

03-919-CD
WELLS FARGO BANK MINNESOTA N.A. vs. JAMES E. Serafin,

GOLDBECK McCAFFERTY & MCKEEVER
BY: JOSEPH A. GOLDBECK, JR.
ATTORNEY I.D. #16132
SUITE 500 – THE BOURSE BLDG.
111 S. INDEPENDENCE MALL EAST
PHILADELPHIA, PA 19106
(215) 627-1322
ATTORNEY FOR PLAINTIFF

WELLS FARGO BANK MINNESOTA NA C/O
COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX B-35
Plano, TX 75024-3632

Plaintiff

vs.

JAMES E. SERAFIN
CYNTHIA R. SERAFIN
and OCCUPANT(S)
613 Hale Street
Osceola Mills, PA 16666-1225

Defendant(s)

IN THE COURT OF COMMON PLEAS
OF Clearfield COUNTY
CIVIL ACTION - LAW
ACTION OF EJECTMENT

Term
No.

03-919-CD

CIVIL ACTION: EJECTMENT

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 the Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claim in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

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

PENNSYLVANIA BAR ASSOCIATION
P.O. Box 186, Harrisburg, PA 17108
800-692-7375

KEYSTONE LEGAL SERVICES
211 1/2 E. Locust Street, Clearfield, PA 16830
814-765-9646

A V I S O

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESARIO QUE USTED, O SU ABOGADO, REGISTRE CON LA CORTE EN FORMA ESCRITA, EL PUNTO DE VISTA DE USTED Y CUALQUIER OBJECCION CONTRA LAS QUEJAS EN ESTA DEMANDA.

RECUERDE: SI USTED NO REPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIR QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATEAMENTE.

SI NO CONOCE A UN ABOGADO, LLAME AL "LAWYER REFERENCE SERVICE" (SERVICIO DE REFERENCIA DE ABOGADOS), (215) 238-6300.

PENNSYLVANIA BAR ASSOCIATION
P.O. Box 186, Harrisburg, PA 17108
800-692-7375

KEYSTONE LEGAL SERVICES
211 1/2 E. Locust Street, Clearfield, PA 16830
814-765-9646

FILED

JUN 23 2003

William A. Shaw
Prothonotary

COMPLAINT IN EJECTMENT

1. Plaintiff is WELLS FARGO BANK MINNESOTA NA C/O COUNTRYWIDE HOME LOANS INC., 7105 Corporate Drive, PTX B-35, Plano, TX 75024-3632.
2. Defendants are JAMES E. SERAFIN, CYNTHIA R. SERAFIN, and OCCUPANT(S).
3. Plaintiff is the owner of premises 613 Hale Street, Osceola Mills, PA 16666-1225 a legal description of which is attached hereto.
4. Plaintiff became owner of said property by a Deed from the Sheriff of Clearfield, which deed was lodged and settlement made with the Sheriff on (Abstract of Title) June 13, 2003.
5. Plaintiff, by virtue of the above, is the owner of said premises, and is entitled to possession thereof. The Defendants, JAMES E. SERAFIN, CYNTHIA R. SERAFIN and OCCUPANT(S), are occupying the same premises without right, and so far as the Plaintiff is informed, without claim of title.
6. Plaintiff has repeatedly demanded possession of the said premises from the said premises from the said Defendants, who have refused to deliver up possession of the same.

WHEREFORE, Plaintiff requests judgment for possession of the premises.



Joseph A. Goldbeck, Jr., Esq.

VERIFICATION

I, Joseph A. Goldbeck, Jr. as the Attorney of the Plaintiff corporation within named do hereby verify that I am authorized to and do make this verification on behalf of the Plaintiff corporation and the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: 6-20-03



Joseph A. Goldbeck, Jr.

#1296090 - JAMES E. SERAFIN and CYNTHIA R. SERAFIN

Legal Description:

ALL THAT CERTAIN LOT OR TRACT OF LAND SITUATE, LYING AND BEING IN BOROUGH OF OSCEOLA, CLEARFIELD COUNTY, PENNSYLVANIA, TOGETHER WITH THE IMPROVEMENTS THEREON, BOUNDED AND DESCRIBED AS FOLLOWS:

ON THE NORTH BY HALE STREET; ON THE EAST BY LOT NO. 303; ON THE SOUTH BY MAYS ALLEY AND ON THE WEST BY FRENCH STREET, AND KNOWN AS LOT NO. 304 IN THE GENERAL PLAN OF BOROUGH OF OSCEOLA, IT BEING FIFTY (50) FEET ON HALE STREET AND ONE HUNDRED FIFTY (150) FEET DEEP.

BEING THE SAME PREMISES WHICH VESTED IN JAMES E. SERAFIN AND CYNTHIA R. SERAFIN, HIS WIFE, BY DEED OF DOROTHY M. BROCAIL AND DONALD J. BROCAIL, HER HUSBAND, DATED DECEMBER 6, 1999 AND RECORDED DECEMBER 7, 1999 IN THE OFFICE OF THE RECORDER OF DEEDS IN AND FOR CLEARFIELD COUNTY, PENNSYLVANIA, AT INSTRUMENT #1999200004 FOR THE CONSIDERATION OF \$19,000.00.

BEING FURTHER IDENTIFIED AS TAX MAP #016-013-382-00019.

In The Court of Common Pleas of Clearfield County, Pennsylvania

WELLS FARGO BANK MINNESOTA

VS.

SERAFIN, JAMES E. & CYNTHIA R.

COMPLAINT IN EJECTMENT

Sheriff Docket # 14218

03-919-CD

SHERIFF RETURNS

NOW JUNE 26, 2003 AT 11:51 AM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON JAMES E. SERAFIN, DEFENDANT AT RESIDENCE, 613 HALE ST., OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JAMES E. SERAFIN A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: DAVIS/MORGILLO

NOW JUNE 26, 2003 AT 11:51 AM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON CYNTHIA R. SERAFIN, DEFENDANT AT RESIDENCE, 613 HALE ST., OSCEOLA MILLS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CYNTHIA SERAFIN A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: DAVIS/MORGILLO

NOW JULY 30, 2003 RETURN THE WITHIN COMPLAINT IN EJECTMENT "NOT SERVED" AS TO OCCUPANT AT 613 HALE ST., OSCEOLA MILLS, PA.

Return Costs

Cost	Description
43.40	SHERIFF HAWKINS PAID BY: ATTY CK# 178494
30.00	SURCHARGE PAID BY: ATTY CK# 178495

Sworn to Before Me This

30th Day Of July 2003
William A. Shaw

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

So Answers,

Chester A. Hawkins
Chester A. Hawkins
Sheriff

FILED

013:00 AM
JUL 30 2003

E. G. K.

William A. Shaw
Prothonotary/Clerk of Courts

GOLDBECK McCAFFERTY & McKEEVER
BY: JOSEPH A. GOLDBECK, JR.
ATTORNEY I.D. #16132
SUITE 500 – THE BOURSE BLDG.
111 S. INDEPENDENCE MALL EAST
PHILADELPHIA, PA 19106
(215) 627-1322
ATTORNEY FOR PLAINTIFF

WELLS FARGO BANK MINNESOTA NA C/O
COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX B-35
Plano, TX 75024-3632

Plaintiff

vs.

JAMES E. SERAFIN
CYNTHIA R. SERAFIN
and OCCUPANT(S)
613 Hale Street
Osceola Mills, PA 16666-1225

Defendant(s)

I HEREBY CERTIFY THAT THIS
IS A TRUE AND CORRECT COPY
OF THE ORIGINAL FILED.

IN THE COURT OF COMMON PLEAS
OF Clearfield COUNTY
CIVIL ACTION - LAW
ACTION OF EJECTMENT

Term
No. 03-919-CD

CIVIL ACTION: EJECTMENT

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 the Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claim in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

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

PENNSYLVANIA BAR ASSOCIATION
P.O. Box 186, Harrisburg, PA 17108
800-692-7375

KEYSTONE LEGAL SERVICES
211 1/2 E. Locust Street, Clearfield, PA 16830
814-765-9646

A V I S O

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESSARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESSARIO QUE USTED, O SU ABOGADO, REGISTRE CON LA CORTE EN FORMA ESCRITA, EL PUNTO DE VISTA DE USTED Y CUALQUIER OBJECCION CONTRA LAS QUEJAS EN ESTA DEMANDA.

RECUERDE: SI USTED NO REPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA CORTE PUEDE, SIN NOTIFICARLO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIR QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATEAMENTE.

SI NO CONOCE A UN ABOGADO, LLAME AL "LAWYER REFERENCE SERVICE" (SERVICIO DE REFERENCIA DE ABOGADOS), (215) 238-6300.

PENNSYLVANIA BAR ASSOCIATION
P.O. Box 186, Harrisburg, PA 17108
800-692-7375

KEYSTONE LEGAL SERVICES
211 1/2 E. Locust Street, Clearfield, PA 16830
814-765-9646

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

JUN 23 2003

Attest.

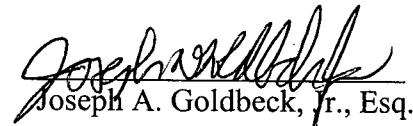
John A. Goldbeck
Prothonotary/
Clerk of Courts

I HEREBY CERTIFY THAT THIS
IS A TRUE AND CORRECT COPY
OF THE ORIGINAL FILED.

COMPLAINT IN EJECTMENT

1. Plaintiff is WELLS FARGO BANK MINNESOTA NA C/O COUNTRYWIDE HOME LOANS INC., 7105 Corporate Drive, PTX B-35, Plano, TX 75024-3632.
2. Defendants are JAMES E. SERAFIN, CYNTHIA R. SERAFIN, and OCCUPANT(S).
3. Plaintiff is the owner of premises 613 Hale Street, Osceola Mills, PA 16666-1225 a legal description of which is attached hereto.
4. Plaintiff became owner of said property by a Deed from the Sheriff of Clearfield, which deed was lodged and settlement made with the Sheriff on (Abstract of Title) June 13, 2003.
5. Plaintiff, by virtue of the above, is the owner of said premises, and is entitled to possession thereof. The Defendants, JAMES E. SERAFIN, CYNTHIA R. SERAFIN and OCCUPANT(S), are occupying the same premises without right, and so far as the Plaintiff is informed, without claim of title.
6. Plaintiff has repeatedly demanded possession of the said premises from the said premises from the said Defendants, who have refused to deliver up possession of the same.

WHEREFORE, Plaintiff requests judgment for possession of the premises.



Joseph A. Goldbeck, Jr., Esq.

VERIFICATION

I, Joseph A. Goldbeck, Jr. as the Attorney of the Plaintiff corporation within named do hereby verify that I am authorized to and do make this verification on behalf of the Plaintiff corporation and the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: 6-20-03



Joseph A. Goldbeck, Jr.

#1296090 - JAMES E. SERAFIN and CYNTHIA R. SERAFIN

Legal Description:

ALL THAT CERTAIN LOT OR TRACT OF LAND SITUATE, LYING AND BEING IN BOROUGH OF OSCEOLA, CLEARFIELD COUNTY, PENNSYLVANIA, TOGETHER WITH THE IMPROVEMENTS THEREON, BOUNDED AND DESCRIBED AS FOLLOWS:

ON THE NORTH BY HALE STREET; ON THE EAST BY LOT NO. 303; ON THE SOUTH BY MAYS ALLEY AND ON THE WEST BY FRENCH STREET, AND KNOWN AS LOT NO. 304 IN THE GENERAL PLAN OF BOROUGH OF OSCEOLA, IT BEING FIFTY (50) FEET ON HALE STREET AND ONE HUNDRED FIFTY (150) FEET DEEP.

BEING THE SAME PREMISES WHICH VESTED IN JAMES E. SERAFIN AND CYNTHIA R. SERAFIN, HIS WIFE, BY DEED OF DOROTHY M. BROCAIL AND DONALD J. BROCAIL, HER HUSBAND, DATED DECEMBER 6, 1999 AND RECORDED DECEMBER 7, 1999 IN THE OFFICE OF THE RECORDER OF DEEDS IN AND FOR CLEARFIELD COUNTY, PENNSYLVANIA, AT INSTRUMENT #1999200004 FOR THE CONSIDERATION OF \$19,000.00.

BEING FURTHER IDENTIFIED AS TAX MAP #016-013-382-00019.

GOLDBECK McCAFFERTY & McKEEVER

BY: Joseph A. Goldbeck, Jr.
Attorney I.D. #16132
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532
215-825-6319
Attorney for Plaintiff

WELLS FARGO BANK MINNESOTA NA
C/O COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX B-35
Plano, TX 75024-3632

Plaintiff

vs.

JAMES E. SERAFIN
CYNTHIA R. SERAFIN
613 Hale Street
Osceola Mills, PA 16666-1225

Defendant

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY

03-919-CD
Docket No. 00000

PRAECIPE TO DISCONTINUE AND END

TO THE PROTHONOTARY:

Kindly mark the above case Discontinued and Ended upon payment of your costs only.



JOSEPH A. GOLDBECK, JR., ESQUIRE

FILED
M 12:14 PM
JUN 27 2007 No Certificate
W A Shaw
William A. Shaw
Prothonotary/Clerk of Courts
Requested