

03-693-CD
CITICORP TRUST BANK vs. RONALD R. HARRIS, et al.

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb, f/k/a Citifinancial Services, Inc.	COURT OF COMMON PLEAS CIVIL DIVISION
7467 New Ridge road Hanover, MD 21076	Clearfield County
Plaintiff	
v.	
Ronald R. Harris Jessica E. Harris a/k/a Jesica E. Harris P.O. Box 52 Irvona, PA 16656	NO. 03-693-CD
Defendant(s)	

COMPLAINT IN MORTGAGE FORECLOSURE

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.

LAWYERS REFERRAL SERVICE
David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext.5982

FILED

MAY 08 2003

William A. Shaw
Prothonotary

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentear una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

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

**David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext.5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**LAW OFFICES OF MARK J. UDREN
/s/ Mark J. Udren, Esquire
1040 N. Kings Highway, Suite 500
Cherry Hill, NJ 08034
(856) 482-6900**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: **N/A**

Assignments of Record to: **N/A**

Recording Date: **N/A**

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 313 Berwind Street

MUNICIPALITY/TOWNSHIP/BOROUGH: Irvona Borough

COUNTY: Clearfield

DATE EXECUTED: 5/24/02

DATE RECORDED: 5/29/02 INSTR NO: 200208477

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

(a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated

below;

(b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 5/7/03:

Principal of debt due	\$52,819.19
Unpaid Interest at 12.50% from 9/01/02 to 5/7/03 (the per diem interest accruing on this debt is \$17.36 and that sum should be added each day after 5/7/03)	4,423.52
Title Report	250.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$0.00 should be added in accordance with the terms of the note each month after 5/7/03)	0.00
Title Appraisal Fees	225.00
Prior Interest	2,621.80
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,640.96</u>
TOTAL	\$63,260.47

7. The attorney's fee 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 in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time

limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$63,260.47 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



Mark J. Udren, ESQUIRE
MARK J. UDREN & ASSOCIATES
Attorney for Plaintiff
Attorney I.D. No. 04302

ALL THAT CERTAIN PROPERTY LOCATED IN IRVONA BOROUGH, CLEARFIELD COUNTY, PENNSYLVANIA, TOGETHER WITH THE IMPROVEMENTS ERECTED THEREON, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POST ON THE NORTHWEST CORNER OF BERWIND AND EMMA STREET; THENCE NORTHWESTERLY BY EMMA STREET ONE HUNDRED FIFTY (150) FEET TO AN ALLEY; THENCE BY SAID ALLEY FIFTY (50) FEET TO LOT NO. 211; THENCE BY SAME ONE HUNDRED FIFTY (150) FEET TO BERWIND STREET; THENCE BY SAME EASTERLY FIFTY (50) FEET TO A POST ON EMMA STREET AND PLACE OF BEGINNING. BEING REFERRED TO A LOT NO. 212.

BEING IDENTIFIED BY CLEARFIELD COUNTY ASSESSMENT MAP NUMBER 11-H16-353-121.

April 1, 2003

ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

EXHIBIT A

HOMEOWNER'S NAME(S):	Ronald R. Harris Jessica E. Harris
PROPERTY ADDRESS:	313 Berwind St. Irving PA 16656
LOAN ACCT. NO.:	20-0051-0252015
ORIGINAL LENDER:	Citifinancial Services, Inc.
CURRENT LENDER:	Citifinancial Services, Inc.

HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM

YOU MAY BE ELIGIBLE FOR FINANCIAL ASSISTANCE
WHICH CAN SAVE YOUR HOME FROM FORECLOSURE AND
HELP YOU MAKE FUTURE MORTGAGE PAYMENTS

**IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S
 EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE
 ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:**

- **IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,**
- **IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND**
- **IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.**

TEMPORARY STAY OF FORECLOSURE – Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the consumer credit counseling agencies listed at the end of this Notice. **THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT", EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.**

CONSUMER CREDIT COUNSELING AGENCIES – If you meet with one of the consumer credit counseling agencies listed at the end of this notice, the lender may NOT take action against you for thirty (30) days after the date of this meeting. **The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice.** It is only necessary to schedule one face-to-face meeting. Advise your lender immediately of your intentions.

APPLICATION FOR MORTGAGE ASSISTANCE – Your mortgage is in default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application **MUST** be filed or postmarked within thirty (30) days of your

face- to-face meeting.

YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.

AGENCY ACTION -- Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT.

(If you have filed bankruptcy you can still apply for Emergency Mortgage Assistance.)

HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).

NATURE OF THE DEFAULT -- The MORTGAGE debt held by the above lender on your property located at:

**313 Berwind St.
Irving PA 16656**

IS SERIOUSLY IN DEFAULT because:

A. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following months and the following amounts are now past due:

Monthly Payments of \$576.47 for September 1, 2002 through April 1, 2002	= \$4611.76
Monthly Late Charges of \$0.00 for September 1, 2002 through March 1, 2003	= \$0.00
Other charges (explain/itemize):	Title/Appraisal Fees = \$225.00
TOTAL AMOUNT PAST DUE:	\$4836.76

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable): **N/A**

HOW TO CURE THE DEFAULT -- You may cure the default within THIRTY (30) DAYS of the date of this notice BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS **\$4836.76**, PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:

**Mark J. Udren & Associates
1040 N. Kings Highway, Suite 500
Cherry Hill, NJ 08034**

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.): **N/A**

IF YOU DO NOT CURE THE DEFAULT -- If you do not cure the default within THIRTY (30) DAYS of the date of this Notice, the lender intends to exercise its rights to accelerate the mortgage debt. This

means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within THIRTY (30) DAYS, the lender also intends to instruct its attorneys to start legal action to foreclose upon your mortgaged property.

IF THE MORTGAGE IS FORECLOSED UPON -- The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

OTHER LENDER REMEDIES -- The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage. If your debt has been discharged in bankruptcy without your having reaffirmed it, then lender cannot pursue this remedy.

RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE -- If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the total amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. Curing your default in the manner set forth in this notice will restore your mortgage to the same position as if you had never defaulted.

EARLIEST POSSIBLE SHERIFF'S SALE DATE -- It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be approximately 6 months from the date of this Notice. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

HOW TO CONTACT THE LENDER:

Name of Lender/Servicer:	<u>Citicorp Trust Bank, fsb</u>
Address:	<u>7467 New Ridge Rd.</u>
	<u>Suite 222</u>
	<u>Hanover MD 21076</u>
Phone Number:	<u>(800) 446-7876</u>
Fax Number:	<u>(410) 689-1610</u>
Contact Person:	<u>Jana Gantt</u>

EFFECT OF SHERIFF'S SALE -- You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishings and other belongings could be started by the lender at any time.

ASSUMPTION OF MORTGAGE -- You may not transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**LAW OFFICES OF MARK J. UDREN
/s/ Mark J. Udren, Esquire
1040 N. Kings Highway, Suite 500
Cherry Hill, NJ 08034
(856) 482-6900**

YOU MAY ALSO HAVE THE RIGHT:

- TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS,
- TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY

CLEARFIELD COUNTY

Keystone Economic Development Corporation
1954 Mary Grace Lane
Johnstown, PA 15901
(814) 535-6556
FAX (814) 539-1688

CCCS of Western Pennsylvania, Inc.
217 E. Plank Road
Altoona PA 16602
(814) 944-8100
FAX (814) 944-5747

CCCS of Western PA
219-A College Park Plaza
Johnstown PA 15904
(814) 539-6335
FAX n/a

Indiana Co. Community Action Program
827 Water Street, Box 187
Indiana, PA 15701
(724) 465-2657
FAX (412) 465-5118

CCCS of Northeastern PA
1631 S Atherton St., Suite 100
State College, PA 16801
(814) 238-3668
FAX (814) 238-3669

LAW OFFICES
MARK J. UDREN & ASSOCIATES
1040 N. KINGS HIGHWAY
SUITE 500
CHERRY HILL, NJ 08034



7002 2410 0005 4387 7187
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OFFICIAL USE

Postage	\$.60
Certified Fee	\$ 2.36
Return Receipt Fee (Endorsement Required)	\$ 1.75
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.65

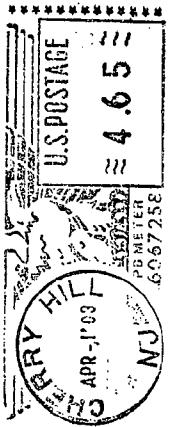
Postmark
Here

Street, Apt. No.,
or PO Box No.
City, State, ZIP+4

Ronald R. Harris
313 Berwind St.
Irving PA 16656

PS Form 3800, June 2002

See Reverse for Instructions



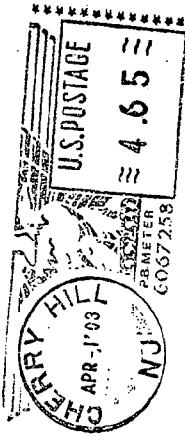
U.S. POSTAGE
4.65

CHERRY HILL
APR 11 '03
NJ
POSTMASTER
6067258

0308514 31

LAW OFFICES
MARK J. UDREN & ASSOCIATES
1040 N. KINGS HIGHWAY
SUITE 500
CHERRY HILL, NJ 08034

CERTIFIED MAIL™



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7002 2410 0005 4387 7170

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	

Postage	\$.60
Certified Fee	2.30
Return Receipt Fee (Endorsement Required)	1.75
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.65

Postmark
Here

Sent To	Jessica E. Harris
Street, Apt No; or PO Box No.	313 Berwind St.
City, State, ZIP+4	Irving PA 16656

PS Form 3800, June 2002

See Reverse for Instructions

03600514 75

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

- 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:

JESSICA E. Harris

313 Berwind St.

Truma PA 16656

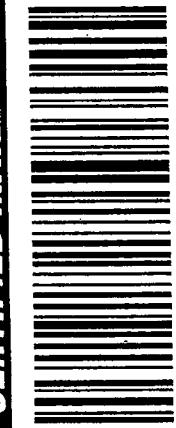
A. Signature X		<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
B. Received by (Printed Name)		C. Date of Delivery
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No		

3. Service Type
<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes

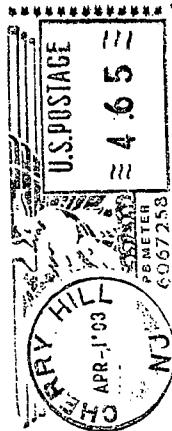
2. Article Number (Transfer from service label)	7002 2410 0005 4387 7170
PS Form 3811, August 2001 Domestic Return Receipt 2ACPR1-03-2-0885	

■ Certified Mail
■ Importer's Record
■ A mailing record
■ A unique item
■ A record of delivery
■ Certified Mail
■ Certified Return Receipt
■ NO INSURANCE
■ Valuables, please
■ Delivery to addressee
■ Delivery to addressee, please
■ For an additional fee
■ Addressee's address
■ Endorsement "F"
■ CLE at the post office
■ Postmark or
■ Address label
■ For an additional
■ Address label
■ If a postmark is not needed
■ If a postmark or
■ Endorsement "F"
■ Internet access
■ Addressed to AP
■ Internet access
■ Addressed to AP

CERTIFIED MAIL™



MARK J. UDREN & ASSOCIATES
1040 N. KINGS HIGHWAY
SUITE 500
CHERRY HILL, NJ 08034



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For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$.60
Certified Fee	2.30
Return Receipt Fee (Endorsement Required)	1.75
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.65

Postmark
Here

Sent To Ronald R. Harris
Street, Apt. No.; P.O. Box 52
or PO Box No.
City, State, ZIP+4 Irving PA 16656

PS Form 3800, June 2002 See Reverse for Instructions

30805M 15

LAW OFFICES
MARK J. UDREN & ASSOCIATES
1040 N. KINGS HIGHWAY
SUITE 500
CHERRY HILL, NJ 08034

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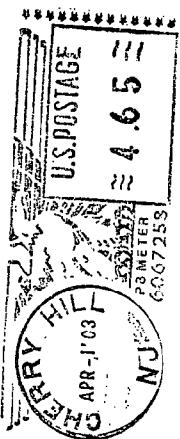
OFFICIAL USE

Postage	\$.60
Certified Fee	2.30
Return Receipt Fee (Endorsement Required)	1.75
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.65

Postmark
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Sent To
Jessica E. Harris
Street, Apt. No.;
or PO Box No.
P.O. Box 52
City, State, ZIP+4
Irving PA 16656

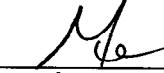
PS Form 3800, June 2002
See Reverse for Instructions



03080514 11

V E R I F I C A T I O N

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation unless designated otherwise; that he is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.



Mark J. Udren, ESQUIRE
MARK J. UDREN & ASSOCIATES

FILED

Att. fee. \$5.00

3111-21754 2cc. ~~cc~~ Shss
MAY 08 2003

William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

CITICORP TRUST BANK

VS.

HARRIS, RONALD R. & JESSICA E. a/k/a JESICA E.

COMPLAINT IN MORTGAGE FORECLOSURE

Sheriff Docket # 14039

03-693-CD

SHERIFF RETURNS

NOW MAY 14, 2003 AT 11:01 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON JESSICA E. HARRIS A/K/A JESICA E. HARRIS, DEFENDANT AT RESIDENCE, 313 BERWIND ST., IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JESSICA HARRIS A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: MORGILLO

NOW MAY 14, 2003 AT 11:01 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON RONALD R. HARRIS, DEFENDANT AT RESIDENCE, 313 BERWIND ST., IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JESSICA HARRIS, WIFE, A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: MORGILLO

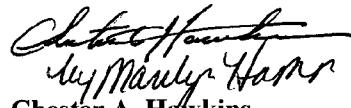
Return Costs

Cost	Description
43.44	SHERIFF HAWKINS PAID BY: ATTY CK# 6771
20.00	SURCHARGE PAID BY: ATTY CK# 6772

Sworn to Before Me This

2nd Day Of June 2003
William A. Shaw

So Answers,


Chester A. Hawkins
Sheriff

FILED

⁰²
JUN 06 2003 ¹⁰²
013:35 p.m.

William A. Shaw
Prothonotary

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

Plaintiff

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Irvona, PA 16656

NO. 03-693-CD

Defendant(s)

FILED

JUN 1 9 2003

M 11:56 AM
William A. Shaw *wa*
Prothonotary

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

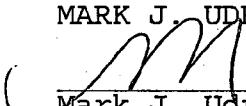
TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against the 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	\$63,260.47
Interest Per Complaint	711.76
From 05/08/03 to 06/17/03	
 TOTAL	 \$63,972.23

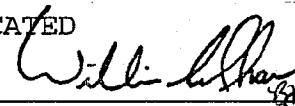
I hereby certify that (1) the addresses of the Plaintiff and Defendant are as shown above, and (2) that notice has been given in accordance with Rule 237.1, a copy of which is attached hereto.

MARK J. UDREN & ASSOCIATES


Mark J. Udren, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: 6/19/03


PRO PROTHY

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb, f/k/a
Citifinancial Services, Inc.
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
Defendant(s)

NO. 03-693-CD

DATED: June 6, 2003
TO: Ronald R. Harris
313 Berwind Street
Irsvona, PA 16656

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 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.

LAWYER REFERRAL SERVICE
David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext.5982

NOTIFICACION IMPORTANTE

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUIRIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO IMMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASSISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL
LAWYER REFERRAL SERVICE
David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext.5982

NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb, f/k/a
Citifinancial Services, Inc.
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
Defendant(s)

NO. 03-693-CD

DATED: June 6, 2003
TO: Jessica E. Harris
a/k/a Jesica E. Harris
313 Berwind Street
Irvington, PA 16656

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 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.

LAWYER REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982

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SERVICIO DE REFERENCIA LEGAL
LAWYER REFERRAL SERVICE
David S. Meholick
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Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982

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MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

NO. 03-693-CD

v.
Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Irsvona, PA 16656

Defendant(s)

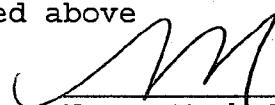
AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF New Jersey :
COUNTY OF Camden : SS

THE UNDERSIGNED being duly sworn, deposes and says that the averments herein are based upon investigations made and records maintained by us either as Plaintiff or as servicing agent of the Plaintiff herein and that the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended, and that the age and last known residence and employment of each Defendant are as follows:

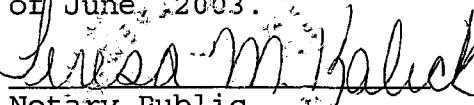
Defendant: Ronald R. Harris
Age: Over 18
Residence: As captioned above
Employment: Unknown

Defendant: Jessica E. Harris a/k/a Jesica E. Harris
Age: Over 18
Residence: As captioned above
Employment: Unknown



Name: Mark J. Udren, Esquire
Title: Attorney for Plaintiff
Company: Mark J. Udren & Associates

Sworn to and subscribed
before me this 17th day
of June, 2003.


Notary Public

TERESA M. KALICK
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 4/10/2009

FILED

Atty and doceo

JUN 11 2003

Notice & Copy of process to

each less.

William A. Shaw Statement to Atty
Prothonotary

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

COPY

Plaintiff

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Irsvona, PA 16656

NO. 03-693-CD

Defendant(s)

TO: Ronald R. Harris
313 Berwind Street
Irsvona, PA 16656

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Prothonotary

- Judgment by Default
- Money Judgment
- Judgment in Replevin
- Judgment for Possession
- Judgment on Award of Arbitration
- Judgment on Verdict
- Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-482-6900.

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

COPY

Plaintiff

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Iriona, PA 16656

NO. 03-693-CD

Defendant(s)

TO: Jessica E. Harris a/k/a Jesica E. Harris
313 Berwind Street
Iriona, PA 16656

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Prothonotary

- Judgment by Default
- Money Judgment
- Judgment in Replevin
- Judgment for Possession
- Judgment on Award of Arbitration
- Judgment on Verdict
- Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-482-6900

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

Citicorp Trust Bank, FSB
f/k/a Citifinancial Services, Inc.
Plaintiff(s)

COPY

No.: 2003-00693-CD

Real Debt: \$63,972.23

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Ronald R. Harris and
Jessica E. Harris a/k/a
Jesica E. Harris
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: June 19, 2003

Expires: June 19, 2008

Certified from the record this 19th day of June, 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

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

Plaintiff

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Irvington, PA 16656

NO. 03-693-CD

Defendant(s)

PRAECIPE FOR WRIT OF EXECUTION

TO THE SHERIFF:

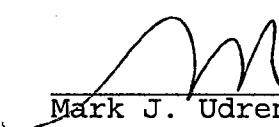
Issue Writ of Execution in the above matter:

Amount due \$63,972.23

Interest From June 18, 2003
to Date of Sale
Per diem @\$17.36

(Costs to be added) \$ _____
Prothonotary Costs 125.00

MARK J. UDREN & ASSOCIATES



Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

FILED

JUN 19 2003

William A. Shaw
Prothonotary

FILED

Atty pd.
m/11/55 2000
JUN 19 2003 1 CC & 6 Writs
to Sheriff
William A. Shaw Property descr.
Prothonotary Q
KJW

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

Plaintiff

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Irvington, PA 16656

NO. 03-693-CD

Defendant(s)

C E R T I F I C A T E

Mark J. Udren, 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 insured mortgage
- Non-owner occupied
- Vacant
- Act 91 procedures have been fulfilled.
- Over 24 months delinquent..

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

MARK J. UDREN & ASSOCIATES



Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

Plaintiff

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Irvona, PA 16656

NO. 03-693-CD

Defendant(s)

AFFIDAVIT PURSUANT TO RULE 3129.1

Citicorp Trust Bank, fsb, f/k/a Citifinancial Services, Inc., Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praeclipe for the Writ of Execution was filed the following information concerning the real property located at: 313 Berwind Street, Irvona, PA 16656

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

Name _____ Address _____

Ronald R. Harris 313 Berwind Street, Irvinia, PA 16656

Jessica E. Harris 313 Berwind Street, Irvona, PA 16656
a/k/a Jesica E. Harris

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

Name _____ Address _____

Same as No. 1 above

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

Name _____ Address _____

NONE

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

Plaintiff herein.

See Caption above.

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

Name _____ Address _____

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 _____ Address _____

Real Estate Tax Department 1 N. Second St., Ste. 116, Clearfield, PA 16830

Domestic Relations Section 1 N. Second St., Ste. 116, 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 _____ Address _____

Tenants/Occupants 313 Berwind Street, Irvona, PA 16656

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.

MARK J. UDREN & ASSOCIATES

DATED: June 17, 2003

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076

Plaintiff

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Irsvona, PA 16656

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 03-693-CD

FILED

SEP 24 2003

William A. Shad

Prothonotary/Clerk of Court

No Court

AFFIDAVIT OF SERVICE PURSUANT TO Pa.R.C.P.RULE 3129.1

Plaintiff, by its/his/her Attorney, Mark J. Udren, Esquire, hereby verifies that:

1. A copy of the Notice of Sheriff's Sale, a true and correct copy of which is attached hereto as Exhibit "A", was sent to every recorded lienholder and every other interested party known as of the date of the filing of the Praeclipe for the Writ of Execution, on the date(s) appearing on the attached Certificates of Mailing.
2. A Notice of Sheriff's Sale was sent to Defendant(s) by regular mail and certified mail on the date appearing on the attached Return Receipt, which was signed for by Defendant(s) on the date specified on the said Return Receipt. Copies of the said Notice and Return Receipt are attached hereto as Exhibit "B".
3. If a Return Receipt is not attached hereto, then service was by personal service on the date specified on the attached Return of Service, attached hereto as Exhibit "B".
4. If service was by Order of Court, then proof of compliance with said Order is attached hereto as Exhibit "B".

All Notices were served within the time limits set forth by Pa Rule C.P. 3129.

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

Dated: September 15, 2003

MARK J. UDREN & ASSOCIATES

BY:

Mark J. Udren, Esquire
Attorney for Plaintiff

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076

Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 03-693-CD

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Irsvona, PA 16656

Defendant(s)

DATE: August 14, 2003

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

NOTICE OF SHERIFF'S SALE
OF REAL PROPERTY

OWNER(S): Ronald R. Harris and Jessica E. Harris a/k/a Jesica E. Harris

PROPERTY: 313 Berwind Street
Irsvona, PA 16656

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on October 10, 2003, at 10:00AM, in the Clearfield County Courthouse, 1 North Second Street, Suite 116, Clearfield, PA 16830. Our records indicate that you may hold a mortgage or judgment on the property which will be extinguished by the sale. You may wish to attend the sale to protect your interests.

A Schedule of Distribution will be filed by the Sheriff 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.

EXHIBIT A

Name and Address Of Sender		Law Offices Mark J. Udren & Assoc. 1040 N. Kings Highway, Suite 500 Cherry Hill, NJ 08034		Check appropriate block for Return Receipt for Merchandise Int'l Recorded Del. With Postal Insurance Without postal insurance		Affix stamp here if issued as certificate of mailing or for additional copies of this bill.							
Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge (if Regis.)	Act. Value (if Regis.)	Insured Value	Due Sender If COD	R.R. Fee	S.D. Fee	Rst. Del. Fee	Remarks	
1	Harris	Real Estate Tax Dep't., 1 N. Second St., Ste. 116 Clearfield, PA 16830											
2	03020514	Domestic Relations Section, 1 N. Second St., Ste. 116 Clearfield, PA 16830											
3	Clearfield	Commonwealth of PA, Dept. of Revenue, Bureau of Compliance, Dept. 280946, Harrisburg, PA 17128-0946											
4	Jodie	Tenants/Occupants, 313 Berwind St., Irvinona, PA 16656											
5													
6													
7													
8													
9													
10													
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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 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail sent with optional postal insurance. See Domestic Mail Manual R800, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to first and tenth class pieces.								Postmark and Date of Receipt		

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

Plaintiff

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Iriona, PA 16656

NO. 03-693-CD

COPY

Defendant(s)

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

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

313 Berwind Street
Iriona, PA 16656
SEE LEGAL DESCRIPTION ATTACHED

Amount due

\$63,972.23

Interest From June 18, 2003
to Date of Sale
Per diem @\$17.36

(Costs to be added)

\$ _____

Prothonotary- \$125.00

By Willie L. Harris Clerk

Date 10/19/03

COURT OF COMMON PLEAS
NO. 03-693-CD

=====

Citicorp Trust Bank, fsb, f/k/a
Citifinancial Services, Inc.
vs.
Ronald R. Harris
Jessica E. Harris a/k/a Jesica E. Harris

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 63,972.23

INTEREST \$
from June 18, 2003 to
Date of Sale
Per diem @\$17.36

COSTS PAID:
PROTHY \$ 125.00

SHERIFF \$

STATUTORY \$

COSTS DUE PROTHY. \$

PREMISES TO BE SOLD:

313 Berwind Street

Irvona, PA 16656

Mark J. Udren, ESQUIRE
MARK J. UDREN & ASSOCIATES
1040 NORTH KINGS HIGHWAY
SUITE 500
CHERRY HILL, NJ 08034
(856) 482-6900

ALL THAT CERTAIN PROPERTY LOCATED IN IRVONA BOROUGH, CLEARFIELD COUNTY, PENNSYLVANIA, TOGETHER WITH THE IMPROVEMENTS ERECTED THEREON, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POST ON THE NORTHWEST CORNER OF BERWIND AND EMMA STREET; THENCE NORTHWESTERLY BY EMMA STREET ONE HUNDRED FIFTY (150) FEET TO AN ALLEY; THENCE BY SAID ALLEY FIFTY (50) FEET TO LOT NO. 211; THENCE BY SAME ONE HUNDRED FIFTY (150) FEET TO BERWIND STREET; THENCE BY SAME EASTERLY FIFTY (50) FEET TO A POST ON EMMA STREET AND PLACE OF BEGINNING. BEING REFERRED TO A LOT NO. 212.

BEING IDENTIFIED BY CLEARFIELD COUNTY ASSESSMENT MAP NUMBER 11-H16-353-121.

BEING KNOWN AS 313 BERWIND STREET, IRVONA, PA 16656

PROPERTY ID NO.: 11-H16-353-00121

TITLE TO SAID PREMISES IS VESTED IN RONALD R. HARRIS AND JESSICA E. HARRIS, HIS WIFE, BY DEED FROM GAYNALE B. PEACOCK NOW KNOWN AS GAYNALE B. DAVIS AND WILLIAM DAVIS, SR., HER HUSBAND, DATED 04/13/98, RECORDED 04/17/98, IN DEED BOOK 1924, PAGE 429.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 14398

CITICORP TRUST BANK, FSB, F/K/A CITIFINANCIAL SERVICES INC. 03-693-CD

VS.

HARRIS, RONALD R.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

NOW, AUGUST 22, 2003 @ 10:15 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 OCTOBER 10, 2003 WAS SET.

NOW, AUGUST 22, 2003 @ 10:15 A.M. SERVED JESSICA E. HARRIS, DEFENDANT AT HER RESIDENCE 313 BERWIND STREET, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JESSICA E. HARRIS, DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF THE LEVY AND BY MAKING KNOWN TO HER THE CONTENTS THEREOF.

NOW, AUGUST 22, 2003 @ 10:15 A.M. SERVED RONALD R. HARRIS, DEFENDANT, AT HIS RESIDENCE 313 BERWIND STREET, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO JESSICA E. HARRIS, WIFE/DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF THE LEVY AND BY MAKING KNOWN TO HER THE CONTENTS THEREOF.

NOW, OCTOBER 10, 2003 A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANTS. THE PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR \$1.00 + COSTS.

NOW, DECEMBER 9, 2003 PAID THE COSTS FROM THE ADVANCE AND MADE A REFUND OF THE UNUSED ADVANCE TO THE ATTORNEY.

FILED

DEC 15 2003

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 14398

CITICORP TRUST BANK, FSB, F/K/A CITIFINANCIAL SERVICES INC.

03-693-CD

VS.

HARRIS, RONALD R.

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURNS

**NOW, DECEMBER 15, 2003 RETURN WRIT AS A SALE WAS HELD ON THE PROPERTY
OF THE DEFENDANTS. THE PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR
\$1.00 + COSTS.**

NOW, DECEMBER 15, 2003 THE DEED WAS FILED.

SHERIFF HAWKINS \$239.32

SURCHARGE \$40.00

PAID BY ATTORNEY

Sworn to Before Me This

19th Day Of Dec 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
By Cynthia Ritter-Augustine

Chester A. Hawkins

Sheriff

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, fsb,
f/k/a Citifinancial Services,
Inc.
7467 New Ridge road
Hanover, MD 21076

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

Plaintiff

v.

Ronald R. Harris
Jessica E. Harris
a/k/a Jesica E. Harris
P.O. Box 52
Irvona, PA 16656

NO. 03-693-CD

Defendant(s)

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

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

313 Berwind Street
Irvona, PA 16656
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$63,972.23

Interest From June 18, 2003
to Date of Sale
Per diem @\$17.36

(Costs to be added) \$ _____

Received 6/20/03 @ 3:00 P.M.

Chester A. Hawkins

By *Cynthia Butler Augherbaugh*

Prothonotary \$125.00

Clerk

Date 6/19/03

COURT OF COMMON PLEAS
NO. 03-693-CD

=====

Citicorp Trust Bank, fsb, f/k/a
Citifinancial Services, Inc.
vs.
Ronald R. Harris
Jessica E. Harris a/k/a Jesica E. Harris

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 63,972.23

INTEREST \$
from June 18, 2003 to
Date of Sale
Per diem @\$17.36

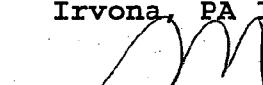
COSTS PAID:
PROTHY \$ 125.00

SHERIFF \$

STATUTORY \$

COSTS DUE PROTHY. \$

PREMISES TO BE SOLD:
313 Berwind Street
Irvington, PA 16656


Mark J. Udren, ESQUIRE
MARK J. UDREN & ASSOCIATES
1040 NORTH KINGS HIGHWAY
SUITE 500
CHERRY HILL, NJ 08034
(856) 482-6900

ALL THAT CERTAIN PROPERTY LOCATED IN IRVONA BOROUGH, CLEARFIELD COUNTY, PENNSYLVANIA, TOGETHER WITH THE IMPROVEMENTS ERECTED THEREON, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POST ON THE NORTHWEST CORNER OF BERWIND AND EMMA STREET; THENCE NORTHWESTERLY BY EMMA STREET ONE HUNDRED FIFTY (150) FEET TO AN ALLEY; THENCE BY SAID ALLEY FIFTY (50) FEET TO LOT NO. 211; THENCE BY SAME ONE HUNDRED FIFTY (150) FEET TO BERWIND STREET; THENCE BY SAME EASTERLY FIFTY (50) FEET TO A POST ON EMMA STREET AND PLACE OF BEGINNING. BEING REFERRED TO A LOT NO. 212.

BEING IDENTIFIED BY CLEARFIELD COUNTY ASSESSMENT MAP NUMBER 11-H16-353-121.

BEING KNOWN AS 313 BERWIND STREET, IRVONA, PA 16656

PROPERTY ID NO.: 11-H16-353-00121

TITLE TO SAID PREMISES IS VESTED IN RONALD R. HARRIS AND JESSICA E. HARRIS, HIS WIFE, BY DEED FROM GAYNALE B. PEACOCK NOW KNOWN AS GAYNALE B. DAVIS AND WILLIAM DAVIS, SR., HER HUSBAND, DATED 04/13/98, RECORDED 04/17/98, IN DEED BOOK 1924, PAGE 429.

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME HARRIS NO. 03-693-CD

NOW, October 10, 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 10TH day of OCTOBER 2003, I exposed the within described real estate of RONALD R. HARRIS AND JESSICA E. HARRIS A/K/A JESICA E. HARRIS to public venue or outcry at which time and place I sold the same to CITICORP TRUST BANK, FSB, F/K/A CITIFINANCIAL SERVICES, 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	19.44
LEVY	15.00
MILEAGE	19.44
POSTING	15.00
CSDS	10.00
COMMISSION 2%	
POSTAGE	4.44
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	1.00
RETURNS/DEPUTIZE	
COPIES/BILLING	15.00
	5.00
BILLING/PHONE/FAX	5.00
TOTAL SHERIFF COSTS	239.32
DEED COSTS:	
ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	29.50
TRANSFER TAX 2%	
TOTAL DEED COSTS	29.50

PLAINTIFF COSTS, DEBT & INTEREST:

DEBT-AMOUNT DUE	63,972.23	
INTEREST		
TO BE ADDED		
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		
TOTAL DEBT & INTEREST	63,972.23	
COSTS:		
ADVERTISING	305.55	
TAXES - collector	04-Jan	1,088.92
TAXES - tax claim	paid	
DUE		
LIEN SEARCH	100.00	
ACKNOWLEDGEMENT	5.00	
DEED COSTS	29.50	
SHERIFF COSTS	239.32	
LEGAL JOURNAL AD	162.00	
PROTHONOTARY	125.00	
MORTGAGE SEARCH	40.00	
MUNICIPAL LIEN	34.68	
TOTAL COSTS	2,129.97	

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