED MAIL TO 173 VARSITY ROAD MASONTOWN, PA 15461 WAS RETURNED UNCLAIMED. CERTIFIED #70022410000372241715.

ALSO MAILED 11/6/03 REGULAR MAIL TO 173 VARSITY ROAD MASONTOWN, PA 15461 AND RR 2, BOX 109 CLEARFIELD, PA 16830. THEY WERE NOT RETURNED TO THE SHERIFF'S OFFICE.

NOW, NOVEMBER 6, 2003 SERVED MICHAEL J. ZIMMERMAN, DEFENDANT, BY REGULAR AND CERTIFIED MAIL TO 173 VARSITY ROAD, MASONTOWN, PA 15461 AND RR 2, BOX 109, CLEARFIELD, PA 16830, PER COURT ORDER. CERTIFIED #70022410000372241722 AND #70022410000372241708. BOTH OF THE CERTIFIED LETTERS WERE RETURNED UNCLAIMED TO THE SHERIFF'S OFFICE. THE LETTERS SENT REGULAR MAIL WERE NOT RETURNED TO THE SHERIFF'S OFFICE.

NOW, DECEMBER 5, 2003 A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANTS. THE PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR \$20,000.00 + COSTS.

NOW, FEBRUARY 26, 2004 PAID COSTS FROM THE ADVANCE AND MADE A REFUND OF THE UNUSED ADVANCE TO THE PLAINTIFF'S ATTORNEY.

**FILED**

03:23 PM  
FEB 26 2004

William A. Shaw  
Prothonotary/Clerk of Courts



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

Sheriff Docket # 14632

CENDANT MORTGAGE CORPORATION

03-270-CD

VS.

ZIMMERMAN, MICHAEL J.

WRIT OF EXECUTION      REAL ESTATE

**SHERIFF RETURNS**

---

NOW, FEBRUARY 26, 2004 RETURN WRIT AS A SALE BEING HELD ON THE  
PROPERTY OF THE DEFENDANTS. THE PROPERTY WAS PURCHASED BY THE  
PLAINTIFF FOR \$20,000.00 + COSTS.

NOW, FEBRUARY 26, 2004 A DEED WAS FILED.

SHERIFF HAWKINS      \$627.44  
SURCHARGE      \$40.00  
PAID BY ATTORNEY

Sworn to Before Me This

*Will Shaw* Day Of *Feb* 2004  
*Will Shaw*  
WILLIAM A. SHAW  
Prothonotary  
My Commission Expires  
1st Monday in Jan. 2006  
Clearfield Co., Clearfield, PA

So Answers,

*Chester A. Hawkins*  
*Cynthia Butler-Aughenbaugh*  
Chester A. Hawkins  
Sheriff

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

CENDANT MORTGGE CORPORATION

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA

vs.

NO.: 2003-270-CD

MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

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: **RR2 BOX 109, CLEARFIELD, PA 16830**

(See legal description attached.)

Amount Due

\$67,252.54

Interest from 9/9/03 to  
Date of Sale (\$11.06 per diem)

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

Total

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

*William L. Harrison*  
Prothonotary, Common Pleas Court of  
Clearfield County, Pennsylvania

Dated September 9, 2003  
(SEAL)

By:

Deputy

SZB

*Received September 9, 2003 @ 2:10 P.M.  
Chester A. Hunskins  
By Cynthia Butler-Aughenbaugh*

No. 2003-270-CD

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

CENDANT MORTGGE CORPORATION

vs.

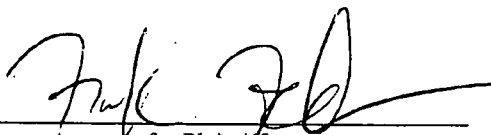
MICHAEL J. ZIMMERMAN  
BAMBI L. ZIMMERMAN

---

**WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

---

Real Debt	<u>\$67,252.54</u>
Int. from 9/9/03 to Date of Sale (\$11.06 per diem)	<u>                    </u>
Costs	<u>                    </u>
Prothy. Pd.	<u>139.00</u>
Sheriff	<u>                    </u>

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

Address: RR2 BOX 109, CLEARFIELD, PA 16830  
RR2 BOX 109, CLEARFIELD, PA 16830  
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

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PARCEL 2 -

BEGINNING at a point on a private road, said point being the Southwest corner of the parcel of land previously conveyed by John K. Bunkey to Melvin Daisher by a deed dated September 28, 1945, and recorded in Deed Book 373 at Page 204; thence Northerly along the line of said previous conveyance one hundred eighty-six and one-half ( $186 \frac{1}{2}$ ) feet to a point; thence Westerly fifty (50) feet to a point; thence Southerly one hundred eighty-six and one-half ( $186 \frac{1}{2}$ ) feet to a point on a private road; thence Easterly along said private road fifty (50) feet to the place of beginning.

PARCEL 3 -

BEGINNING at an iron pipe, said pipe being the Northern corner of land herein described and also being in the Southern line of Lawrence Township, Route T-903; thence by land now or formerly of Samuel B. Yost and Jody F. Yost, also land now or formerly of Bonnie Haberl, South forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds West, three hundred twenty-seven and fifty-seven one-hundredths (327.57) feet to an iron bolt in the Northern line of an unimproved road; thence by the Northern line of said unimproved road, North twenty-eight (28) degrees twenty-five (25) minutes zero (00) seconds West, fifty and no hundredths (50.00) feet to an iron pipe; thence by land now or formerly of Ronald Bressler and Joyce Bressler, North forty-eight (48) degrees twenty-five (25) minutes fifty-five (55) seconds East, three hundred three and ninety-one one-hundredths (303.91) feet to an iron pipe in the Southern line of the beforementioned T-903, South fifty-five (55) degrees forty-two minutes twenty-one (21) seconds East, fifty and twenty-two one-hundredths (50.22) feet to an iron pipe and place of beginning. Containing 0.35 acres.

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Tax Parcel# 123-K6-657-9

TITLE TO SAID PREMISES IS VESTED IN Michael J. Zimmerman and Bambi L. Zimmerman, husband and wife by Deed from Dale W. Wanner and Charlinda A. Wanner, husband and wife dated 6/29/2000 and recorded 7/7/2000 in Instrument# 200009566.

# REAL ESTATE SALE SCHEDULE OF DISTRIBUTION

NAME ZIMMERMAN NO. 03-270-CD

NOW, December 5, 2003, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on the 5TH day of DECEMBER 2003, I exposed the within described real estate of MICHAEL J. ZIMMERMAN AND BAMBI L. ZIMMERMAN to public venue or outcry at which time and place I sold the same to CENDANT MORTGAGE CORPORATION he/she being the highest bidder, for the sum of \$20,000.00 + COSTS and made the following appropriations, viz:

## SHERIFF COSTS:

RDR	15.00
SERVICE	15.00
MILEAGE	
LEVY	15.00
MILEAGE	2.00
POSTING	15.00
CSDS	10.00
COMMISSION 2%	400.00
POSTAGE	25.44
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	20,000.00
RETURNS/DEPUTIZE	
COPIES/BILLING	15.00
	5.00
BILLING/PHONE/FAX	10.00
<b>TOTAL SHERIFF COSTS</b>	<b>627.44</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	67,252.54
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	40.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
<b>TOTAL DEBT &amp; INTEREST</b>	<b>67,292.54</b>

## COSTS:

ADVERTISING	698.04
TAXES - collector	NONE
TAXES - tax claim	NONE
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	30.50
SHERIFF COSTS	627.44
LEGAL JOURNAL AD	225.00
PROTHONOTARY	139.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	

<b>TOTAL COSTS</b>	<b>1,864.98</b>
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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

FEDERMAN AND PHELAN  
BY: Francis S. Hallinan, Esq.  
Atty. I.D. # 62695  
1617 John F. Kennedy Boulevard Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CENDANT MORTGAGE  
CORPORATION

COURT OF COMMON PLEAS

vs.

CIVIL DIVISION

MICHAEL J. ZIMMERMAN  
BABMI L. ZIMMERMAN

CLEARFIELD COUNTY

NO. 2003-270-CD

**ORDER**

AND NOW, this 1st day of August, 2003, upon consideration of Plaintiff's Motion for Service Pursuant to Special Order of Court and the Affidavit of Reasonable Investigation attached thereto, it is hereby **ORDERED** that Plaintiff may obtain service of the Complaint on the above captioned Defendant(s) **MICHAEL J. ZIMMERMAN AND BABMI L. ZIMMERMAN**, by mailing a true and correct copy of the Complaint by certified mail and regular mail to the Defendant's last known address, and to the mortgaged premises located at **RR2 BOX 109, CLEARFIELD, PA 16830**.

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 as to the mailing.

BY THE COURT:

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

/s/ JOHN K. REILLY, JR.

J.

AUG 01 2003

Attest.

William L. Shaw  
Prothonotary/  
Clerk of Courts

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:  
Bambi L. Zimmerman  
173 Varsity Road  
Masontown, PA 15461

2. Article Number

(Transfer from service label)

7002 2410 0003 7224 1715

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

☐ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes



**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

Bambi L. Zimmerman  
R. R. #2, Box 109  
Clearfield, PA 16830

2. Article Number

(Transfer from service label)

7002 2410 0003 7224 1692

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X Bambi Zimmerman

☐ Agent

☒ Addressee

B. Received by (Printed Name)

Bambi Zimmerman

C. Date of Delivery

11-18-03

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

PO Box 32  
Lanser, PA 16849

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

U.S. Postal Service™

**CERTIFIED MAIL™ RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage \$ 6.00

Certified Fee

Return Receipt Fee  
(Endorsement Required)

Restricted Delivery Fee  
(Endorsement Required)

Total Postage & Fees \$ 4.65

Sent To

Bambi L. Zimmerman

Street, Apt. No.,  
or PO Box No. 173 Varsity Road

City, State, ZIP+4  
Masontown, PA 15461

PS Form 3800, June 2002

U.S. Postal Service™

**CERTIFIED MAIL™ RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage \$ 6.00

Certified Fee

Return Receipt Fee  
(Endorsement Required)

Restricted Delivery Fee  
(Endorsement Required)

Total Postage & Fees \$ 4.65

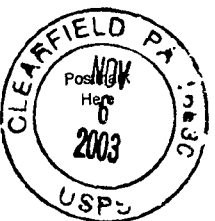
Sent To

Bambi L. Zimmerman

Street, Apt. No.,  
or PO Box No. R. R. #2, Box 109

City, State, ZIP+4  
Clearfield, PA 16830

PS Form 3800, June 2002

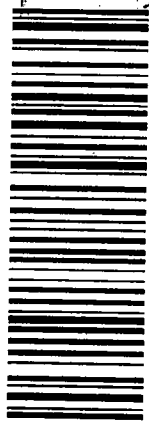


See Reverse for Instructions

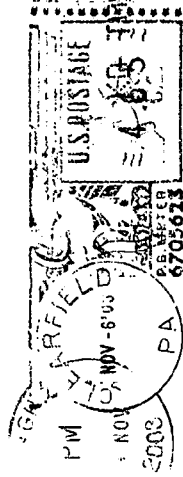




CHESTER A. HAWKINS  
SHERIFF  
COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830



7002 2410 0003 7224 1715



11-10A

BAMBI L. ZIMMERMAN  
173 VARSITY ROAD  
MASONTOWN, PA 15461

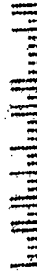


- ☐ INSUFFICIENT ADDRESS
- ☐ ATTEMPTED NOT KNOWN
- ☐ NO SUCH NUMBER/ STREET
- ☐ NOT DELIVERABLE AS ADDRESSED
- ☐ UNABLE TO FORWARD
- ☐ OTHER

**RTS**  
RETURN TO SENDER

Received  
12-1-03

13461+2303



## SENDER: COMPLETE THIS SECTION

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

## 1. Article Addressed to:

Michael J. Zimmerman  
R. R. #2, Box 109  
Clearfield, PA 16830

## 2. Article Number

(Transfer from service label)

7002 2410 0003 7224 1708

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X

☐ Agent☐ Addressee

## B. Received by (Printed Name)

## C. Date of Delivery

## D. Is delivery address different from item 1?

☐ Yes

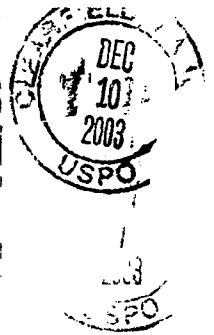
If YES, enter delivery address below:

☐ No

## 3. Service Type

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

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

## SENDER: COMPLETE THIS SECTION

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

## 1. Article Addressed to:

Michael J. Zimmerman  
173 Varsity Road  
Masontown, PA 15461

## 2. Article Number

(Transfer from service label)

7002 2410 0003 7224 1722

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1540

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X

☐ Agent☐ Addressee

## B. Received by (Printed Name)

## C. Date of Delivery

## D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

## 3. Service Type

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

## 4. Restricted Delivery? (Extra Fee)

☐ Yes

U.S. Postal Service™

## CERTIFIED MAIL™ RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee  
(Endorsement Required)Restricted Delivery Fee  
(Endorsement Required)

Total Postage &amp; Fees \$

Sent To

Michael J. Zimmerman

Street, Apt. No.,  
or PO Box No.

173 Varsity Road

City, State, ZIP+4

Masontown, PA 15461

PS Form 3800, June 2002

See Reverse for Instructions

U.S. Postal Service™

## CERTIFIED MAIL™ RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

OFFICIAL USE

Postage \$

Certified Fee

Return Receipt Fee  
(Endorsement Required)Restricted Delivery Fee  
(Endorsement Required)

Total Postage &amp; Fees \$

Sent To

Michael J. Zimmerman

Street, Apt. No.,  
or PO Box No.

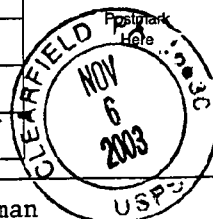
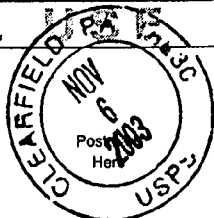
R. R. #2, Box 109

City, State, ZIP+4

Clearfield, PA 16830

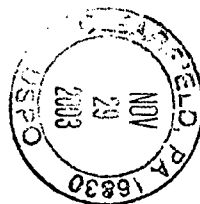
PS Form 3800, June 2002

See Reverse for Instructions



7002 2410 0003 7224 1722

7002 2410 0003 7224 1708



Received 12-1-03

15461+2503

MICHAEL J. ZIMMERMAN  
173 VARSITY ROAD  
MASONTOWN, PA 15461

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

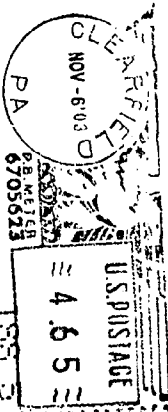
**RTS**  
RETURN TO SENDER



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



7002 2410 0003 7224 1708



11-19

MICHAEL J. ZIMMERMAN

173 VARSITY RD

MA ☐ C

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

**RTS**  
RETURN TO SENDER

16830/2424

Received 12-1-03

11-19  
11-24  
12-24

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

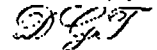
ATTENTION: CINDY (814) 765-5915

Re: CENDANT MORTGGE CORPORATION v. MICHAEL J. ZIMMERMAN BAMBI  
L.ZIMMERMAN  
No. 2003-270-CD  
RR2 BOX 109, CLEARFIELD, PA 16830

Dear Cindy:

This letter will confirm that we are proceeding with the December 5, 2003 sheriff sale. Service of notice of sale is complete as of October 23, 2003 per court order.

Very truly yours,



Dan G. Trautz

VIA TELECOPY (814) 765-5915