

03-1486-CD  
CENDANT MORTGAGE CORP. vs. ROBERT M. BRICKLEY, et al.

In The Court of Common Pleas of Clearfield County, Pennsylvania

CENDANT MORTGAGE CORPORATOIN

VS.

BRICKLEY, ROBERT M. & ALYCIA D.

COMPLAINT IN MORTGAGE FORECLOSURE

Sheriff Docket # 14631

03-1486-CD

**SHERIFF RETURNS**

NOW OCTOBER 13, 2003 AT 2:40 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON ALYCIA D. BRICKLEY, DEFENDANT AT RESIDENCE, 410 NICHOLS ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ALYCIA D. BRICKLEY A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: COUDRIET

NOW OCTOBER 13, 2003 AT 2:40 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON ROBERT M. BRICKLEY, DEFENDANT AT RESIDENCE, 410 NICHOLS ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ALYCIA D. BRICKLEY, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: COUDRIET

Return Costs

| Cost  | Description                              |
|-------|--|
| 26.00 | SHERIFF HAWKINS PAID BY: ATTY CK# 305943 |
| 20.00 | SURCHARGE PAID BY: ATTY                  |

Sworn to Before Me This

14th Day Of Oct 2003  
William A. Shaw

So Answers,

Chester A. Hawkins  
by Maury Harr  
Chester A. Hawkins  
Sheriff

**FILED**

OCT 14 2003

011145 a.m.

William A. Shaw  
Prothonotary  
ma cc *[Signature]*

SALE DATE: 3/5/04

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION – LAW

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE No.: 2003-1486-CD  
CORPORATION

vs.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

FILED <sup>No cc</sup>  
m/10:55 AM  
FEB 11 2004 *gj*

William A. Shaw  
Prothonotary/Clerk of Courts

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

Plaintiff in the above action sets forth as of the date the Praeclipe for the Writ of Execution was filed the following information concerning the real property located at:

410 NICHOLS STREET, CLEARFIELD, PA 16830.

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

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

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION

CLEARFIELD COUNTY

No.: 2003-1486-CD

vs.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

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

CENDANT MORTGAGE CORPORATION, F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION, Plaintiff in the above action, by its attorney, Frank Federman, Esquire, sets forth as of the date the Praeclipe for the Writ of Execution was filed the following information concerning the real property located at 410 NICHOLS STREET, CLEARFIELD, PA 16830:

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

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

None.

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

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

|  |                                     |
|--|-------------------------------------|
| BENEFICIAL CONSUMER DISCOUNT COMPANY<br>D/B/A BENEFICIAL MORTGAGE CO OF PA | 90 BEAVER DRIVE<br>DUBOIS, PA 15801 |
|--|-------------------------------------|

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

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

None.

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

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

|                                      |  |
|--------------------------------------|--|
| Clearfield County Domestic Relations | Clearfield County Courthouse<br>230 East Market Street<br>Clearfield, PA 16830 |
|--------------------------------------|--|

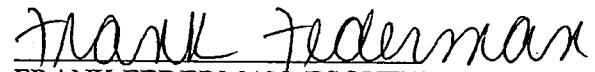
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale:

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

|   |                                     |
|---|-------------------------------------|
| Commonwealth of Pennsylvania<br>Department of Welfare | PO Box 2675<br>Harrisburg, PA 17105 |
|---|-------------------------------------|

|                 |  |
|-----------------|--|
| Tenant/Occupant | 410 NICHOLS STREET<br>CLEARFIELD, PA 16830 |
|-----------------|--|

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

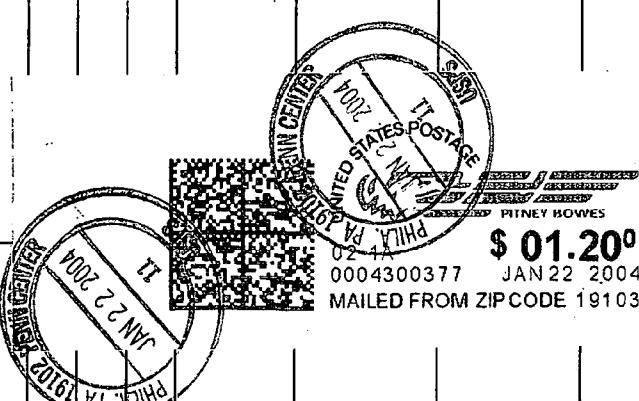
  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

November 13, 2003

Name and  
Address  
Of Sender

FEDDERMAN AND PHELAN, LLP  
One Penn Center at Suburban Station  
Philadelphia, PA 19103-1814      Suite 1400  
Dan G. Trautz/MLD

| Line                                       | Article Number                                    | Name of Addressee, Street, and Post Office Address   | Postage  | Fee |
|--|---|--|--|-----|
| 1  | ROBERT M.<br>BRICKLEY                             | Tenant/Occupant,<br>410 NICHOLS STREET,<br>CLEARFIELD, PA 16830  |  |     |
| 2  | 0015421050  | Clearfield County Domestic Relations<br>Clearfield County Courthouse<br>230 East Market Street<br>Clearfield, PA 16830 |  |     |
| 3  |   | Commonwealth of Pennsylvania<br>Department of Welfare<br>PO Box 2675<br>Harrisburg, PA 17105                           |  |     |
| 4  |   | BENEFICIAL CONSUMER DISCOUNT COMPANY<br>D/B/A BENEFICIAL MORTGAGE CO OF PA<br>90 BEAVER DRIVE<br>DUBOIS, PA 15801      |  |     |
| 5  |   |  |  |     |
| 6  |   |  |  |     |
| 7  |   |  |  |     |
| 8  |   |  |  |     |
| 9  |   |  |  |     |
| 10   |   |  |  |     |
| 11   |   |  |  |     |
| 12   |   |  |  |     |
| 13   |   |  |  |     |
| 14   |   |  |  |     |
| 15   |   |  |  |     |
| Total Number of<br>Pieces Listed By Sender | Total Number of Pieces<br>Received at Post Office | Postmaster, Per (Name Of Receiving<br>Employee)  | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000.00 per piece subject to a limit of \$50,000 per occurrence. The maximum indemnity payable on Express Mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional insurance. See Domestic Mail Manual R900, S913 and S921 for limitations of coverage. |     |



January 22, 2004

**CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION**

vs.  
**ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY**

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

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

**OWNER(S): ROBERT M. BRICKLEY and ALYCIA D. BRICKLEY**

**PROPERTY: 410 NICHOLS STREET, CLEARFIELD, PA 16830**

Improvements: Residential dwelling

Judgment Amount: **\$49,841.00**

**CLEARFIELD COUNTY  
No. 2003-1486-CD**

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on **MARCH 5, 2004**, at the Clearfield County Courthouse, 1 North 2<sup>nd</sup> Street, Suite 116, Clearfield, PA 16830 at **10:00 A.M.**

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

The Sheriff will file a schedule of Distribution on a date specified by the Sheriff not later than 30 days after sale. Distribution will be made in accordance with the schedule unless exceptions are filed thereto within 10 days after the filing of the schedule.

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

---

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION

---

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA

No. 2003-1486-CD

vs.

---

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

---

PRAECIPE FOR WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

To the Director of the Office of the Prothonotary:

Issue writ of execution in the above matter:

|            |                    |
|------------|--------------------|
| Amount Due | <u>\$49,841.00</u> |
|------------|--------------------|

|                                |   |
|--------------------------------|---|
| Interest from 11/17/03 to      | and Costs.                              |
| Date of Sale (\$8.19 per diem) | <u>125.00</u> <i>Prothonotary costs</i> |

*Frank Federman*  
Frank Federman, Esquire  
Attorney for Plaintiff  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814

Note: Please attach description of Property.

MLD

FILED

NOV 18 2003

William A. Shaw  
Prothonotary/Clerk of Courts

No. 2003-1486-CD

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION

Prothonotary/Clerk of Courts  
William A. Shaw Atty. pd. 30-00  
18 NOV 2003  
ALYCIA D. BRICKLEY  
FILED 11/14/2003  
Pursuant to Pa. Rule of Practice  
Signature

vs.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

PRAECLipe FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)

*Mark H. Hennan*  
Attorney for Plaintiff(s)

Address: 410 NICHOLS STREET, CLEARFIELD, PA 16830  
410 NICHOLS STREET, CLEARFIELD, PA 16830  
Where papers may be served.

ALL THAT CERTAIN lot situate in the Borough of Clearfield, Clearfield County, Pennsylvania, bounded and described as follows:

ON the North by Nichols Street and on the East by Eastern half of Lot No. 142; of lands now or formerly of Carl Pizzella on the South by an alley and on the West by Lot No. 143; of lands now or formerly of Margaret Haney being twenty-five (25) feet on front of Nichols Street and extending in depth one hundred eighty (180) feet, more or less, to an alley. Being No. 410 Nichols Street, Clearfield, Pennsylvania. Consisting of a two story tile house with seven rooms and bath, together with all structure, appurtenances, buildings and improvements.

Tax Parcel #43-K08-208-46

TITLE TO SAID PREMISES IS VESTED IN Robert M. Brickley and Alycia D. Brickley, husband and wife by Deed from Brent M. Snyder and Helena J. Snyder, husband and wife dated 6/25/2001 and recorded 6/26/2001, in Instrument #200109795.

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION No.: 2003-1486-CD  
CLARKE COUNTY

VS.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

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

CENDANT MORTGAGE CORPORATION, F/K/A COLDWELL BANKER MORTGAGE CORPORATION, Plaintiff in the above action, by its attorney, Frank Federman, Esquire, sets forth as of the date the Praeclipe for the Writ of Execution was filed the following information concerning the real property located at 410 NICHOLS STREET, CLEARFIELD, PA 16830:

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

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

ROBERT M. BRICKLEY 410 NICHOLS STREET  
CLEARFIELD, PA 16830

ALYCIA D. BRICKLEY 410 NICHOLS STREET  
CLEARFIELD, PA 16830

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

SAME AS ABOVE

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

Frank Federman  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

November 13, 2003

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION

CLEARFIELD COUNTY

No.: 2003-1486-CD

vs.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY.

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

CENDANT MORTGAGE CORPORATION, F/K/A COLDWELL BANKER MORTGAGE CORPORATION, Plaintiff in the above action, by its attorney, Frank Federman, Esquire, sets forth as of the date the Praeclipe for the Writ of Execution was filed the following information concerning the real property located at 410 NICHOLS STREET, CLEARFIELD, PA 16830:

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

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

None.

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

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

BENEFICIAL CONSUMER DISCOUNT COMPANY  
D/B/A BENEFICIAL MORTGAGE CO OF PA

90 BEAVER DRIVE  
DUBOIS, PA 15801

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

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

None.

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

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

|                                      |  |
|--------------------------------------|--|
| Clearfield County Domestic Relations | Clearfield County Courthouse<br>230 East Market Street<br>Clearfield, PA 16830 |
|--------------------------------------|--|

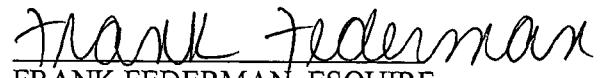
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale:

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

|   |                                     |
|---|-------------------------------------|
| Commonwealth of Pennsylvania<br>Department of Welfare | PO Box 2675<br>Harrisburg, PA 17105 |
|---|-------------------------------------|

|                 |  |
|-----------------|--|
| Tenant/Occupant | 410 NICHOLS STREET<br>CLEARFIELD, PA 16830 |
|-----------------|--|

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

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

November 13, 2003

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

ATTORNEY FOR PLAINTIFF  
COURT OF COMMON PLEAS  
CIVIL DIVISION

CENDANT MORTGAGE  
CORPORATION, F/K/A COLDWELL  
BANKER MORTGAGE CORPORATION

No.: 2003-1486-CD

vs.

CLEARFIELD COUNTY

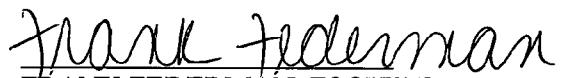
ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

CERTIFICATION

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

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

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

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

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

---

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION

---

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA

NO.: 2003-1486-CD

vs.

---

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

---

WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

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

Premises: **410 NICHOLS STREET, CLEARFIELD, PA 16830**

(See legal description attached.)

|   |   |
|---|---|
| Amount Due  | <u>\$49,841.00</u>  |
| Interest from 11/17/03 to<br>Date of Sale (\$8.19 per diem) | \$_____   |
| Total   | \$_____ Plus costs as endorsed.<br><i>125.00 Prothonotary Costs</i> |

Dated 11/18/03  
(SEAL)

Prothonotary, Common Pleas Court of  
Clearfield County, Pennsylvania

By: Deputy

MLD

No. 2003-1486-CD

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

CENDANT MORTGAGE CORPORATION, F/K/A COLDWELL BANKER  
MORTGAGE CORPORATION

VS.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

---

**WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

---

Real Debt \$49,841.00

Int. from 11/17/03 \_\_\_\_\_  
to Date of Sale (\$8.19 per diem)

Costs \_\_\_\_\_

Proth. Pd. 125.00

Sheriff \_\_\_\_\_

Mark Federman  
Attorney for Plaintiff

Address: 410 NICHOLS STREET, CLEARFIELD, PA 16830  
410 NICHOLS STREET, CLEARFIELD, PA 16830  
Where papers may be served.

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

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 15019

CENDANT MORTGAGE CORPORATION F/K/A COLDWELL BANKER MORT  
VS.  
BRICKLEY, ROBERT M.

03-1486-CD

WRIT OF EXECUTION                   REAL ESTATE

**SHERIFF RETURNS**

NOW, JANUARY 15, 2004 @ 11:00 A.M. O'CLOCK A LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDANT. THE PROPERTY WAS ALSO POSTED THIS DATE AND TIME.

A SALE DATE OF MARCH 5, 2004 WAS SET.

NOW, JANUARY 15, 2004 @ 11:00 A.M. O'CLOCK SERVED ROBERT M. BRICKLEY, DEFENDANT AT HIS RESIDENCE 410 NICHOLS STREET, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ALYCIA BRICKLEY, WIFE/DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY AND BY MAKING KNOWN TO HER THE CONTENTS THEREOF.

NOW, JANUARY 15, 2004 @ 11:00 A.M. OC'CLOK SERVED ALYCIA D. BRICKLEY, DEFENDANT, AT HER RESIDENCE 410 NICHOLS STREET, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO ALYCIA BRICKLEY, DEFENDANT, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY AND BY MAKING KNOWN TO HER THE CONTENTS THEREOF.

**FILED**

NOW, MARCH 5, 2004 A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANTS. THE PROPERTY WAS SOLD TO THE PLAINTIFF FOR \$30,000.00 + COSTS.

MAY 17 2004  
6/11/2004  
William A. Shaw  
Prothonotary/Clerk of Courts  
81  
5.00

NOW, MAY 17, 2004 PAID COSTS FROM THE ADVANCE AND MADE A REFUND OF THE UNUSED ADVANCE TO THE ATTORNEY.

NOW, MAY 17, 2004 RETURN THE WRIT AS A SALE BEING HELD ON THE PROPERTY OF THE DEFENDANTS.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 15019

CENDANT MORTGAGE CORPORATION F/K/A COLDWELL BANKER MORT

VS.

BRICKLEY, ROBERT M.

WRIT OF EXECUTION

REAL ESTATE

**SHERIFF RETURNS**

---

THE PROPERTY WAS PURCHASED BY THE PLAINTIFF FOR \$30,000.00 + COSTS.

NOW, MAY 17, 2004 A DEED WAS FILED.

SHERIFF HAWKINS \$808.44  
SURCHARGE \$40.00  
PAID BY THE ATTORNEY

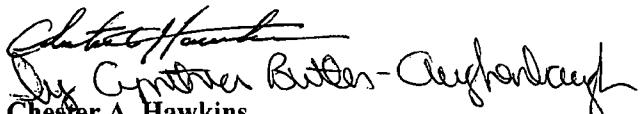
---

Sworn to Before Me This

17 Day Of MAY 2004



So Answers,

  
Chester A. Hawkins  
Sheriff

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

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

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION

vs.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA

NO.: 2003-1486-CD

WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

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

Premises: **410 NICHOLS STREET, CLEARFIELD, PA 16830**

(See legal description attached.)

|   |  |
|---|--|
| Amount Due  | <u>\$49,841.00</u>   |
| Interest from 11/17/03 to<br>Date of Sale (\$8.19 per diem) | \$ _____   |
| Total   | \$ _____ Plus costs as endorsed.<br><u>125.00 Prothonotary Costs</u> |

Willie Sharpe  
Prothonotary, Common Pleas Court of  
Clearfield County, Pennsylvania

Dated 11/18/03  
(SEAL)

By:

*Deputy*

MLD

Received November 18, 2003 @ 3:30 P.M.  
Chester A. Hawthins  
By Cynthia Bitten-Aughenbaugh

No. 2003-1486-CD

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

**CENDANT MORTGAGE CORPORATION, F/K/A COLDWELL BANKER  
MORTGAGE CORPORATION**

vs.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

**WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

Mark Friedman  
Attorney for Plaintiff

Address: 410 NICHOLS STREET, CLEARFIELD, PA 16830  
410 NICHOLS STREET, CLEARFIELD, PA 16830  
Where papers may be served.

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

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

---

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION

---

vs.

---

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

---

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA

NO.: 2003-1486-CD

WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

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

Premises: **410 NICHOLS STREET, CLEARFIELD, PA 16830**

(See legal description attached.)

|   |   |
|---|---|
| Amount Due  | <u>\$49,841.00</u>  |
| Interest from 11/17/03 to<br>Date of Sale (\$8.19 per diem) | <u>\$</u> _____   |
| Total   | <u>\$</u> _____ Plus costs as endorsed.<br><i>125.00 Prothonotary Costs</i> |

Willie Sharpe  
Prothonotary, Common Pleas Court of  
Clearfield County, Pennsylvania

By:

Dated 11/18/03  
(SEAL)

Deputy

MLD

Received November 18, 2003 @ 3:30 P.M.  
Chester A. Hawkins  
By Cynthia Bitten-Augenthaler

No. 2003-1486-CD

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

**CENDANT MORTGAGE CORPORATION, F/K/A COLDWELL BANKER  
MORTGAGE CORPORATION**

vs.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

**WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

|   |               |
|---|---------------|
| Real Debt   | \$49,841.00   |
| Int. from 11/17/03<br>to Date of Sale (\$8.19 per diem) |               |
| Costs   |               |
| Prothy. Pd.   | <u>125.00</u> |
| Sheriff   |               |

Mark Friedman  
Attorney for Plaintiff

Address: 410 NICHOLS STREET, CLEARFIELD, PA 16830  
410 NICHOLS STREET, CLEARFIELD, PA 16830  
Where papers may be served

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

ALL THAT CERTAIN lot situate in the Borough of Clearfield, Clearfield County, Pennsylvania, bounded and described as follows:

ON the North by Nichols Street and on the East by Eastern half of Lot No. 142; of lands now or formerly of Carl Pizzella on the South by an alley and on the West by Lot No. 143; of lands now or formerly of Margaret Haney being twenty-five (25) feet on front of Nichols Street and extending in depth one hundred eighty (180) feet, more or less, to an alley. Being No. 410 Nichols Street, Clearfield, Pennsylvania. Consisting of a two story tile house with seven rooms and bath, together with all structure, appurtenances, buildings and improvements.

Tax Parcel #43-K08-208-46

TITLE TO SAID PREMISES IS VESTED IN Robert M. Brickley and Alycia D. Brickley, husband and wife by Deed from Brent M. Snyder and Helena J. Snyder, husband and wife dated 6/25/2001 and recorded 6/26/2001, in Instrument #200109795.

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME      BRICKLEY      NO.      03-1486-CD

NOW,      March 5, 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      5TH      day of      MARCH      2004, I exposed the within described real estate of      ROBERT M. BRICKLEY AND ALYCIA D. BRICKLEY to public venue or outcry at which time and place I sold the same to      CENDANT MORTGAGE CORPORATION, F/K/A COLDWELL BANKER MORTGAGE CORPORATION he/she being the highest bidder, for the sum of      \$30,000.00 + COSTS      and made the following appropriations, viz:

**SHERIFF COSTS:**

|                            |               |
|----------------------------|---------------|
| RDR                        | 15.00         |
| SERVICE                    | 15.00         |
| MILEAGE                    | 2.00          |
| LEVY                       | 15.00         |
| MILEAGE                    | 2.00          |
| POSTING                    | 15.00         |
| CSDS                       | 10.00         |
| COMMISSION 2%              | 600.00        |
| POSTAGE                    | 4.44          |
| HANDBILLS                  | 15.00         |
| DISTRIBUTION               | 25.00         |
| ADVERTISING                | 15.00         |
| ADD'L SERVICE              | 15.00         |
| DEED                       | 30.00         |
| ADD'L POSTING              |               |
| ADD'L MILEAGE              |               |
| ADD'L LEVY                 |               |
| BID AMOUNT                 | 30,000.00     |
| RETURNS/DEPUTIZE           |               |
| COPIES/BILLING             | 15.00         |
|                            | 5.00          |
| BILLING/PHONE/FAX          | 10.00         |
| <b>TOTAL SHERIFF COSTS</b> | <b>808.44</b> |

**DEED COSTS:**

|                         |              |
|-------------------------|--------------|
| ACKNOWLEDGEMENT         | 5.00         |
| REGISTER & RECORDER     | 29.00        |
| TRANSFER TAX 2%         |              |
| <b>TOTAL DEED COSTS</b> | <b>29.00</b> |

**PLAINTIFF COSTS, DEBT & INTEREST:**

|                                  |                  |
|----------------------------------|------------------|
| DEBT-AMOUNT DUE                  | 49,841.00        |
| INTEREST FROM 11/17/03           |                  |
| 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>49,841.00</b> |
| <b>COSTS:</b>                    |                  |
| ADVERTISING                      | 297.66           |
| TAXES - collector                | TO 7/2           |
| TAXES - tax claim                | NONE             |
| DUE                              |                  |
| LIEN SEARCH                      | 100.00           |
| ACKNOWLEDGEMENT                  | 5.00             |
| DEED COSTS                       | 29.50            |
| SHERIFF COSTS                    | 808.44           |
| LEGAL JOURNAL AD                 | 144.00           |
| PROTHONOTARY                     | 125.00           |
| MORTGAGE SEARCH                  | 40.00            |
| MUNICIPAL LIEN                   |                  |
| <b>TOTAL COSTS</b>               | <b>1,887.60</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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION  
4001 LEADENHALL ROAD  
MOUNT LAUREL, NJ 08054

No.: 2003-1486-CD

vs.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY  
410 NICHOLS STREET  
CLEARFIELD, PA 16830

FILED

NOV 18 2003

William A. Shaw  
Prothonotary/Clerk of Courts

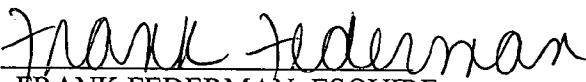
**PRAECIPE FOR IN REM JUDGMENT FOR FAILURE TO  
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE PROTHONOTARY:

Kindly enter an in rem judgment in favor of the Plaintiff and against ROBERT M. BRICKLEY and ALYCIA D. BRICKLEY, Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

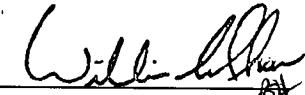
|                                |                    |
|--------------------------------|--------------------|
| As set forth in Complaint      | \$49,388.84        |
| Interest (10/1/03 to 11/17/03) | <u>452.16</u>      |
| <b>TOTAL</b>                   | <b>\$49,841.00</b> |

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

  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

Damages are hereby assessed as indicated.

DATE: November 17, 2003

  
PRO PROTHY

MLD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION

No.: 2003-1486-CD

Plaintiff

vs.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

Defendant(s)

Notice is given that a Judgment in the above captioned matter has been entered  
against you on November 18, 2006.

By: William L. Shanahan DEPUTY

If you have any questions concerning this matter please contact:

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

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

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

ATTORNEY FOR PLAINTIFF

CENDANT MORTGAGE CORPORATION, F/K/A : COURT OF COMMON PLEAS  
COLDWELL BANKER MORTGAGE CORPORATION Plaintiff : CIVIL DIVISION  
  
Vs. : CLEARFIELD COUNTY  
  
ROBERT M. BRICKLEY : NO. 2003-1486-CD  
ALYCIA D. BRICKLEY  
Defendants

TO: ROBERT M. BRICKLEY  
410 NICHOLS STREET  
CLEARFIELD, PA 16830

DATE OF NOTICE: NOVEMBER 4, 2003

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

#### IMPORTANT NOTICE

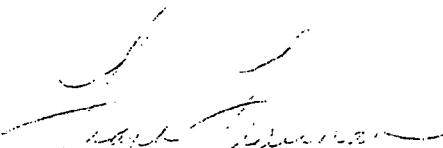
YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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

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

FILE COPY

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

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

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION

CLEARFIELD COUNTY

No.: 2003-1486-CD

vs.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY

**VERIFICATION OF NON-MILITARY SERVICE**

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

- (a) that the defendant(s) is/are not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of Congress of 1940, as amended.
- (b) that defendant, ROBERT M. BRICKLEY, is over 18 years of age, and resides at 410 NICHOLS STREET, CLEARFIELD, PA 16830 .
- (c) that defendant, ALYCIA D. BRICKLEY, is over 18 years of age, and resides at 410 NICHOLS STREET, CLEARFIELD, PA 16830.

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

  
FRANK FEDERMAN, ESQUIRE

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

COPY

Cendant Mortgage Corporation  
Plaintiff(s)

No.: 2003-01486-CD

Real Debt: \$49,841.00

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Robert M. Brickley  
Alycia D. Brickley  
Defendant(s)

Entry: \$20.00

Instrument: Statement of Judgment

Date of Entry: November 18, 2003

Expires: November 18, 2008

Certified from the record this 18th 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

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

ATTORNEY FOR PLAINTIFF

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE  
CORPORATION  
4001 LEADENHALL ROAD  
MOUNT LAUREL, NJ 08054

COURT OF COMMON PLEAS  
CIVIL DIVISION

COURT OF COMMON PLEAS  
CIVIL DIVISION

TERM 2003-1486-CV

Plaintiff

NO.

v.

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY  
410 NICHOLS STREET  
CLEARFIELD, PA 16830

CLEARFIELD COUNTY

Defendant(s)

CIVIL ACTION - LAW  
COMPLAINT IN MORTGAGE FORECLOSURE

NOTICE

FILED

OCT 03 2003

m/11:40 AM  
William A. Shaw  
Prothonotary/Clerk of Courts

2 CENS TO FILER

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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

CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
(814) 765-2641 EXT. 5982

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

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

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

1. Plaintiff is

CENDANT MORTGAGE CORPORATION,  
F/K/A COLDWELL BANKER MORTGAGE CORPORATION  
4001 LEADENHALL ROAD  
MOUNT LAUREL, NJ 08054

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

ROBERT M. BRICKLEY  
ALYCIA D. BRICKLEY  
410 NICHOLS STREET  
CLEARFIELD, PA 16830

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

3. On 06/26/01 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Book No. Instrument 200109796.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 04/01/2003 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

|                               |                     |
|-------------------------------|---------------------|
| Principal Balance             | \$45,208.77         |
| Interest                      | 2,025.30            |
| 03/01/2003 through 10/01/2003 |                     |
| (Per Diem \$9.42)             |                     |
| Attorney's Fees               | 1,250.00            |
| Cumulative Late Charges       | 176.88              |
| 06/26/2001 to 10/01/2003      |                     |
| Cost of Suit and Title Search | \$ 550.00           |
| Subtotal                      | \$ 49,210.95        |
| Escrow                        |                     |
| Credit                        | 0.00                |
| Deficit                       | 177.89              |
| Subtotal                      | <u>\$ 177.89</u>    |
| <b>TOTAL</b>                  | <b>\$ 49,388.84</b> |

7. The attorney's fees set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 49,388.84, together with interest from 10/01/2003 at the rate of \$9.42 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

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

ALL THAT CERTAIN LOT SITUATE IN THE BOROUGH OF CLEARFIELD,  
CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS  
FOLLOWS:

ON THE NORTH BY NICHOLS STREET AND ON THE EAST BY EASTERN HALF OF  
LOT NO. 142; OF LANDS NOW OR FORMERLY OF CARL PIZZELIA ON THE  
SOUTH BY AN ALLEY, AND ON THE WEST BY LOT NO. 143; OF LANDS NOW  
OR FORMERLY OF MARGARET HANEY BEING TWENTY-FIVE (25) FEET ON  
FRONT OF NICHOLS STREET AND EXTENDING IN DEPTH ONE HUNDRED EIGHTY  
(180) FEET, MORE OR LESS, TO AN ALLEY, BEING NO. 410 NICHOLS  
STREET, CLEARFIELD, PENNSYLVANIA. CONSISTING OF A TWO STORY TILE  
HOUSE WITH SEVEN ROOMS AND BATH, TOGETHER WITH ALL STRUCTURE,  
APPURTENANCES, BUILDINGS AND IMPROVEMENTS.

VERIFICATION

MARC J. HINKLE hereby states that he is V.P. of CENDANT MORTGAGE CORPORATION 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.

Mark Hinkle

DATE: 09/26/03