

03-870-CD

FEDERAL NATIONAL MORTGAGE, et al vs. DAVID E. WILLIAMS, et al

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION, assignee of  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of MELLON BANK,  
N.A., Successor Trustee, assignee of  
CORESTATES BANK, N.A., Trustee for  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of TOWNE &  
COUNTRY MORTGAGE CORP.,

CIVIL DIVISION

NO. 03-870-CD

**COMPLAINT IN MORTGAGE  
FORECLOSURE**

Code  
MORTGAGE FORECLOSURE

Plaintiff,

Filed on behalf of  
Plaintiff

vs.

DAVID E. WILLIAMS and GERALDINE  
L. WILLIAMS, husband and wife,

Counsel of record for this  
party:

Louis P. Vitti, Esquire  
PA I.D. #3810  
Supreme Court #01072

Defendants.

Louis P. Vitti & Assoc., P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219

(412) 281-1725

**FILED**

JUN 13 2003

William A. Shaw  
Prothonotary

**COMPLAINT IN MORTGAGE FORECLOSURE**

**NOTICE**

**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 THE ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES AND 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 SHOULD 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.**

**PROTHONOTARY  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830**

**(814) 765-2641 - EXT. 20**

COMPLAINT IN MORTGAGE FORECLOSURE

AND NOW, comes the Plaintiff by its attorneys, Louis P. Vitti and Associates, P.C. and Louis P. Vitti, Esquire, and pursuant to the Pennsylvania Rules of Civil Procedure Numbers 1141 through 1150, for its Complaint in Mortgage Foreclosure, sets forth the following:

1. The Plaintiff is a corporation duly authorized to conduct business within the laws of the Commonwealth of Pennsylvania, having a principal place of business located at 3900 Wisconsin Avenue, N.W., Washington, DC 20016-2899.
2. The Defendant(s) is/are individuals with a last known mailing address of RD 1, Box 268B, Frenchville, PA 16836. The property address is **P.O. Box 28, Le Contes Mills, PA 16850** and is the subject of this action.
3. On the 31st day of July, 1995, in consideration of a loan of Forty Thousand, Five Hundred and No/100 (\$40,500.00) Dollars made by Towne & Country Mortgage Corp., a PA corporation, to Defendant(s), the said Defendant(s) executed and delivered to Towne & Country Mortgage Corp., a PA corporation, a "Note" secured by a Mortgage with the Defendant(s) as mortgagor(s) and Towne & Country Mortgage Corp., as mortgagee, which mortgage was recorded on the 7th day of August, 1995, in the Office of the Recorder of Deeds of Clearfield County, in Mortgage Book Volume 1694, page 242. The said mortgage is incorporated herein by reference thereto as though the same were set forth fully at length.
4. The premises secured by the mortgage are:

(See Exhibit "A" attached hereto.)

5. On the 31st day of July, 1995, Towne & Country Mortgage Corp., a PA corporation, assigned to the Plaintiff, CoreStates Bank, N.A., Trustee for Pennsylvania Housing Finance Agency, the said mortgage, that assignment being recorded in the Office of the Recorder of Deeds of Clearfield County on the 7th day of August, 1995, in Mortgage Book Volume 1694, page 251. The said assignment is incorporated herein by reference.

6. On or before the 25th day of November, 1996, CoreStates Bank, N.A., Trustee for Pennsylvania Housing Finance Agency, a PA corporation, assigned to the Plaintiff, Mellon Bank, N.A., Successor Trustee, the said mortgage, that assignment being recorded in the Office of the Recorder of Deeds of Clearfield County on the 25th day of November, 1996, in Mortgage Book Volume 1805, page 211. The said assignment is incorporated herein by reference.

7. On or before the 2nd day of September, 1998, Mellon Bank, N.A., Successor Trustee, a PA corporation, assigned to the Plaintiff, Pennsylvania Housing Finance Agency, the said mortgage, that assignment being recorded in the Office of the Recorder of Deeds of Clearfield County on the 2nd day of September, 1998, in Mortgage Book Volume 1965, page 157. The said assignment is incorporated herein by reference.

8. On the 30th day of May, 2003, Pennsylvania Housing Finance Agency, a PA corporation, assigned to the Plaintiff, Federal National Mortgage Association, the said mortgage, that assignment being recorded in the Office of the Recorder of Deeds of Clearfield County and the said assignment is incorporated herein by reference.

9. Said mortgage provides, inter alia:

"that when as soon as the principal debt secured shall become due and payable, or in case default shall be made in the payment of any installment of principal and interest, or any monthly payment, keeping and performance by the mortgagor of any of the terms, conditions or covenants of the mortgage or note, it shall be lawful for mortgagee to bring an Action of Mortgage Foreclosure, or other proceedings upon the mortgage, of principal debt, interest and all other recoverable sums, together with attorney's fees."

10. Since February 1, 2003, the mortgage has been in default by reason, inter alia, of the failure of the mortgagor(s) to make payments provided for in the said mortgage (including principal and interest) and, under the terms of the mortgage, the entire principal sum is due and payable.

11. In accordance with the appropriate Pennsylvania Acts of Assembly and the Pennsylvania Rules of Civil Procedure, the mortgagor(s) has been advised in writing of the mortgagees intention to foreclose. The appropriate time period has elapsed since the Notice of Intention to Foreclose has been served upon the mortgagor(s).

12. The amount due on said mortgage is itemized on the attached schedule.

13. Plaintiff does hereby release the personal representative, heir and/or devisee of the mortgagor(s) from liability for the debt secured by the mortgage.

WHEREFORE, pursuant to Pennsylvania Rule of Civil Procedure Number 1147(6), Plaintiff demands judgment for the amount due of Forty-Three Thousand, Twelve and 29/100 Dollars (\$43,012.29) with interest and costs.

Respectfully submitted,

LOUIS P. VITTI & ASSOC., P.C.

BY 

Louis P. Vitti, Esquire  
Attorney for Plaintiff

Williams, David E.

**SCHEDULE OF AMOUNTS DUE UNDER MORTGAGE**

Unpaid Principal Balance		36,935.02	
Interest @ 7.5000%	from 01/01/03	through 6/30/2003	1,366.09
(Plus \$7.5894 per day after 6/30/2003 )			
Late charges through 6/11/2003			
0 months @ 11.33			
Accumulated beforehand			103.73
(Plus \$11.33 on the 17th day of each month after 6/11/2003 )			
Attorney's fee		1,846.75	
Escrow deficit		<u>2,760.70</u>	

(This figure includes projected additional charges that may be incurred by the Plaintiff and transmitted to the sheriff as charges on the writ prior to the date of the sheriff's sale)

**BALANCE DUE** **43,012.29**

ADDENDUM ATTACHED TO AND MADE A PART OF THAT CERTAIN MORTGAGE FROM DAVID E. WILLIAMS AND GERALDINE L. WILLIAMS, HUSBAND AND WIFE TO TOWNE & COUNTRY MORTGAGE CORP. DATED JULY 31, 1995 AND COVERING PROPERTY KNOWN AS P.O. BOX 28, LE CONTES MILLS, PA 16850.

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ALL that certain parcel of land situate in the Village of Bald Hill in the Township of Girard, County of Clearfield and State of Pennsylvania, bounded and described as follows:

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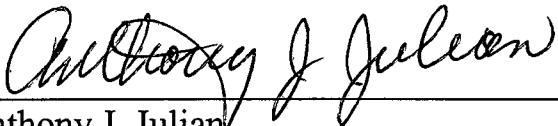
CONTAINING .821 of an acre.

BEING the same property which James E. Luzier and Dorothy Luzier, husband and wife, by deed dated July 31, 1995 and to be recorded herewith, granted and conveyed to David E. Williams and Geraldine L. Williams, husband and wife, the Mortgagors herein.

A  
EXHIBIT" \_\_\_\_\_ "

## VERIFICATION

Anthony J. Julian hereby states that he is the Director of Accounting and Loan Servicing Program of the Pennsylvania Housing Finance Agency, 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.



\_\_\_\_\_  
Anthony J. Julian  
Director of Accounting & Loan Servicing

Date: June 11, 2003

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

9-30-03 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.  
Colleen  
Deputy Prothonotary

**FILED** Aug 11 2003  
M 11:30 AM  
JUN 13 2003 85.00  
200 Shs  
William A. Shaw  
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

FEDERAL NATIONAL MORTGAGE ASSOCIATION

vs.

WILLIAMS, DAVID E. & GERALDINE L.

COMPLAINT IN MORTGAGE FORECLOSURE

Sheriff Docket # 14198

03-870-CD

**SHERIFF RETURNS**

NOW JULY 24, 2003 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, DEFENDANTS, MOVED TO NEW JERSEY, ADDRESS UNKNOWN.

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**Return Costs**

Cost	Description
35.89	SHERIFF HAWKINS PAID BY: ATTY CK# 16467
20.00	SURCHARGE PAID BY: ATTY CK# 16659

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Sworn to Before Me This

25<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*  
by *Marilyn Harris*  
Chester A. Hawkins  
Sheriff

**FILED**  
0 3-47-03  
JUL 25 2003 *KPK*

William A. Shaw  
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PA I.D. #3810  
Supreme Court #01072

Defendants.

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916 Fifth Avenue  
Pittsburgh, PA 15219

(412) 281-1725

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

JUN 13 2003

Attest.

*William A. Ross*  
Prothonotary/  
Clerk of Courts

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BY *Louis P. Vitti*

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Attorney for Plaintiff

Williams, David E.

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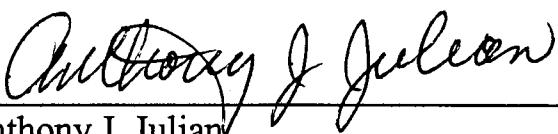
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Date: June 11, 2003

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**BALANCE DUE** 43,012.29

ADDENDUM ATTACHED TO AND MADE A PART OF THAT CERTAIN MORTGAGE FROM DAVID E. WILLIAMS AND GERALDINE L. WILLIAMS, HUSBAND AND WIFE TO TOWNE & COUNTRY MORTGAGE CORP. DATED JULY 31, 1995 AND COVERING PROPERTY KNOWN AS P.O. BOX 28, LE CONTES MILLS, PA 16850.

\*\*\*\*\*

ALL that certain parcel of land situate in the Village of Bald Hill in the Township of Girard, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING at a stake in the line of land of Harry T. Smith; thence N.  $83^{\circ} 31'$  W. 136.3 feet to a stake; thence still by land of Harry T. Smith N.  $5^{\circ} 25'$  E. 252.5 feet to a stake in the line of land of the Isaac Smith Estate; thence by land of the Isaac Smith Estate S.  $82^{\circ} 45'$  E. 146.1 feet to an iron spike; thence by land conveyed to Bernard Rolley S.  $4^{\circ} 59'$  W. 145.8 feet to an iron spike; thence by land of Harry T. Smith S.  $11^{\circ} 44'$  W. 105.6 feet to a stake and the place of beginning.

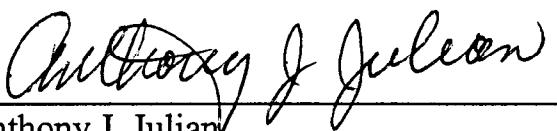
CONTAINING .821 of an acre.

BEING the same property which James E. Luzier and Dorothy Luzier, husband and wife, by deed dated July 31, 1995 and to be recorded herewith, granted and conveyed to David E. Williams and Geraldine L. Williams, husband and wife, the Mortgagors herein.

A  
EXHIBIT" A "

## VERIFICATION

Anthony J. Julian hereby states that he is the Director of Accounting and Loan Servicing Program of the Pennsylvania Housing Finance Agency, 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.

  
\_\_\_\_\_  
Anthony J. Julian  
Director of Accounting & Loan Servicing

Date: June 11, 2003

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION, assignee of  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of MELLON BANK,  
N.A., Successor Trustee, assignee of  
CORESTATES BANK, N.A., Trustee for  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of TOWNE &  
COUNTRY MORTGAGE CORP.,

CIVIL DIVISION

NO. 03-870-CD

**PRAECIPE TO REINSTATE  
COMPLAINT IN MORTGAGE  
FORECLOSURE**

Code - MORTGAGE FORECLOSURE

Plaintiff,

Filed on behalf of  
Plaintiff

vs.

DAVID E. WILLIAMS and GERALDINE  
L. WILLIAMS, husband and wife,

Counsel of record for this  
party:

Louis P. Vitti, Esquire  
PA I.D. #3810  
Supreme Court #01072

Louis P. Vitti & Assoc., P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219

(412) 281-1725

**FILED**

JUL 30 2003

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, ) NO. 03-870-CD  
assignee of PENNSYLVANIA HOUSING FINANCE )  
AGENCY, assignee of MELLON BANK, N.A., )  
Successor Trustee, assignee of CORESTATES )  
BANK, N.A., Trustee for PENNSYLVANIA HOUSING )  
FINANCE AGENCY, assignee of TOWNE & )  
COUNTRY MORTGAGE CORP., )  
Plaintiff, )  
vs. )  
DAVID E. WILLIAMS and GERALDINE L. )  
WILLIAMS, husband and wife, )  
Defendants. )

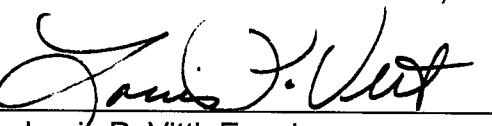
PRAECIPE TO REINSTATE COMPLAINT

TO: PROTHONOTARY OF CLEARFIELD COUNTY:

KINDLY reinstate the Complaint in the above-captioned matter.

Respectfully submitted,

LOUIS P. VITTI AND ASSOCIATES, P.C.

BY:   
Louis P. Vitti, Esquire  
Attorney for Plaintiff

DATE: July 28, 2003

**FILED**

in 11-09-04 pd 7-50  
JUL 30 2003  
2 remanded to shb.  
complaint to shb.

William A. Shaw  
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

FEDERAL NATIONAL MORTGAGE ASSOCIATION

VS.

WILLIAMS, DAVID E. & GERALDINE L.

Sheriff Docket #

14198

03-870-CD

COMPLAINT IN MORTGAGE FORECLOSURE

**SHERIFF RETURNS**

NOW AUGUST 1, 2003 MAILED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE TO DAVID E. WILLIAMS, DEFENDANT BY CERT. MAIL # 7002 2410 0003 7224 1470 AT 187 WILLETS AVE., LITTLE EGG HARBOR, NJ 08087 BEING HIS LAST KNOWN ADDRESS. THE RETURN RECEIPT IS HERETO ATTACHE AND MADE A PART OF THIS RETURN SIGNED BY DEFENDANT. THE LETTER WAS SENT MARKED "ADDRESSEE ONLY". NO DATE OF DELIVERY ON RETURN RECEIPT CARD.

NOW AUGUST 1, 2003 MAILED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE TO GERALDINE L. WILLIAMS, DEFENDANT BY CERT. MAIL # 7002 2410 0003 7224 1487 AT 187 WILLETS AVE., LITTLE EGG HARBOR, NJ 08087 BEING HER LAST KNOWN ADDRESS. THE LETTER WAS SENT MARKED "ADDRESSEE ONLY". THE LETTER IS HERETO ATTACHED AND MADE A PART OF THIS RETURN MARKED "UNCLAIMED".

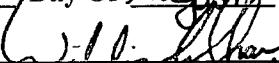
---

**Return Costs**

<b>Cost</b>	<b>Description</b>
30.30	SHERIFF HAWKINS PAID BY: ATTY CK# 17182
20.00	SURCHARGE PAID BY: ATTY CK# 17183

---

Sworn to Before Me This

26<sup>th</sup> Day Of August, 2003  


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

So Answers,

  
Chester A. Hawkins  
Sheriff

FILED  
03-870-CD E1  
AUG 26 2003 B2L

William A. Shaw  
Prothonotary/Clerk of Courts

**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:

DAVID E. WILLIAMS  
187 Willets Ave.  
Little Egg Harbor, NJ 08087

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature



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  COD

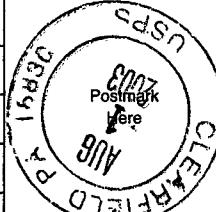
## 4. Restricted Delivery? (Extra Fee)

Yes

## 2. Article Number

(Transfer from service label)

11 11 7002 2410 0003 7224 1470

<b>CERTIFIED MAIL™ RECEIPT</b> <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information, visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	\$ <u>60</u>
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ <u>8.15</u>
<b>ADDRESSEE ONLY</b>	
	

*8/14/81*

**Certified Mail Provides:**

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

102595-02-M-1692  
PS Form 3800, June 2002 (Reverse)

**Important Reminders:**

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT: Save this receipt and present it when making an inquiry.  
Internet access to delivery information is not available on mail  
addressed to APOs and FPOs.**



CHESTER A. HAWKINS

SHERIFF

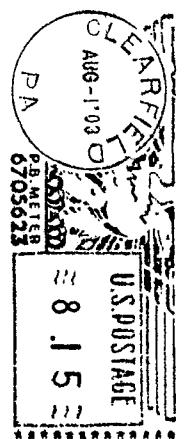
COURTHOUSE  
1 NORTH SECOND STREET, SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830

AUG  
25  
2003  
6030

7002 2410 0003 7224 1487

PLACE STICKER ATOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS FOLD AT DOTTED LINE

**CERTIFIED MAIL**



GERALDINE L. WILLIAMS  
187 Willets Ave.  
Little Egg Harbor, NJ 08087

ADDRESSEE  
ONLY  
AL

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



**UNCLAIMED**

080820032432

**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:**

GERALDINE L. WILLIAMS  
187 Willets Ave.  
Little Egg Harbor, NJ 08087

**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**2. Article Number***(Transfer from service label)***7002 2410 0003 7224 1487**

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-1035

7224 1487  
0003 7224 1487  
2410 0002 7002  
2410 0002 7002

CERTIFIED MAIL <sup>TM</sup> RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
<input type="checkbox"/> For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	160
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 8.15
<i>Sent To</i> GERALDINE L. WILLIAMS	
Street, Apt. No.; 187 Willets Ave.	
or PO Box No.	
City, State, ZIP+4 Little Egg Harbor, NJ 08087	

See Reverse for Instructions

PS Form 3800, June 2002

ALLG 16830 2002 Postmark Here

2002 CERTIFIED MAIL

ALLG 16830 2002 Postmark Here

**Certified Mail Provides:**

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

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**IMPORTANT:** Save this receipt and present it when making an inquiry. Internet access to delivery information is not available on mail addressed to APOs and FPOs.

102595-02-M-4592  
PS Form 3800, June 2002 (Reverse)

14191

7-30-03 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Deputy Prothonotary -

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION, assignee of  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of MELLON BANK,  
N.A., Successor Trustee, assignee of  
CORESTATES BANK, N.A., Trustee for  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of TOWNE &  
COUNTRY MORTGAGE CORP.,

CIVIL DIVISION

NO. 03-870-CD

COMPLAINT IN MORTGAGE  
FORECLOSURE

Code  
MORTGAGE FORECLOSURE

Plaintiff,

Filed on behalf of  
Plaintiff

vs.

Counsel of record for this  
party:

DAVID E. WILLIAMS and GERALDINE  
L. WILLIAMS, husband and wife,

Louis P. Vitti, Esquire  
PA I.D. #3810  
Supreme Court #01072

Defendants.

Louis P. Vitti & Assoc., P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219

(412) 281-1725

FILED  
13 2003  
William A. Shaw  
Prothonotary

**COMPLAINT IN MORTGAGE FORECLOSURE**

**NOTICE**

**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 THE ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES AND 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 SHOULD 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.**

**PROTHONOTARY  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830**

**(814) 765-2641 - EXT. 20**

COMPLAINT IN MORTGAGE FORECLOSURE

AND NOW, comes the Plaintiff by its attorneys, Louis P. Vitti and Associates, P.C. and Louis P. Vitti, Esquire, and pursuant to the Pennsylvania Rules of Civil Procedure Numbers 1141 through 1150, for its Complaint in Mortgage Foreclosure, sets forth the following:

1. The Plaintiff is a corporation duly authorized to conduct business within the laws of the Commonwealth of Pennsylvania, having a principal place of business located at 3900 Wisconsin Avenue, N.W., Washington, DC 20016-2899.
2. The Defendant(s) is/are individuals with a last known mailing address of RD 1, Box 268B, Frenchville, PA 16836. The property address is **P.O. Box 28, Le Contes Mills, PA 16850** and is the subject of this action.
3. On the 31st day of July, 1995, in consideration of a loan of Forty Thousand, Five Hundred and No/100 (\$40,500.00) Dollars made by Towne & Country Mortgage Corp., a PA corporation, to Defendant(s), the said Defendant(s) executed and delivered to Towne & Country Mortgage Corp., a PA corporation, a "Note" secured by a Mortgage with the Defendant(s) as mortgagor(s) and Towne & Country Mortgage Corp., as mortgagee, which mortgage was recorded on the 7th day of August, 1995, in the Office of the Recorder of Deeds of Clearfield County, in Mortgage Book Volume 1694, page 242. The said mortgage is incorporated herein by reference thereto as though the same were set forth fully at length.
4. The premises secured by the mortgage are:

(See Exhibit "A" attached hereto.)

5. On the 31st day of July, 1995, Towne & Country Mortgage Corp., a PA corporation, assigned to the Plaintiff, CoreStates Bank, N.A., Trustee for Pennsylvania Housing Finance Agency, the said mortgage, that assignment being recorded in the Office of the Recorder of Deeds of Clearfield County on the 7th day of August, 1995, in Mortgage Book Volume 1694, page 251. The said assignment is incorporated herein by reference.

6. On or before the 25th day of November, 1996, CoreStates Bank, N.A., Trustee for Pennsylvania Housing Finance Agency, a PA corporation, assigned to the Plaintiff, Mellon Bank, N.A., Successor Trustee, the said mortgage, that assignment being recorded in the Office of the Recorder of Deeds of Clearfield County on the 25th day of November, 1996, in Mortgage Book Volume 1805, page 211. The said assignment is incorporated herein by reference.

7. On or before the 2nd day of September, 1998, Mellon Bank, N.A., Successor Trustee, a PA corporation, assigned to the Plaintiff, Pennsylvania Housing Finance Agency, the said mortgage, that assignment being recorded in the Office of the Recorder of Deeds of Clearfield County on the 2nd day of September, 1998, in Mortgage Book Volume 1965, page 157. The said assignment is incorporated herein by reference.

8. On the 30th day of May, 2003, Pennsylvania Housing Finance Agency, a PA corporation, assigned to the Plaintiff, Federal National Mortgage Association, the said mortgage, that assignment being recorded in the Office of the Recorder of Deeds of Clearfield County and the said assignment is incorporated herein by reference.

9. Said mortgage provides, inter alia:

"that when as soon as the principal debt secured shall become due and payable, or in case default shall be made in the payment of any installment of principal and interest, or any monthly payment, keeping and performance by the mortgagor of any of the terms, conditions or covenants of the mortgage or note, it shall be lawful for mortgagee to bring an Action of Mortgage Foreclosure, or other proceedings upon the mortgage, of principal debt, interest and all other recoverable sums, together with attorney's fees."

10. Since February 1, 2003, the mortgage has been in default by reason, inter alia, of the failure of the mortgagor(s) to make payments provided for in the said mortgage (including principal and interest) and, under the terms of the mortgage, the entire principal sum is due and payable.

11. In accordance with the appropriate Pennsylvania Acts of Assembly and the Pennsylvania Rules of Civil Procedure, the mortgagor(s) has been advised in writing of the mortgagees intention to foreclose. The appropriate time period has elapsed since the Notice of Intention to Foreclose has been served upon the mortgagor(s).

12. The amount due on said mortgage is itemized on the attached schedule.

13. Plaintiff does hereby release the personal representative, heir and/or devisee of the mortgagor(s) from liability for the debt secured by the mortgage.

WHEREFORE, pursuant to Pennsylvania Rule of Civil Procedure Number 1147(6), Plaintiff demands judgment for the amount due of Forty-Three Thousand, Twelve and 29/100 Dollars (\$43,012.29) with interest and costs.

Respectfully submitted,

LOUIS P. VITTI & ASSOC., P.C.

BY *Louis P. Vitti*  
Louis P. Vitti, Esquire  
Attorney for Plaintiff

Williams, David E.

**SCHEDULE OF AMOUNTS DUE UNDER MORTGAGE**

Unpaid Principal Balance		<u>36,935.02</u>			
Interest @ 7.5000%	from	01/01/03	through	6/30/2003	1,366.09
(Plus \$7.5894 per day after 6/30/2003 )					
Late charges through	6/11/2003				
0 months @	11.33				
Accumulated beforehand					103.73
(Plus \$11.33 on the 17th day of each month after	6/11/2003 )				
Attorney's fee		1,846.75			
Escrow deficit		<u>2,760.70</u>			

(This figure includes projected additional charges that may be incurred by the Plaintiff and transmitted to the sheriff as charges on the writ prior to the date of the sheriff's sale)

**BALANCE DUE** 43,012.29

ADDENDUM ATTACHED TO AND MADE A PART OF THAT CERTAIN MORTGAGE FROM DAVID E. WILLIAMS AND GERALDINE L. WILLIAMS, HUSBAND AND WIFE TO TOWNE & COUNTRY MORTGAGE CORP. DATED JULY 31, 1995 AND COVERING PROPERTY KNOWN AS P.O. BOX 28, LE CONTES MILLS, PA 16850.

\*\*\*\*\*  
ALL that certain parcel of land situate in the Village of Bald Hill in the Township of Girard, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING at a stake in the line of land of Harry T. Smith; thence N.  $83^{\circ} 31'$  W. 136.3 feet to a stake; thence still by land of Harry T. Smith N.  $5^{\circ} 25'$  E. 252.5 feet to a stake in the line of land of the Isaac Smith Estate; thence by land of the Isaac Smith Estate S.  $82^{\circ} 45'$  E. 146.1 feet to an iron spike; thence by land conveyed to Bernard Rolley S.  $4^{\circ} 59'$  W. 145.8 feet to an iron spike; thence by land of Harry T. Smith S.  $11^{\circ} 44'$  W. 105.6 feet to a stake and the place of beginning.

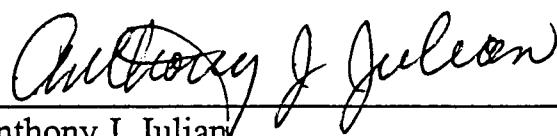
CONTAINING .821 of an acre.

BEING the same property which James E. Luzier and Dorothy Luzier, husband and wife, by deed dated July 31, 1995 and to be recorded herewith, granted and conveyed to David E. Williams and Geraldine L. Williams, husband and wife, the Mortgagors herein.

A  
EXHIBIT" A "

## VERIFICATION

Anthony J. Julian hereby states that he is the Director of Accounting and Loan Servicing Program of the Pennsylvania Housing Finance Agency, 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.

  
Anthony J. Julian  
Anthony J. Julian  
Director of Accounting & Loan Servicing

Date: June 11, 2003

CR

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION, assignee of  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of MELLON BANK,  
N.A., Successor Trustee, assignee of  
CORESTATES BANK, N.A., Trustee for  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of TOWNE &  
COUNTRY MORTGAGE CORP.,

Plaintiff,

vs.

DAVID E. WILLIAMS and GERALDINE  
L. WILLIAMS, husband and wife,

Defendants.

CIVIL DIVISION

NO. 03-870-CD

**MOTION FOR SPECIAL SERVICE**

Code - MORTGAGE FORECLOSURE

Filed on behalf of  
Plaintiff

Counsel of record for this  
party:

Louis P. Vitti, Esquire  
PA I.D. #3810  
Supreme Court #01072

Louis P. Vitti & Assoc., P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219  
412-281-1725

**FILED**

**SEP 25 2003**

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

NOTICE

TO: Geraldine L. Williams  
P.O. Box 28  
Le Contes Mills, PA 16850

Geraldine L. Williams  
187 Willets Avenue  
Little Egg Harbor, NJ 08087

Take notice that the within Motion for Special Service pursuant to Rule 430 of the Pennsylvania Rules of Civil Procedure will be presented before the Motions Judge, Clearfield County, Pennsylvania, as unopposed unless a responsive pleading is filed.

LOUIS P. VITTI & ASSOC., P.C.

BY:   
Louis P. Vitti, Esquire  
Attorney for Plaintiff

CERTIFICATION

I hereby certify that a true and correct copy of the within Motion was mailed to the Defendant at the above addresses on the 23rd day of September, 2003.

BY:   
Louis P. Vitti, Esquire  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, ) NO. 03-870-CD  
assignee of PENNSYLVANIA HOUSING FINANCE )  
AGENCY, assignee of MELLON BANK, N.A., )  
Successor Trustee, assignee of CORESTATES )  
BANK, N.A., Trustee for PENNSYLVANIA HOUSING )  
FINANCE AGENCY, assignee of TOWNE & )  
COUNTRY MORTGAGE CORP., )  
Plaintiff, )  
vs. )  
DAVID E. WILLIAMS and GERALDINE L. )  
WILLIAMS, husband and wife, )  
Defendants. )

**MOTION FOR SPECIAL SERVICE PURSUANT TO RULE 430  
AND THE PENNSYLVANIA RULES OF  
CIVIL PROCEDURE 400, ET SEQ.**

NOW comes the Plaintiff by and through their attorneys, Louis P. Vitti & Associates, P.C. and Louis P. Vitti, Esquire, and files this motion requesting this Honorable Court permit service pursuant to Pennsylvania Rules of Civil Procedure 400, et seq., and particularly Rule 430 whereof the following is a statement:

1. Plaintiff did file a Complaint at the above-captioned number in mortgage foreclosure.
2. The property address is P.O. Box 28, Le Contes Mills, PA 16850, and is the subject of this action.
3. The Sheriff did attempt to make service, but has been unable to serve the Defendant, GERALDINE L. WILLIAMS. See Exhibit "A".

4. A postal verification was ordered and the postal authority indicated that the Defendant's last known address was 187 Willets Drive, Little Egg Harbor, NJ 08087. See Exhibit "B".

5. Efforts to effectuate service by the Sheriff have met without success and service has been frustrated requiring presentation of this Motion.

WHEREFORE, Plaintiff prays this Honorable Court enter an Order permitting service by ordinary mail to Defendant's last known address and also by posting the property by the Sheriff.

Respectfully submitted,

LOUIS P. VITTI & ASSOC., P.C.

BY:   
Louis P. Vitti, Esquire  
Attorney for Plaintiff

In The Court of Common Pleas of Clearfield County, Pennsylvania

FEDERAL NATIONAL MORTGAGE ASSOCIATION

VS.

WILLIAMS, DAVID E. & GERALDINE L.

COMPLAINT IN MORTGAGE FORECLOSURE

Sheriff Docket # 14198

03-870-CB

COPY

**SHERIFF RETURNS**

NOW JULY 24, 2003 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, DEFENDANTS, MOVED TO NEW JERSEY, ADDRESS UNKNOWN.

---

**Return Costs**

Cost	Description
35.89	SHERIFF HAWKINS PAID BY: ATTY CK# 16467
20.00	SURCHARGE PAID BY: ATTY CK# 16659

---

Sworn to Before Me This

So Answers,

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

---



Chester A. Hawkins  
Sheriff

EXHIBIT

A-1

In The Court of Common Pleas of Clearfield County, Pennsylvania

FEDERAL NATIONAL MORTGAGE ASSOCIATION

VS.

WILLIAMS, DAVID E. & GERALDINE L.

COMPLAINT IN MORTGAGE FORECLOSURE

Sheriff Docket #

14198

03-870-CD

COPY

SHERIFF RETURNS

NOW AUGUST 1, 2003 MAILED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE TO DAVID E. WILLIAMS, DEFENDANT BY CERT. MAIL # 7002 2410 0003 7224 1470 AT 187 WILLETS AVE., LITTLE EGG HARBOR, NJ 08087 BEING HIS LAST KNOWN ADDRESS. THE RETURN RECEIPT IS HERETO ATTACHE AND MADE A PART OF THIS RETURN SIGNED BY DEFENDANT. THE LETTER WAS SENT MARKED "ADDRESSEE ONLY". NO DATE OF DELIVERY ON RETURN RECEIPT CARD.

NOW AUGUST 1, 2003 MAILED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE TO GERALDINE L. WILLIAMS, DEFENDANT BY CERT. MAIL # 7002 2410 0003 7224 1487 AT 187 WILLETS AVE., LITTLE EGG HARBOR, NJ 08087 BEING HER LAST KNOWN ADDRESS. THE LETTER WAS SENT MARKED "ADDRESSEE ONLY". THE LETTER IS HERETO ATTACHED AND MADE A PART OF THIS RETURN MARKED "UNCLAIMED".

Return Costs

Cost	Description
30.30	SHERIFF HAWKINS PAID BY: ATTY CK# 17182
20.00	SURCHARGE PAID BY: ATTY CK# 17183

Sworn to Before Me This

So Answers,

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



Chester A. Hawkins  
Sheriff

EXHIBIT

A-2



LOUIS P. VITTI & ASSOCIATES, P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219  
PHONE: (412) 281-1725 FAX: (412) 281-3810

DATE: August 27, 2003

POSTMASTER  
LECONTES MILLS, PA 16850

**Request for Change of Address or Boxholder  
Information Needed for Service of Legal Process**

Please furnish the new address or the name and street address (if a boxholder) for the following:

Name: Geraldine L. Williams  
Address: P.O. Box 28, Lecontes Mills, PA 16850

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

The following information is provided in accordance with 39 CFR 265.6(d)(6)(ii). There is no fee for providing boxholder information. The fee for providing change of address information is waived in accordance with 39 CFR 265.6(d)(1) and (2) and corresponding Administrative Support Manual 352.44a and b.

1. Capacity of requester (e.g., process server, attorney, party representing himself): Attorney
2. Statute or regulation that empowers me to serve process (not required when requester is an attorney or a party acting *pro se* - except a corporation acting *pro se* must cite statute): N/A
3. The names of all known parties to the litigation: Federal National Mortgage Association v. David E. Williams and Geraldine L. Williams
4. The court in which the case has been or will be heard: Court of Common Pleas of Clearfield County, PA
5. The docket or other identifying number if one has been issued: 03-870-CD
6. The capacity in which this individual is to be served (e.g. defendant or witness): Defendant

**WARNING**

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

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



Louis P. Vitti, Esquire  
916 Fifth Avenue  
Pittsburgh, PA 15219

**FOR POST OFFICE USE ONLY**

ADDRESS or BOXHOLDER'S POSTMARK

B-1 No change of address order on file. NEW

Not known at address given EXHIBIT NAME AND STREET ADDRESS

Moved, left no forwarding address.

No such address.

187 Willets DR  
Holmdel NJ 08087  
High Egg Harbor Twp

LOUIS P. VITTI & ASSOCIATES, P.C.

916 Fifth Avenue  
Pittsburgh, PA 15219  
PHONE: (412) 281-1725 FAX: (412) 281-3810

DATE: August 27, 2003

POSTMASTER  
LITTLE EGG HARBOR, NJ 08087

**Request for Change of Address or Boxholder  
Information Needed for Service of Legal Process**

Please furnish the new address or the name and street address (if a boxholder) for the following:

Name: Geraldine L. Williams  
Address: 187 Willets Avenue, Little Egg Harbor, NJ 08087

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

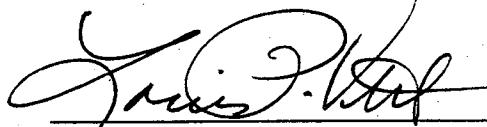
The following information is provided in accordance with 39 CFR 265.6(d)(6)(ii). There is no fee for providing boxholder information. The fee for providing change of address information is waived in accordance with 39 CFR 265.6(d)(1) and (2) and corresponding Administrative Support Manual 352.44a and b.

1. Capacity of requester (e.g., process server, attorney, party representing himself): Attorney
2. Statute or regulation that empowers me to serve process (not required when requester is an attorney or a party acting *pro se* - except a corporation acting *pro se* must cite statute): N/A
3. The names of all known parties to the litigation: Federal National Mortgage Association v. David E. Williams and Geraldine L. Williams
4. The court in which the case has been or will be heard: Court of Common Pleas of Clearfield County, PA
5. The docket or other identifying number if one has been issued: 03-870-CD
6. The capacity in which this individual is to be served (e.g. defendant or witness): Defendant

**WARNING**

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

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

  
Louis P. Vitti, Esquire  
916 Fifth Avenue  
Pittsburgh, PA 15219

**FOR POST OFFICE USE ONLY**

ADDRESS or BOXHOLDER'S POSTMARK  
**EXHIBIT**

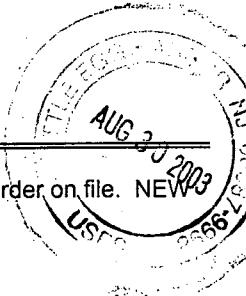
Not known at address given.

Moved, left no forwarding address.

No such address.

 No change of address order on file. NEW

NAME AND STREET ADDRESS



LOUIS P. VITTI & ASSOCIATES, P.C.

916 Fifth Avenue

Pittsburgh, PA 15219

PHONE: (412) 281-1725

FAX: (412) 281-3810

DATE: August 27, 2003

POSTMASTER  
FRENCHVILLE, PA 16836

**Request for Change of Address or Boxholder**

**Information Needed for Service of Legal Process**

Please furnish the new address or the name and street address (if a boxholder) for the following:

Name: Geraldine L. Williams  
Address: RD 1, Box 268B, Frenchville, PA 16836

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

The following information is provided in accordance with 39 CFR 265.6(d)(6)(ii). There is no fee for providing boxholder information. The fee for providing change of address information is waived in accordance with 39 CFR 265.6(d)(1) and (2) and corresponding Administrative Support Manual 352.44a and b.

1. Capacity of requester (e.g., process server, attorney, party representing himself): Attorney
2. Statute or regulation that empowers me to serve process (not required when requester is an attorney or a party acting *pro se* - except a corporation acting *pro se* must cite statute): N/A
3. The names of all known parties to the litigation: Federal National Mortgage Association v. David E. Williams and Geraldine L. Williams
4. The court in which the case has been or will be heard: Court of Common Pleas of Clearfield County, PA
5. The docket or other identifying number if one has been issued: 03-870-CD
6. The capacity in which this individual is to be served (e.g. defendant or witness): Defendant

**WARNING**

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

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



Louis P. Vitti, Esquire  
916 Fifth Avenue  
Pittsburgh, PA 15219

FOR POST OFFICE USE ONLY

ADDRESS or BOXHOLDER'S POSTMARK

No change of address order on file. NEW

Not known at address given. **EXHIBIT** *B-3* NAME AND STREET ADDRESS

Moved, left no forwarding address.

No such address.

*187 Willets DR  
Little Egg Harbor TWP,  
NJ 08087*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, ) NO. 03-870-CD  
assignee of PENNSYLVANIA HOUSING FINANCE )  
AGENCY, assignee of MELLON BANK, N.A., )  
Successor Trustee, assignee of CORESTATES )  
BANK, N.A., Trustee for PENNSYLVANIA HOUSING )  
FINANCE AGENCY, assignee of TOWNE & )  
COUNTRY MORTGAGE CORP., )  
Plaintiff, )  
vs. )  
DAVID E. WILLIAMS and GERALDINE L. )  
WILLIAMS, husband and wife, )  
Defendants. )

INVESTIGATION AFFIDAVIT PURSUANT TO P.A.R.C.P. NO. 430

Four Star Investigation sets forth the following:

1. Affiant and/or its agents have conducted an investigation to determine the whereabouts of the Defendant, GERALDINE L. WILLIAMS, by making inquiries of or examining the following:

a. Local telephone directory assistance has the following information:

No Listing

b. Local voter registration office shows the property address is:

No information for RELEASE

c. Department of Transportation - shows that the last known address for the Defendant is:

No Record

d. Other (please explain): CONFIRMED SUBJECT - GERALDINE L. WILLIAMS TO BE AT 187 WILLETS AVE, LITTLE EGG HARBOR, N.J. 08087. PHONE NUMBER - 609-296-7813.

2. Notwithstanding the investigation as set forth in this Affidavit, Affiant and/or its agents have not been able to locate the whereabouts of said Defendant as shown above and by the attached exhibits.

We verify that the statements made in this Affidavit are true and correct to the best of our knowledge, information and belief. We understand that false statements are made subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.

#### FOUR STAR INVESTIGATION

BY:

Ron J. Englehardt  
Investigator

Commonwealth of Pennsylvania :

: SS.

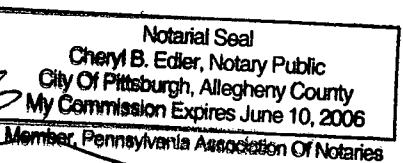
County of Allegheny :

:

On this the 22<sup>nd</sup> day of September, 2003, before me the undersigned officer, personally appeared the Affiant, known to me (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that he executed the same for the purposes therein contained.

In Witness Whereof, I hereunto set my hand and official seal.

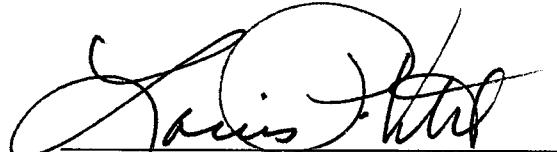
Cheryl B. Edler  
NOTARY PUBLIC



VERIFICATION

AND NOW Louis P. Vitti verifies that the statements made in this Motion are true and correct to the best of his knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. 4904, relating to unsworn falsification to authorities.

By virtue of the fact that the Plaintiff is outside the jurisdiction of the Court and the verification cannot be obtained within the time allowed for the filing of this pleading, the pleading is submitted by counsel having sufficient knowledge, information and belief based upon the information provided him by the Plaintiff.

  
Louis P. Vitti

Dated: September 23, 2003

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

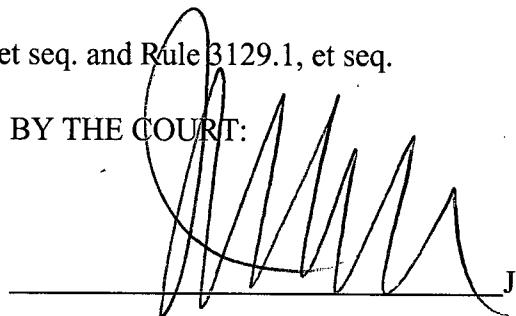
FEDERAL NATIONAL MORTGAGE ASSOCIATION, ) NO. 03-870-CD  
assignee of PENNSYLVANIA HOUSING FINANCE )  
AGENCY, assignee of MELLON BANK, N.A., )  
Successor Trustee, assignee of CORESTATES )  
BANK, N.A., Trustee for PENNSYLVANIA HOUSING )  
FINANCE AGENCY, assignee of TOWNE & )  
COUNTRY MORTGAGE CORP., )  
Plaintiff, )  
vs. )  
DAVID E. WILLIAMS and GERALDINE L. )  
WILLIAMS, husband and wife, )  
Defendants. )

ORDER OF COURT

NOW, this 26<sup>th</sup> day of September, 2003, it appearing to the Court  
that the Sheriff has been frustrated in service of process, it is Ordered, Adjudged and Decreed that  
service of the Complaint and all subsequent documents upon all Defendants be accomplished by  
ordinary mail to Defendant's last known address and by posting the property by the Sheriff in order  
to effect compliance with Rule 400, et seq. and Rule 3129.1, et seq.

BY THE COURT:

FILED

A handwritten signature consisting of a series of jagged, vertical lines forming a stylized 'J' shape, with a small 'J.' at the end.

SEP 26 2003

William A. Shaw  
Prothonotary

FILED  
OCT 6 2003  
0348 SEP 26 2003  
Clerk

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION, assignee of  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of MELLON BANK,  
N.A., Successor Trustee, assignee of  
CORESTATES BANK, N.A., Trustee for  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of TOWNE &  
COUNTRY MORTGAGE CORP.,

CIVIL DIVISION

NO. 03-870-CD

**PRAECIPE TO REINSTATE  
COMPLAINT IN MORTGAGE  
FORECLOSURE**

Code - MORTGAGE FORECLOSURE

Plaintiff,

Filed on behalf of  
Plaintiff

vs.

DAVID E. WILLIAMS and GERALDINE  
L. WILLIAMS, husband and wife,

Counsel of record for this  
party:

Defendants.

Louis P. Vitti, Esquire  
PA I.D. #3810  
Supreme Court #01072

Louis P. Vitti & Assoc., P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219

(412) 281-1725

**FILED**

SEP 30 2003 *ben*  
4/12:30/04  
William A. Shaw  
Prothonotary/Clerk of Courts *pp 7,00*  
*no c/c.*

REINSTATED *Constituent T*  
SHFF,

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, ) NO. 03-870-CD  
assignee of PENNSYLVANIA HOUSING FINANCE )  
AGENCY, assignee of MELLON BANK, N.A., )  
Successor Trustee, assignee of CORESTATES )  
BANK, N.A., Trustee for PENNSYLVANIA HOUSING )  
FINANCE AGENCY, assignee of TOWNE & )  
COUNTRY MORTGAGE CORP., )  
Plaintiff, )  
vs. )  
DAVID E. WILLIAMS and GERALDINE L. )  
WILLIAMS, husband and wife, )  
Defendants. )

**PRAECIPE TO REINSTATE COMPLAINT**

TO: PROTHONOTARY OF CLEARFIELD COUNTY:

KINDLY reinstate the Complaint in the above-captioned matter.

Respectfully submitted,

LOUIS P. VITTI AND ASSOCIATES, P.C.

BY: 

Louis P. Vitti, Esquire  
Attorney for Plaintiff

DATE: September 29, 2003

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

**FEDERAL NATIONAL MORTGAGE ASSOCIATION**

VS.

**WILLIAMS, DAVID E. & GERALDINE L.**

**Sheriff Docket #**

**14198**

**03-870-CD**

**COMPLAINT IN MORTGAGE FORECLOSURE**

**SHERIFF RETURNS**

---

NOW OCTOBER 3, 2003 AT 9:19 AM POSTED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON THE PROPERTY OF GERALDINE L. WILLIAMS, DEFENDANT AT P.O. BOX 28, LECONTES MILLS, (BALD HILL AREA) CLEARFIELD COUNTY, PENNSYLVANIA. SERVED BY: McCLEARY/NEVLING

---

**Return Costs**

<b>Cost</b>	<b>Description</b>
<b>18.36</b>	<b>SHERIFF HAWKINS PAID BY: ATTY CK# 18172</b>
<b>10.00</b>	<b>SURCHARGE PAID BY: ATTY.</b>

---

**Sworn to Before Me This**

13<sup>th</sup> Day Of October 2003  
Will A. Shaw

**So Answers,**

  
Chester A. Hawkins  
Sheriff

**FILED**

OCT 13 2003



William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION, assignee of  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of MELLON BANK,  
N.A., Successor Trustee, assignee of  
CORESTATES BANK, N.A., Trustee for  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of TOWNE &  
COUNTRY MORTGAGE CORP.,

CIVIL DIVISION

NO. 03-870-CD

**AFFIDAVIT OF SERVICE**

Code - MORTGAGE FORECLOSURE

Filed on behalf of  
Plaintiff

Counsel of record for this  
party:

Louis P. Vitti, Esquire  
PA I.D. #3810  
Supreme Court #01072

Louis P. Vitti & Assoc., P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219

(412) 281-1725

**FILED**

OCT 14 2003

h/12:40/ln  
William A. Shaw  
Prothonotary  
No. C-Font copies

*WES*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, ) NO. 03-870-CD  
assignee of PENNSYLVANIA HOUSING FINANCE )  
AGENCY, assignee of MELLON BANK, N.A., )  
Successor Trustee, assignee of CORESTATES )  
BANK, N.A., Trustee for PENNSYLVANIA HOUSING )  
FINANCE AGENCY, assignee of TOWNE & )  
COUNTRY MORTGAGE CORP., )  
Plaintiff, )  
vs. )  
DAVID E. WILLIAMS and GERALDINE L. )  
WILLIAMS, husband and wife, )  
Defendants. )

**AFFIDAVIT OF SERVICE**

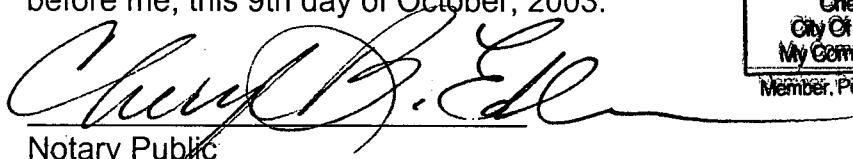
I, Louis P. Vitti, Esquire, do hereby certify that a copy of the Order of Court and Complaint was served upon GERALDINE L. WILLIAMS by ordinary mail to Defendant's last known address on the 9th day of October, 2003 as per the Order of Court dated the 26th day of September, 2003. The Certificates of Mailing are attached hereto as Exhibit "A".



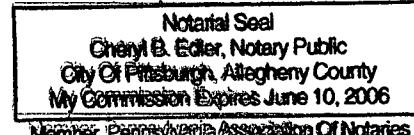
Louis P. Vitti, Esquire

Sworn to and subscribed

before me, this 9th day of October, 2003.



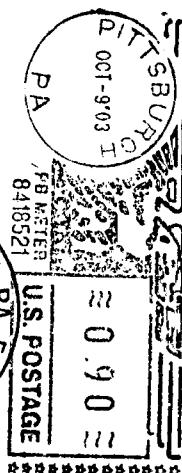
Cheryl B. Edler  
Notary Public



U.S. POSTAL SERVICE	CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMASTER	
Received From:	LOUIS P. VITTI & ASSOCIATE 916 FIFTH AVENUE PITTSBURGH, PA 15219 (412) 281-1725
One piece of ordinary mail addressed to: Geraldine L. Williams P.O. Box 28 Le Contes Mills, PA 16801	

PS Form 3817, January 2001

cbe



U.S. POSTAL SERVICE	CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMASTER	
Received From:	LOUIS P. VITTI & ASSOCIATES 916 FIFTH AVENUE PITTSBURGH, PA 15219 (412) 281-1725
One piece of ordinary mail addressed to: Geraldine L. Williams 187 Willets Avenue Little Egg Harbor, NJ 08083	

PS Form 3817, January 2001

cbe



A large, stylized letter 'A' is centered at the bottom of the page. Below it, the word 'EXHIBIT' is written in a bold, sans-serif font, followed by a small double quote mark.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION, assignee of  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of MELLON BANK,  
N.A., Successor Trustee, assignee of  
CORESTATES BANK, N.A., Trustee for  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of TOWNE &  
COUNTRY MORTGAGE CORP.,

CIVIL DIVISION

NO. 03-870-CD

**PRAECIPE FOR DEFAULT  
JUDGMENT, CERTIFICATION OF  
MAILING AND AFFIDAVIT OF NON-  
MILITARY SERVICE**

Code MORTGAGE FORECLOSURE

Plaintiff,

Filed on behalf of  
Plaintiff

vs.

DAVID E. WILLIAMS and GERALDINE  
L. WILLIAMS, husband and wife,

Defendants.

Counsel of record for this  
party:

Louis P. Vitti, Esquire  
PA I.D. #3810  
Supreme Court #01072

Louis P. Vitti & Assoc., P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219

(412) 281-1725

**FILED**

NOV 05 2003

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD  
Plaintiff, :  
vs. :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :

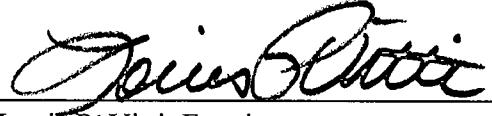
**PRAECIPE FOR DEFAULT JUDGMENT**  
**AND ASSESSMENT OF DAMAGES**

TO: PROTHONOTARY OF CLEARFIELD

Enter judgment in Default of an Answer in the amount of **\$43,976.14**, in favor of the Federal National Mortgage Association, et al, Plaintiff in the above-captioned action, against the Defendants, **David E. Williams and Geraldine L. Williams** and assess Plaintiff's damages as follows and/or as calculated in the Complaint:

Unpaid Principal Balance	<b>\$36,935.02</b>
Interest from <b>01/01/03-11/04/03</b> (Plus <b>\$7.5894</b> per day after <b>11/04/03</b> )	<b>2,329.94</b>
Late charges (Plus <b>\$11.33</b> per month from <b>06/11/03-Sale Date</b> )	<b>103.73</b>
Attorney's fee	<b>1,846.75</b>
Escrow Deficit (Plus any additional charges that may be incurred by the Plaintiff and transmitted to the sheriff as charges on the writ prior to the date of the sheriff's sale)	<b><u>2,760.70</u></b>
<b>Total Amount Due</b>	<b><u>\$43,976.14</u></b>

The real estate, which is the subject matter of the Complaint, is situate in Village of Bald Hill, Twp of Girard, Cty of Clearfield & State of PA. HET a dwg k/a P.O. Box 28, LeContes Mills, PA 16850. Parcel No. 114-006-644-199.

  
\_\_\_\_\_  
Louis P. Vitti, Esquire  
Attorney for the Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD  
Plaintiff, :  
vs. :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :

**CERTIFICATION OF MAILING**

I, Louis P. Vitti, do hereby certify that a Notice of Intention to Take Judgment was mailed to the Defendant(s), in the above-captioned case on October 24, 2003, giving ten (10) day notice that judgment would be entered should no action be taken.

LOUIS P. VITTI & ASSOCIATES, P.C.

BY:



Louis P. Vitti, Esquire  
Attorney for Plaintiff

SWORN to and subscribed

before me this 4th day

of November, 2003.

Sherry L. House

Notary Public Notarial Seal  
Sherry L. House, Notary Public  
Pleasant Hills Boro, Allegheny County  
My Commission Expires January 28, 2007  
Member, Pennsylvania Association Of Notaries

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., :  
vs. Plaintiff, :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, Defendants. :  
NO: 03-870-CD

## **IMPORTANT NOTICE**

TO: David E. Williams      Geraldine Williams      Geraldine Williams  
187 Willets Avenue      P.O. Box 28      187 Willets Avenue  
Little Egg Harbor, NJ 08087      Le Contes Mills, PA 16850      Little Egg Harbor, NJ 08087

Date of Notice: **October 24, 2003**

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 YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ON AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**PROTHONOTARY  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
(814) 765-2641 - EXT. 20**

LOUIS P. VITTI & ASSOCIATES, P.C.

BY:

Louis P. Vitti, Esquire  
Attorney for Plaintiff  
916 Fifth Avenue  
Pittsburgh, PA 15219

\*\* THE DEBT COLLECTOR IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.\*\*

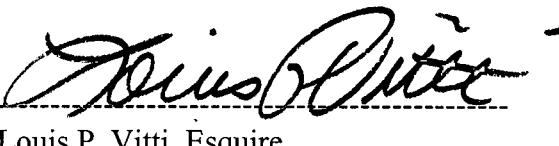
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

COMMONWEALTH OF PENNSYLVANIA, SS:

COUNTY OF ALLEGHENY

BEFORE me, the undersigned authority, personally appeared Louis P. Vitti, Esquire, who, being duly sworn according to law, deposes and says that he is advised and believes that DEFENDANT(S) is/are not presently in the active military service of the United States of America and not members of the Army of the United States, United States Navy, the Marine Corps, or the Coast Guard, and not officers of the Public Health Service detailed by proper authority for duty with the Army or Navy; nor engaged in any active military service or duty with any military or naval units covered by the Soldiers and Sailors Civil Relief Act of 1940 and designated therein as military service, and to the best of this affiant's knowledge is/are not enlisted in military service covered by said act, and that the averments herein set forth, insofar as they are within his knowledge, are correct, and true; and insofar as they are based on information received from others, are true and correct as he verily believes.

This Affidavit is made under the provisions of the Soldiers and Sailors Civil Relief Act of 1940.



Louis P. Vitti, Esquire

SWORN to and subscribed

before me this 4th day

of November, 2003.



Notary Public Seal

Sherry L. House, Notary Public  
Pleasant Hills Boro, Allegheny County  
My Commission Expires January 28, 2007

Member, Pennsylvania Association Of Notaries

**COPY**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD  
Plaintiff, :  
vs. :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :

**NOTICE OF ORDER, DECREE OR JUDGMENT**

TO: DEFENDANT(S)

You are hereby notified that a judgment was entered in the above-captioned proceeding on the 5<sup>th</sup> day of Nov. 2003.

Judgment is as follows: \$43,976.14.

## Deputy

\*\* THE DEBT COLLECTOR IS ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.\*\*

David E. Williams  
187 Willets Ave.  
Little Egg Harbor, NJ 08087

Geraldine L. Williams  
PO Box 28  
LeContes Milles, PA 16850

Geraldine L. Williams  
187 Willets Ave.  
Little Egg Harbor, NJ 08087

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

COPY

Federal National Mortgage Association,  
assignee of Pennsylvania Housing Finance  
Agency, assignee of Mellon Bank, N.A.,  
Successor Trustee, assignee of Corestates Bank,  
N.A., Trustee for Pennsylvania Housing Finance  
Agency, assignee of Towne & Country  
Mortgage Corp.  
Plaintiff(s)

No.: 2003-00870-CD

Real Debt: \$43,976.14

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

David E. Williams Entry: \$20.00  
Geraldine L. Williams  
Defendant(s)

Instrument: Default Judgment

Date of Entry: November 5, 2003

Expires: November 5, 2008

Certified from the record this 5th day of November, 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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION, assignee of  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of MELLON BANK,  
N.A., Successor Trustee, assignee of  
CORESTATES BANK, N.A., Trustee for  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of TOWNE &  
COUNTRY MORTGAGE CORP.,

Plaintiff,

vs.

DAVID E. WILLIAMS and GERALDINE  
L. WILLIAMS, husband and wife,

Defendants.

CIVIL DIVISION

NO. 03-870-CD

**PRAECIPE FOR WRIT OF  
EXECUTION AND AFFIDAVIT OF  
LAST KNOWN ADDRESS**

Code MORTGAGE FORECLOSURE

Filed on behalf of  
Plaintiff

Counsel of record for this  
party:

Louis P. Vitti, Esquire  
PA I.D. #3810  
Supreme Court #01072

Louis P. Vitti & Assoc., P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219

(412) 281-1725

**FILED**

NOV 05 2003

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD  
Plaintiff, :  
vs. :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :

**PRAECIPE FOR WRIT OF  
EXECUTION IN MORTGAGE FORECLOSURE**

TO: PROTHONOTARY OF CLEARFIELD COUNTY

Issue a Writ of Execution in favor of the Plaintiff and against the Defendant(s) in the  
above-captioned matter as follows:

Amount Due **\$43,976.14**

Interest **11/05/03-Sale Date** \_\_\_\_\_.

Total **\$** \_\_\_\_\_.

*140.00 Prothonotary costs*  
The real estate, which is the subject matter of the Praecipe for Writ of Execution is situated  
in:

Village of Bald Hill, Twp of Girard, Cty of Clearfield & State of PA. HET a dwg k/a P.O. Box 28,  
LeContes Mills, PA 16850. Parcel No. 114-006-644-199.

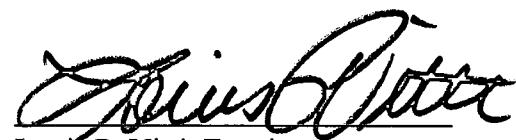
  
Louis P. Vitti, Esquire  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD  
Plaintiff, :  
vs. :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :

**AFFIDAVIT**

I, Louis P. Vitti, do hereby swear that, to the best of my knowledge, information and belief,  
the Defendant(s), is/are the owners of the real property on which the Plaintiff seeks to execute. That  
the Defendants' David E. Williams last known address is 187 Willets Avenue, Little Egg Harbor, NJ  
08087 and Defendants' Geraldine L. Williams last known address is P.O. Box 28, LeContes Mills, PA  
16850 and/or 187 Willets Avenue, Little Egg Harbor, NJ 08087.



Louis P. Vitti, Esquire

SWORN TO and subscribed

before me this 4th day of

November, 2003.

*Sherry L. House*

Notary Seal  
Sherry L. House, Notary Public  
Pleasant Hills Boro, Allegheny County  
My Commission Expires January 28, 2007

Member, Pennsylvania Association Of Notaries

FILED Aug 2000

NOV 5 2003 1cc & levants w/ prop descr. to Sheriff

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD  
Plaintiff, :  
vs. :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :

**AFFIDAVIT PURSUANT TO RULE 3129.1**

Federal National Mortgage Association, et al, Plaintiff in the above action, sets forth as of the date the Praeclipe for the Writ of Execution was filed the following information concerning the real property located at P.O. Box 28, LeContes Mills, PA 16850.

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

Name:	Address (Please indicate if this cannot be reasonably ascertained)
Geraldine Williams	P.O. Box 28 LeContes Mills, PA 16850
David E. Williams Geraldine L. Williams	187 Willets Avenue Little Egg Harbor, NJ 08087

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

Name:	Address (Please indicate if this cannot be reasonably ascertained)
Same as No. 1 above.	

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

Name: Address (Please indicate if this cannot be reasonably ascertained)

NONE

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

Name Address (Please indicate if this cannot be reasonably ascertained)

NONE

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

Name Address (Please indicate if this cannot be reasonably ascertained)

None

6. Name and address of every other person who has any record interest in or record lien on the property and whose interest may be affected by the sale:

Name Address (Please indicate if this cannot be reasonably ascertained)

None

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 (Please indicate if this cannot be reasonably ascertained)

Tax Collector of Girard Township P.O. Box 54  
LeContes Mills, PA 16850

CKG Water Authority 777 Frenchville Road  
P.O. Box 104  
Frenchville, PA 16836

Girard Township Municipal Authority 165 Girard Circle  
P.O. Box 36  
LeContes Mills, PA 16863

Commonwealth of PA -DPW

P.O. Box 8016  
Harrisburg, PA 17105

Clerk of Courts  
Criminal/Civil Division

P.O. Box 549  
Clearfield, PA 16830

Tax Claim Bureau of Clearfield County

230 East Market Street  
Clearfield, PA 16830

Court of Common Pleas of  
Clearfield County  
Domestic Relations Division

P.O. Box 549  
Clearfield, PA 16830

Bureau of Compliance

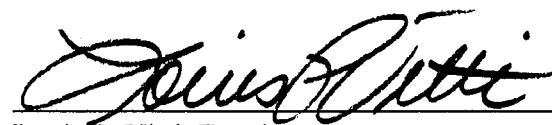
Clearance Support Section  
Dept. #281230  
Harrisburg, PA 17128-1230  
Attn: Susan Blough

Tenant/Occupant

P.O. Box 28  
LeContes Mills, PA 16850

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. Section 4904 relating to unsworn falsification to authorities.

November 4, 2003  
Date

  
Louis P. Vitti, Esquire  
Attorney for Plaintiff

SWORN TO and subscribed  
before me this 4th day  
of November, 2003.



Notary Public  
Sherry L. Douse, Notary Public  
Pleasant Hills Boro, Allegheny County  
My Commission Expires January 28, 2007  
Member, Pennsylvania Association Of Notaries

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD  
Plaintiff, :  
vs. :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :

**AFFIDAVIT**

I, Louis P. Vitti, do hereby swear that, to the best of my knowledge, information and belief, the Defendant(s), is/are the owners of the real property on which the Plaintiff seeks to execute. That the Defendants' David E. Williams last known address is 187 Willets Avenue, Little Egg Harbor, NJ 08087 and Defendants' Geraldine L. Williams last known address is P.O. Box 28, LeContes Mills, PA 16850 and/or 187 Willets Avenue, Little Egg Harbor, NJ 08087.

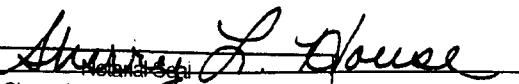


Louis P. Vitti

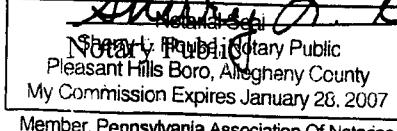
SWORN TO and subscribed

before me this 4th day of

November, 2003.



Shirley L. House



Member, Pennsylvania Association Of Notaries

**WRIT OF EXECUTION and/or ATTACHMENT  
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD  
CIVIL ACTION – LAW**

Federal National Mortgage Association,  
assignee of Pennsylvania Housing Finance  
Agency, assignee of Mellon Bank, N.A.,  
Successor Trustee, assignee of Corestates Bank,  
N.A., Trustee for Pennsylvania Housing Finance  
Agency, assignee of Towne & Country  
Mortgage Corp.

**COPY**

Vs.

NO.: 2003-00870-CD

David E. Williams and  
Geraldine L. Williams, husband and wife

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the debt, interest and costs due Federal National Mortgage Association, assignee of Pennsylvania Housing Finance Agency, assignee of Mellon Bank, N.A., Successor Trustee, assignee of Corestates Bank, N.A., Trustee for Pennsylvania Housing Finance Agency, assignee of Towne & Country Mortgage Corp., Plaintiff(s) from DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, husband and wife, Defendant(s):

- (1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:  
See Attached Description
- (2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:  
Garnishee(s) as follows:  
and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;
- (3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE: \$43,976.14  
INTEREST 11/5/03-Sale Date  
PROTH. COSTS: \$  
ATTY'S COMM: \$  
DATE: 11/05/2003

PAID: \$140.00  
SHERIFF: \$  
OTHER COSTS: \$

Received this writ this \_\_\_\_\_ day  
of \_\_\_\_\_ A.D. \_\_\_\_\_  
At \_\_\_\_\_ A.M./P.M.

---

William A. Shaw  
Prothonotary/Clerk Civil Division

Requesting Party: Louis P. Vitti, Esq.  
916 Fifth Ave.  
Pittsburgh, PA 15219  
(412) 281-1725

Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD  
Plaintiff, :  
vs. :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :

LEGAL DESCRIPTION

ALL that certain parcel of land situate in the Village of Bald Hill in the Township of Girard, County of Clearfield and State of Pennsylvania, Bounded and described as follows:

BEGINNING at a stake in the line of land of Harry T. Smith; thence N.  $83^{\circ} 31'$  W. 136.3 feet to a stake; thence still by land of Harry T. Smith N.  $5^{\circ} 25'$  E. 252.5 feet to a stake in the line of land of the Isaac Smith Estate; thence by land of the Isaac Smith Estate S.  $82^{\circ} 45'$  E. 146.1 feet to an iron spike; thence by land conveyed to Bernard Rolley S.  $4^{\circ} 59'$  W. 145.8 feet to an iron spike; thence by land of Harry T. Smith S.  $11^{\circ} 44'$  W. 105.6 feet to a stake and the place of beginning.

CONTAINING .821 of an acre.

HAVING erected thereon a dwelling known as P.O. Box 28, LeContes Mills, PA 16850.

BEING the same premises which James E. Luzier and Dorothy Luzier, husband and wife, by their Deed dated 7/28/1995 and recorded 08/07/1995 in the Recorder's Office of Clearfield County, Pennsylvania, Deed Book Volume 1694, page 238, granted and conveyed unto David E. Williams and Gerri Williams, husband and wife.

PARCEL NO. 114-066-644-199.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION, assignee of  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of MELLON BANK,  
N.A., Successor Trustee, assignee of  
CORESTATES BANK, N.A., Trustee for  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of TOWNE &  
COUNTRY MORTGAGE CORP.,

CIVIL DIVISION

NO. 03-870-CD

**AMENDED AFFIDAVIT PURSUANT  
TO RULE 3129.1**

Code MORTGAGE FORECLOSURE

Filed on behalf of  
Plaintiff

Counsel of record for this  
party:

Louis P. Vitti, Esquire  
PA I.D. #3810  
Supreme Court #01072

Louis P. Vitti & Assoc., P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219

(412) 281-1725

**FILED**

NOV 21 2003

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD  
Plaintiff, :  
vs. :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :

**AMENDED AFFIDAVIT PURSUANT TO RULE 3129.1**

Federal National Mortgage Association, et al, Plaintiff in the above action, sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at P.O. Box 28, LeContes Mills, PA 16850.

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

Name:	Address (Please indicate if this cannot be reasonably ascertained)
Geraldine Williams	P.O. Box 28 LeContes Mills, PA 16850
David E. Williams Geraldine L. Williams	187 Willets Avenue Little Egg Harbor, NJ 08087

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

Name:	Address (Please indicate if this cannot be reasonably ascertained)
Same as No. 1 above.	

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

Name: Address (Please indicate if this cannot be reasonably ascertained)

Nationwide Insurance Co.  
#00-357-CD West Chester Plaza  
West Chester, PA 19380

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

Name Address (Please indicate if this cannot be reasonably ascertained)

NONE

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

Name Address (Please indicate if this cannot be reasonably ascertained)

None

6. Name and address of every other person who has any record interest in or record lien on the property and whose interest may be affected by the sale:

Name Address (Please indicate if this cannot be reasonably ascertained)

None

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 (Please indicate if this cannot be reasonably ascertained)

Tax Collector of Girard Township P.O. Box 54  
LeContes Mills, PA 16850

CKG Water Authority 777 Frenchville Road  
P.O. Box 104  
Frenchville, PA 16836

Girard Township Municipal Authority 165 Girard Circle  
P.O. Box 36  
LeContes Mills, PA 16863

Commonwealth of PA -DPW

P.O. Box 8016  
Harrisburg, PA 17105

Clerk of Courts  
Criminal/Civil Division

P.O. Box 549  
Clearfield, PA 16830

Tax Claim Bureau of Clearfield County

230 East Market Street  
Clearfield, PA 16830

Court of Common Pleas of  
Clearfield County  
Domestic Relations Division

P.O. Box 549  
Clearfield, PA 16830

Bureau of Compliance

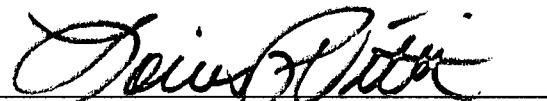
Clearance Support Section  
Dept. #281230  
Harrisburg, PA 17128-1230  
Attn: Susan Blough

Tenant/Occupant

P.O. Box 28  
LeContes Mills, PA 16850

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. Section 4904 relating to unsworn falsification to authorities.

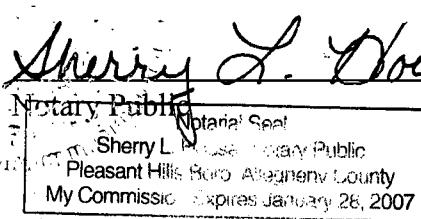
November 19, 2003  
Date

  
\_\_\_\_\_  
Louis P. Vitti, Esquire  
Attorney for Plaintiff

SWORN TO and subscribed

before me this 19th day

of November, 2003.

  
Notary Public  
Notarial Seal  
Sherry L. House Notary Public  
Pleasant Hills Boro, Allegheny County  
My Commission Expires January 26, 2007

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE  
ASSOCIATION, assignee of  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of MELLON BANK,  
N.A., Successor Trustee, assignee of  
CORESTATES BANK, N.A., Trustee for  
PENNSYLVANIA HOUSING FINANCE  
AGENCY, assignee of TOWNE &  
COUNTRY MORTGAGE CORP.,

CIVIL DIVISION

NO. 03-870-CD

**AFFIDAVIT OF SERVICE**

Filed on behalf of  
Plaintiff

Counsel of record for this  
party:

Louis P. Vitti, Esquire  
PA I.D. #3810  
Supreme Court #01072

DAVID E. WILLIAMS and GERALDINE  
L. WILLIAMS, husband and wife,

Louis P. Vitti & Assoc., P.C.  
916 Fifth Avenue  
Pittsburgh, PA 15219

(412) 281-1725

Defendants.

**FILED**

**JAN 09 2004**

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, assignee :  
of PENNSYLVANIA HOUSING FINANCE AGENCY, assignee :  
of MELLON BANK, N.A., Successor Trustee, assignee of :  
CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD

Plaintiff, :  
vs. :  
:

DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :  
:

**AFFIDAVIT OF SERVICE**

I, Sherry L. House, do hereby certify that a Notice of Sale was mailed and served upon the Defendants and all lien holders by Certificate of Mailing for service in the above-captioned case on December 5, 2003, advising them of the Sheriff's sale of the property at P.O. Box 28, Le Contes Mills, PA 16850, *on February 6, 2004.*

LOUIS P. VITTI & ASSOCIATES, P.C.

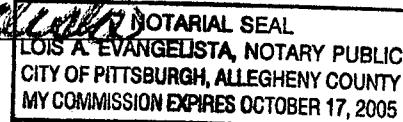
BY   
Sherry L. House

SWORN to and subscribed

before me this 7th day

of January, 2004.

  
Notary Public



U.S. POSTAL SERVICE

**CERTIFICATE OF MAILING**

MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT  
PROVIDE FOR INSURANCE-POSTMASTER

Received From:

**Louis P. Vitti & Associates, P.C.**  
**916 Fifth Avenue, Pittsburgh, PA 15219**

One piece of ordinary mail addressed to:

Tax Collector of Girard Township  
P.O. Box 54  
LeContes Mills, PA 16850

PS Form 3817, January 2001

U.S. POSTAL SERVICE

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Received From:

**Louis P. Vitti & Associates, P.C.**  
**916 Fifth Avenue, Pittsburgh, PA 15219**

One piece of ordinary mail addressed to:

Commonwealth of PA-DPW  
P.O. Box 8016  
Harrisburg, PA 17105

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One piece of ordinary mail addressed to:

Clerk of Courts  
Criminal/Civil Division  
P.O. Box 549  
Clearfield, PA 16830

PS Form 3817, January 2001

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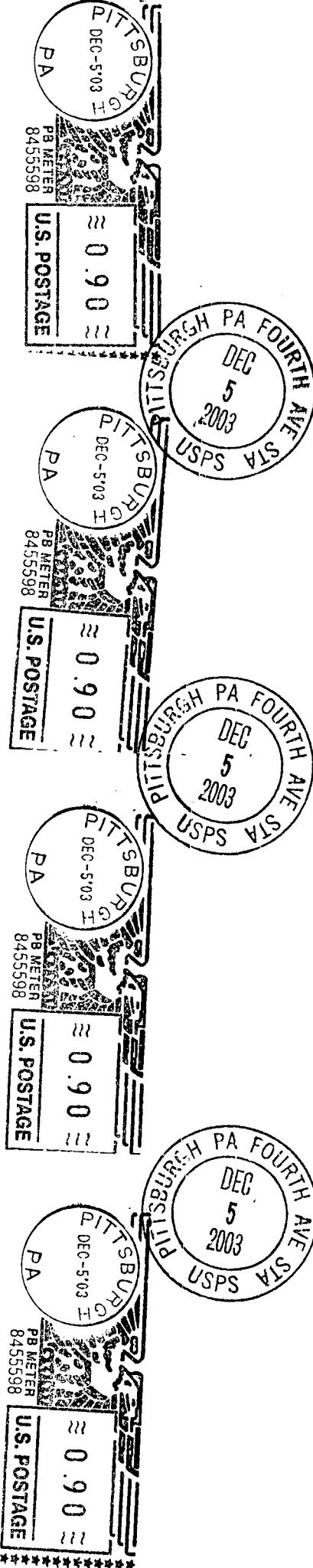
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Tax Claim Bureau of Clearfield County  
230 East Market Street  
Clearfield, PA 16830

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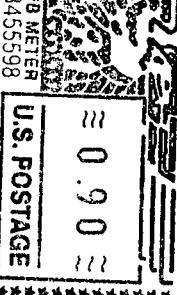
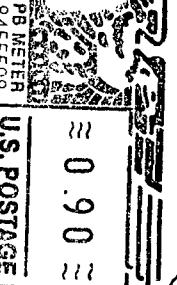
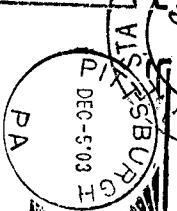
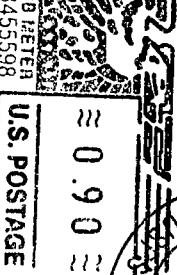
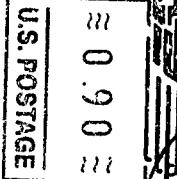
Received From:

**Louis P. Vitti & Associates, P.C.**  
**916 Fifth Avenue, Pittsburgh, PA 15219**

One piece of ordinary mail addressed to:

Court of Common Pleas of Clearfield County  
Domestic Relations Division  
P.O. Box 549  
Clearfield, PA 16830

PS Form 3817, January 2001



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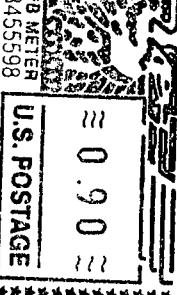
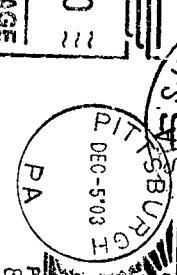
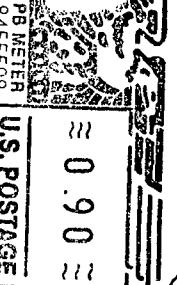
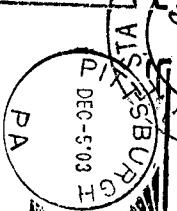
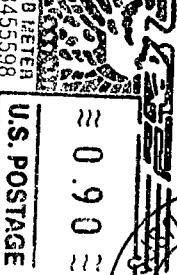
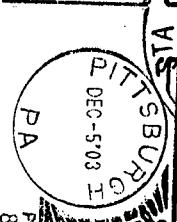
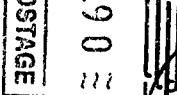
Received From:

**Louis P. Vitti & Associates, P.C.**  
**916 Fifth Avenue, Pittsburgh, PA 15219**

One piece of ordinary mail addressed to:

Bureau of Compliance  
Clearance Support Section  
Dept. #281230  
Harrisburg, PA 17128-1230  
Att: Susan Blough

PS Form 3817, January 2001



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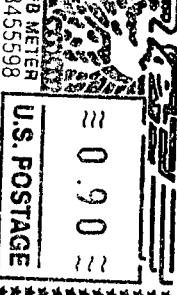
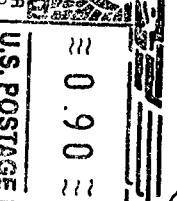
Received From:

**Louis P. Vitti & Associates, P.C.**  
**916 Fifth Avenue, Pittsburgh, PA 15219**

One piece of ordinary mail addressed to:

Tenant/Occupant  
P.O. Box 28  
LeContes Mills, PA 16850

PS Form 3817, January 2001



U.S. POSTAL SERVICE

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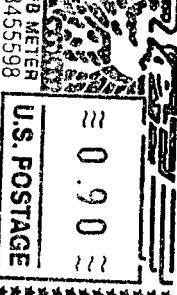
Received From:

**Louis P. Vitti & Associates, P.C.**  
**916 Fifth Avenue, Pittsburgh, PA 15219**

One piece of ordinary mail addressed to:

Girard Township Municipal Authority  
165 Girard Circle  
P.O. Box 36  
LeContes Mills, PA 16836

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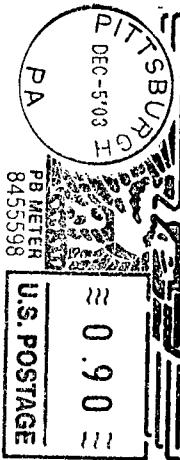
**Louis P. Vitti & Associates, P.C.**

**916 Fifth Avenue, Pittsburgh, PA 15219**

One piece of ordinary mail addressed to:

CKG Water Authority  
777 Franchville Road  
P.O. Box 104  
Frenchville, PA 16836

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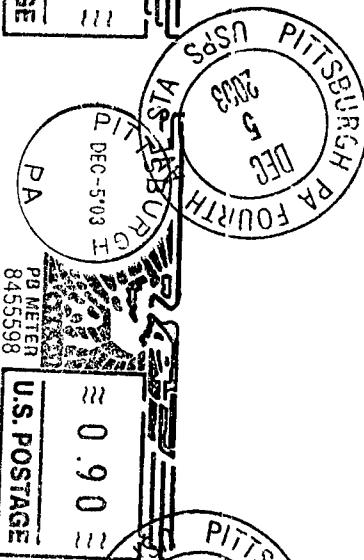
**Louis P. Vitti & Associates, P.C.**

**916 Fifth Avenue, Pittsburgh, PA 15219**

One piece of ordinary mail addressed to:

David E. Williams  
187 Willets Avenue  
Little Egg Harbor, NJ 08087

PS Form 3817, January 2001



U.S. POSTAL SERVICE

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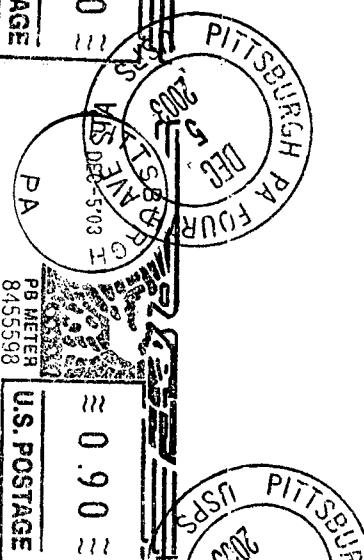
**Louis P. Vitti & Associates, P.C.**

**916 Fifth Avenue, Pittsburgh, PA 15219**

One piece of ordinary mail addressed to:

Geraldine L. Williams  
P.O. Box 28  
LeContes Mills, PA 16850

PS Form 3817, January 2001



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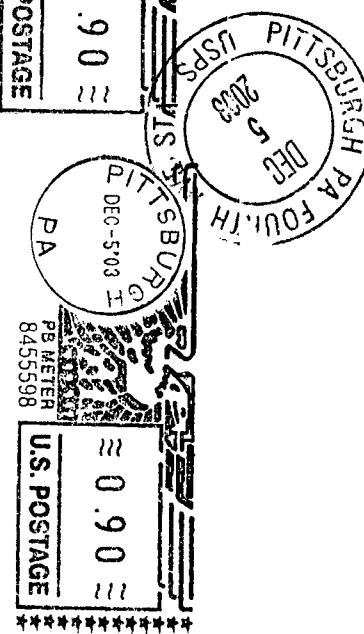
**Louis P. Vitti & Associates, P.C.**

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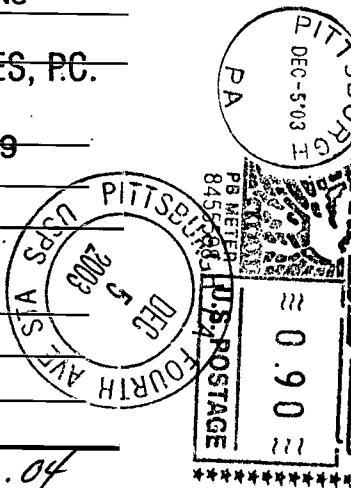
One piece of ordinary mail addressed to:

Geraldine L. Williams  
187 Willets Avenue  
Little Egg Harbor, NJ 08087

PS Form 3817, January 2001



U.S. POSTAL SERVICE	CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMASTER	
<b>LOUIS P. VITTI &amp; ASSOCIATES, P.C.</b> Received From: <b>916 FIFTH AVENUE</b> <b>PITTSBURGH, PA 15219</b> <b>(412) 281-1725</b>	
One piece of ordinary mail addressed to: <b>Nationwide Insurance Co.</b> <b>West Chester Plaza</b> <b>West Chester, PA 19380</b>	



PS Form 3817, January 2001 slh.williams. 2.6.04

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

**Sheriff Docket # 14888**

**FEDERAL NATIONAL MORTGAGE ASSOCIATION ET AL 03-870-CD**

**03-870-CD**

**VS.**

**WILLIAMS, DAVID E.**

**WRIT OF EXECUTION REAL ESTATE**

**SHERIFF RETURNS**

**NOW, DECEMBER 8, 2003 @ 11:20 A.M. O'CLOCK A LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDNATS. THE PROPERTY WAS ALSO POSTED THIS DATE AND TIME.**

**A SALE DATE OF FEBRUARY 6, 2004 WAS SET.**

**NOW, DECEMBER 11, 2003 MAILED BY REGULAR AND CERTIFIED MAIL TO DAVID E. WILLIAMS, DEFENDANT, AT 187 WILLETS AVENUE, LITTLE EGG HARBOR, NJ 08087, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY, PER COURT ORDER DATED 9/26/03.  
CERTIFIED #70022410000372241814**

**NOW, DECEMBER 11, 2003 MAILED BY REGULAR AND CERTIFIED MAIL TO GERALDINE L. WILLIAMS, DEFENDANT, AT 187 WILLETS AVENUE, LITTLE EGG HARBOR, NJ 08087, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY, PER COURT ORDER DATED 9/26/03. CERTIFIED #70022410000372241821**

**NOW, JANUARY 12, 2004 RECEIVED UNCLAIMED CERTIFIED MAIL FOR DAVID E. WILLIAMS, DEFENDANT.**

**NOW, JANUARY 12, 2004 RECEIVED UNCLAIMED CERTIFIED MAIL FOR GERALDINE L. WILLIAMS, DEFENDANT.**

**FILED**

*of 11:17 AM*  
**APR 16 2004**

*WAD*  
William A. Shaw  
Prothonotary/Clerk of Courts

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

**Sheriff Docket # 14888**

**FEDERAL NATIONAL MORTGAGE ASSOCIATION ET AL 03-870-CD**

**03-870-CD**

**VS.**

**WILLIAMS, DAVID E.**

**WRIT OF EXECUTION      REAL ESTATE**

**SHERIFF RETURNS**

---

**NOW, FEBRUARY 6, 2004 A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANTS. THE PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR \$1.00 + COSTS.**

**NOW, APRIL 15, 2004 PAID THE COSTS FROM THE ADVANCE AND MADE A REFUND OF THE UNUSED ADVANCE TO THE PLAINTIFF'S ATTORNEY.**

**NOW, APRIL 16, 2004 RETURN WRIT AS A SALE BEING HELD ON THE PROPERTY OF THE DEFENDANTS. THE PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR \$1.00 + CSOTS.**

**NOW, APRIL 16, 2004 THE DEED WAS FILED.**

**SHERIFF HAWKINS      \$219.66  
SURCHARGE              \$40.00  
PAID BY ATTORNEY**

---

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 14888

FEDERAL NATIONAL MORTGAGE ASSOCIATION ET AL 03-870-CD

03-870-CD

VS.

WILLIAMS, DAVID E.

WRIT OF EXECUTION      REAL ESTATE

**SHERIFF RETURNS**

---

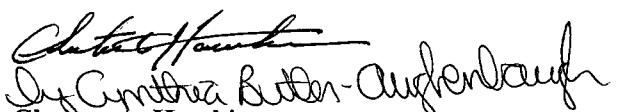
Sworn to Before Me This

16<sup>th</sup> Day Of April 2004



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

So Answers,

  
Chester A. Hawkins  
Sheriff

**WRIT OF EXECUTION and/or ATTACHMENT  
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD  
CIVIL ACTION – LAW**

Federal National Mortgage Association,  
assignee of Pennsylvania Housing Finance  
Agency, assignee of Mellon Bank, N.A.,  
Successor Trustee, assignee of Corestates Bank,  
N.A., Trustee for Pennsylvania Housing Finance  
Agency, assignee of Towne & Country  
Mortgage Corp.

Vs.

NO.: 2003-00870-CD

David E. Williams and  
Geraldine L. Williams, husband and wife

**TO THE SHERIFF OF CLEARFIELD COUNTY:**

To satisfy the debt, interest and costs due Federal National Mortgage Association, assignee of Pennsylvania Housing Finance Agency, assignee of Mellon Bank, N.A., Successor Trustee, assignee of Corestates Bank, N.A., Trustee for Pennsylvania Housing Finance Agency, assignee of Towne & Country Mortgage Corp., Plaintiff(s) from DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, husband and wife, Defendant(s):

(1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:  
See Attached Description

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:

Garnishee(s) as follows:

and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;

(3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE: \$43,976.14  
INTEREST 11/5/03-Sale Date  
PROTH. COSTS: \$  
ATTY'S COMM: \$  
DATE: 11/05/2003

PAID: \$140.00  
SHERIFF: \$  
OTHER COSTS: \$

  
\_\_\_\_\_  
William A. Shaw

Prothonotary/Clerk Civil Division

Received this writ this 5<sup>th</sup> day  
of November A.D. 2003  
At 3:15 A.M.P.M.

Requesting Party: Louis P. Vitti, Esq.  
916 Fifth Ave.  
Pittsburgh, PA 15219  
(412) 281-1725

Chesler A. Hawkins  
Sheriff by Cynthia Butler-Dugger

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, :  
assignee of PENNSYLVANIA HOUSING FINANCE AGENCY, :  
assignee of MELLON BANK, N.A., Successor Trustee, assignee :  
of CORESTATES BANK, N.A., Trustee for PENNSYLVANIA :  
HOUSING FINANCE AGENCY, assignee of TOWNE & :  
COUNTRY MORTGAGE CORP., : NO: 03-870-CD  
Plaintiff, :  
vs. :  
DAVID E. WILLIAMS and GERALDINE L. WILLIAMS, :  
husband and wife, :  
Defendants. :

LEGAL DESCRIPTION

ALL that certain parcel of land situate in the Village of Bald Hill in the Township of Girard, County of Clearfield and State of Pennsylvania, Bounded and described as follows:

BEGINNING at a stake in the line of land of Harry T. Smith; thence N.  $83^{\circ} 31'$  W. 136.3 feet to a stake; thence still by land of Harry T. Smith N.  $5^{\circ} 25'$  E. 252.5 feet to a stake in the line of land of the Isaac Smith Estate; thence by land of the Isaac Smith Estate S.  $82^{\circ} 45'$  E. 146.1 feet to an iron spike; thence by land conveyed to Bernard Rolley S.  $4^{\circ} 59'$  W. 145.8 feet to an iron spike; thence by land of Harry T. Smith S.  $11^{\circ} 44'$  W. 105.6 feet to a stake and the place of beginning.

CONTAINING .821 of an acre.

HAVING erected thereon a dwelling known as P.O. Box 28, LeContes Mills, PA 16850.

BEING the same premises which James E. Luzier and Dorothy Luzier, husband and wife, by their Deed dated 7/28/1995 and recorded 08/07/1995 in the Recorder's Office of Clearfield County, Pennsylvania, Deed Book Volume 1694, page 238, granted and conveyed unto David E. Williams and Gerri Williams, husband and wife.

PARCEL NO. 114-066-644-199.

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME WILLIAMS NO. 03-870-CD

NOW, February 6, 2004, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on the 6TH day of FEBRUARY 2004, I exposed the within described real estate of DAVID W. WILLIAMS AND GERALDINE L. WILLIAMS, HUSBAND AND WIFE to public venue or outcry at which time and place I sold the same to FEDERAL NATIONAL MORTGAGE ASSOCIATION, ASSIGNEE OF PENNSYLVANIA HOUSING FINANCE AGENCY, ASSIGNEE OF MELLON BANK, N.A. SUCCESSOR ET AL 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	
MILEAGE	9.36
LEVY	15.00
MILEAGE	9.36
POSTING	15.00
CSDS	10.00
COMMISSION 2%	
POSTAGE	14.94
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES/BILLING	15.00
	5.00
BILLING/PHONE/FAX	10.00
<b>TOTAL SHERIFF COSTS</b>	<b>219.66</b>
<b>DEED COSTS:</b>	
ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	31.00
TRANSFER TAX 2%	
<b>TOTAL DEED COSTS</b>	<b>31.00</b>

## PLAINTIFF COSTS, DEBT & INTEREST:

DEBT-AMOUNT DUE	43,976.14
INTEREST	FROM 11/5/03
TO BE ADDED	TO SALE DATE
ATTORNEY FEES	
PROTH. SATISFACTION	
LATE CHARGES & FEES	
COST OF SUIT -TO BE ADDED	
FORECLOSURE FEES/ESCROW DEFICIT	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	
SATISFACTION FEE	
ESCROW DEFICIENCY	
 <b>TOTAL DEBT &amp; INTEREST</b>	 <b>43,976.14</b>
 <b>COSTS:</b>	
ADVERTISING	374.22
TAXES - collector	NONE
TAXES - tax claim	NONE
 DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	32.00
SHERIFF COSTS	219.66
LEGAL JOURNAL AD	146.00
PROTHONOTARY	140.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
 <b>TOTAL COSTS</b>	 <b>1,056.88</b>

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

CHESTER A HAWKINS Sheriff

**COPY**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

FEDERAL NATIONAL MORTGAGE ASSOCIATION, ) NO. 03-870-CD  
assignee of PENNSYLVANIA HOUSING FINANCE )  
AGENCY, assignee of MELLON BANK, N.A., )  
Successor Trustee, assignee of CORESTATES )  
BANK, N.A., Trustee for PENNSYLVANIA HOUSING )  
FINANCE AGENCY, assignee of TOWNE & )  
COUNTRY MORTGAGE CORP., )  
Plaintiff, )  
vs. )  
DAVID E. WILLIAMS and GERALDINE L. )  
WILLIAMS, husband and wife, )  
Defendants. )

**ORDER OF COURT**

NOW, this 26 day of September, 2003, it appearing to the Court  
that the Sheriff has been frustrated in service of process, it is Ordered, Adjudged and Decreed that  
service of the Complaint and all subsequent documents upon all Defendants be accomplished by  
ordinary mail to Defendant's last known address and by posting the property by the Sheriff in order  
to effect compliance with Rule 400, et seq. and Rule 3129.1, et seq.

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.

SEP 26 2003

Attest.

*John K. Reilly*  
Prothonotary/  
Clerk of Courts

**UNTRACED MAIL**



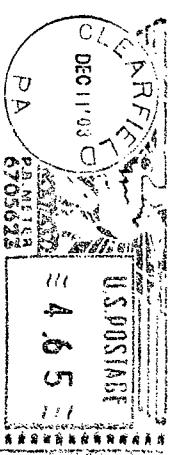
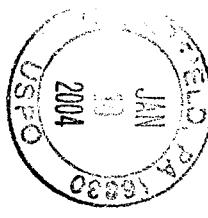
CHESTER A. HAWKINS

SHERIFF

COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830



7002 2410 0003 7224 1821



GERALDINE L. WILLIAMS  
187 WILLETS AVENUE  
LITTLE EGG HARBOR, NJ 08087

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

**UNCLAIMED**  
RTS  
RETURN TO SENDER

Received  
1/12/04

1/24  
1/31

**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:**

Geraldine L. Williams  
187 Willets Avenue  
Little Egg Harbor, NJ 08087

**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

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

## 2. Article Number

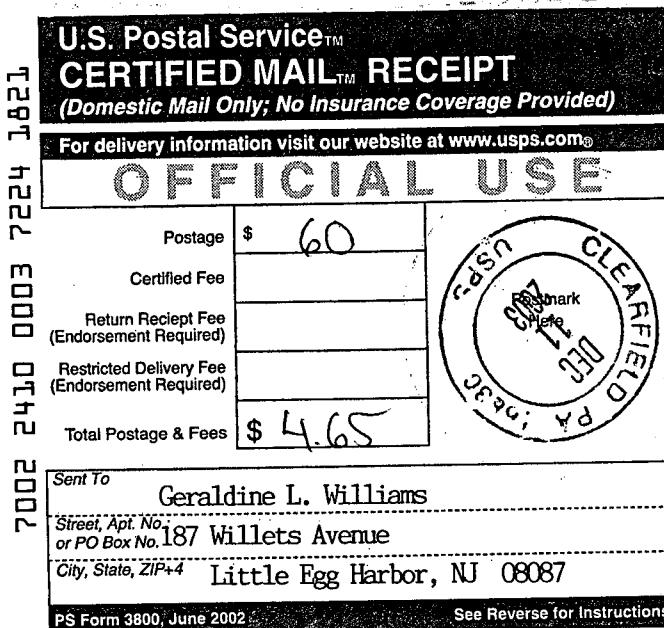
*(Transfer from service label)*

7002 2410 0003 7224 1821

PS Form 3811, August 2001

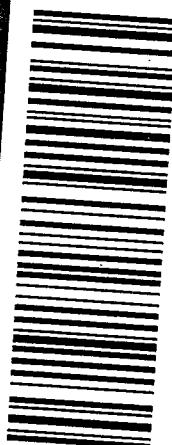
**Domestic Return Receipt**

102595-02-M-1540

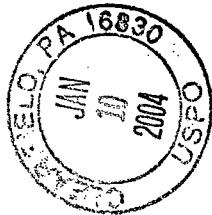
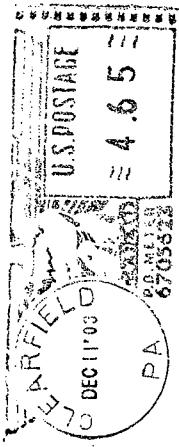




CHESTER A. HAWKINS  
SHERIFF  
COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830



7002 2410 0003 7224 1814



DAVID E. WILLIAMS  
187 WILLETS AVENUE  
LITTLE EGG HARBOR, NJ 08087

12/24  
12/31

Reseved  
1/12

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

**RTS**  
RETURN TO SENDER

**UNCLAIMED**

08087-97

**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:**

David E. Williams  
187 Willets Avenue  
Little Egg Harbor, NJ 08087

<b>COMPLETE THIS SECTION ON DELIVERY</b>	
<b>A. Signature</b>	
<input checked="" type="checkbox"/> X	
<b>B. Received by (Printed Name)</b>	<b>C. Date of Delivery</b>
<b>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</b>	
<b>3. Service Type</b>	
<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail	
<input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise	
<input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
<b>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</b>	

**2. Article Number**

(Transfer from service label)

7002 2410 0003 7224 1814

**PS Form 3811, August 2001**

Domestic Return Receipt

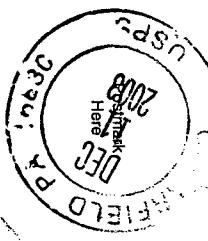
102595-02-M-1540

**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	\$ .60
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.95



7002 Sent To David E. Williams

Street, Apt. No.: 187 Willets Avenue

City, State, Zip+4: Little Egg Harbor, NJ 08087

PS Form 3800, June 2002

See Reverse for Instructions