

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

Sheriff Docket # 14631

VS.

03-1486-CD

BRICKLEY, ROBERT M. & ALYCIA D.

COMPLAINT IN MORTGAGE FORECLOSURE

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 Harris
Chester A. Hawkins
Sheriff

FILED

OCT 14 2003
01:11:45 a.m.
William A. Shaw
Prothonotary
no cc

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 CORPORATION No.: 2003-1486-CD

vs.

ROBERT M. BRICKLEY
ALYCIA D. BRICKLEY

FILED No
cc
m/10:55:01
FEB 11 2004 *[Signature]*

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 Praecipe 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.

[Signature]
FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

CLEARFIELD COUNTY

CENDANT MORTGAGE CORPORATION,
F/K/A COLDWELL BANKER MORTGAGE CORPORATION 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 Praecipe 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
230 East Market Street
Clearfield, PA 16830

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

Name

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

Commonwealth of Pennsylvania
Department of Welfare

PO Box 2675
Harrisburg, PA 17105

Tenant/Occupant

410 NICHOLS STREET
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.

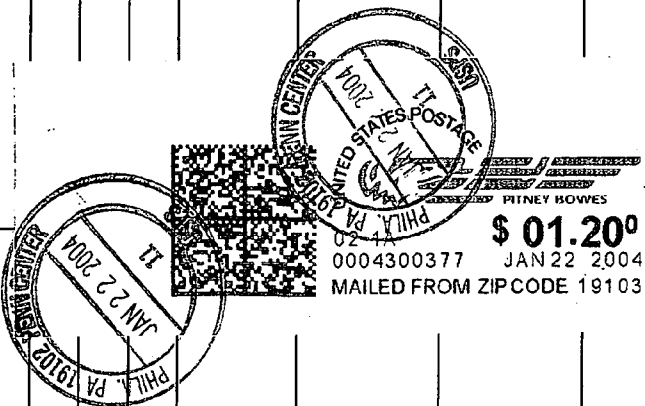

FRANK FEDERMAN, ESQUIRE
Attorney for Plaintiff

November 13, 2003

Name and Address Of Sender

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

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



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 2nd 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

\$49,841.00

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

and Costs.

125.00 Prothonotary costs

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

vs.

ROBERT M. BRICKLEY
ALYCIA D. BRICKLEY

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Frank Adelman
Attorney for Plaintiff(s)

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

Prothonotary/Clerk of Courts

William A. Shaw

Atty pd. 20.00

NOV 18 2003

FILED

rec & warrants to help property descr.

Shif

FILED

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.

CLEARFIELD COUNTY

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

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 Praecipe 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, ESQUIRE
Attorney for Plaintiff

November 13, 2003

CLEARFIELD COUNTY

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

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 Praecipe 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
230 East Market Street
Clearfield, PA 16830

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

Name

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

Commonwealth of Pennsylvania
Department of Welfare

PO Box 2675
Harrisburg, PA 17105

Tenant/Occupant

410 NICHOLS STREET
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.

**WRIT OF EXECUTION
(MORTGAGE FORECLOSURE)**

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

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

\$49,841.00

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

\$ _____

Total

\$ _____ Plus costs as endorsed.

125.00 Prothonotary costs

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


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.

03-1486-10

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.**

**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.**

**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.**

FILED

MAY 17 2004

William A. Shaw

Prothonotary/Clerk of Courts

87
5.00

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

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

\$49,841.00

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

\$ _____

Total

\$ _____ Plus costs as endorsed.
125.00 Prothonotary Costs

William J. Haines
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. Kauter
By Cynthia Bitter-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)**

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


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**

**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

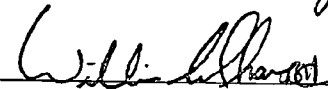
\$49,841.00

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

\$ _____

Total

\$ _____ Plus costs as endorsed.
125.00 Prothonotary Costs


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. Hawkins
By Cynthia Bitter-Aughenbaugh

No. 2003-1486-CD

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

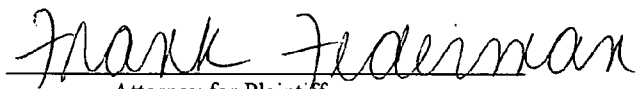
CENDANT MORTGAGE CORPORATION, F/K/A COLDWELL BANKER
MORTGAGE CORPORATION

vs.

ROBERT M. BRICKLEY
ALYCIA D. BRICKLEY

**WRIT OF EXECUTION
(MORTGAGE FORECLOSURE)**

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


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
TOTAL SHERIFF COSTS	808.44

DEED COSTS:

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	29.00
TRANSFER TAX 2%	
TOTAL DEED COSTS	29.00

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	
TOTAL DEBT & INTEREST	49,841.00

COSTS:

ADVERTISING	297.66
TAXES - collector TO 7/2	338.00
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	

TOTAL COSTS 1,887.60

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>

TOTAL	\$49,841.00
--------------	--------------------

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: Willi L. Han 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
COLDWELL BANKER MORTGAGE CORPORATION
Plaintiff

: COURT OF COMMON PLEAS

: CIVIL DIVISION

Vs.

: CLEARFIELD COUNTY

ROBERT M. BRICKLEY
ALYCIA D. BRICKLEY

: NO. 2003-1486-CD

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

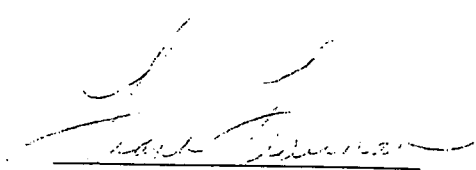
YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT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

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

Plaintiff

v.

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

Defendant(s)

CIVIL ACTION - LAW
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 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

ATTORNEY FOR PLAINTIFF
COURT OF COMMON PLEAS
CIVIL DIVISION

COURT OF COMMON PLEAS
CIVIL DIVISION

TERM 2003-1486-CV

NO.

CLEARFIELD COUNTY

FILED

OCT 03 2003

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

2 COPY TO SHAW

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	<u>\$ 550.00</u>
Subtotal	\$ 49,210.95
Escrow	
Credit	0.00
Deficit	177.89
Subtotal	<u>\$ 177.89</u>
TOTAL	\$ 49,388.84

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
/s/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 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.

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.

_____

DATE: _____

