

03-1487-CD
WELLS FAR GO HOME MORTGAGE, INC. vs. BRENT CODER

Federman and Phelan, LLP
By: Francis S. Hallinan, Esquire
Identification No. 62695
One Penn Center Plaza
Suite 1400
Philadelphia, PA 19103
(215) 563-7000

Attorney for Plaintiff

Wells Fargo Home Mortgage, Inc.
3476 Stateview Boulevard
Fort Mill, SC 29715

: Court of Common Pleas

: Civil Division

v.

: Clearfield County

: Term 2003-1487-CD

Brent Coder
Or Occupants
115 Wayne Road
Dubois, PA 15801

: No.

:

CIVIL ACTION - EJECTMENT

****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 and this debt was not reaffirmed, this correspondence is not and should not be construed to be an attempt to collect a debt, but only enforcement of a lien against property.****

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 (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 and 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. 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

FILED

OCT 03 2003

W/11:55
William A. Shaw

Prothonotary/Clerk of Courts

1 CENT TO STATE

1. Plaintiff is Wells Frago Home Mortgage, Inc.
2. Defendant is Brent Coder Or Occupants.
3. Plaintiff is equitable owner of premises located at 115 Wayne Road, Dubois, PA 15801, a legal description of which is attached.
4. Plaintiff became owner of said premises as a result of foreclosure and judicial sale by the Sheriff of Clearfield County, on September 5, 2003.
5. Plaintiff, by virtue of the above, is the equitable owner of said premises, and is entitled to possession thereof. The defendant is occupying the said premises without right and so far as the plaintiff is informed, without claim of title.
6. Plaintiff has demanded possession of the said premises from the said defendant who has refused to deliver up possession of same.

WHEREFORE, plaintiff seeks to recover possession of said premises.



Francis S. Hallinan, Esquire
Attorney for Plaintiff

Premises: 115 WAYNE ROAD, TOWNSHIP OF SANDY
CLEARFIELD COUNTY
PA

Based upon the examination of evidence in the appropriate public records, Company certifies that the premises endorsed hereon are subject to the liens, encumbrances and exceptions to title hereinafter set forth. This Certificate does not constitute title insurance; liability hereunder is assumed by the Company solely in its capacity as an abstractor for its negligence, mistakes or omissions in a sum not to exceed Two Thousand Dollars.

DESCRIPTION

ALL THAT CERTAIN messuage or piece of land situate and being in Sandy Township, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the Southwest corner of Lot No. 2 in the E.F. Hand Plan of Lots in Sandy Township; thence North 60 degrees West, 70 feet to a point on a street or alley; thence along said street or alley, North 30 degrees 15 minutes East, 200 feet to a point on the Southerly side of Wayne Road, also being a public road leading from DuBois to Reynoldsville; thence along said road, South 60 degrees East, 70 feet to a point at the Westerly line of said Lot No. 2; which lot is now or formerly owned by Jack E. and Kay Guthridge, South 30 degrees 15 minutes West, 200 feet to the place of beginning. Being known as Lot No. 3 in the E.F. Hand Plan of Lots of Sandy Township, Clearfield County, Pennsylvania.

TAX PARCEL #128.0-B04-438-00024

VERIFICATION

MARK WOOTON Hereby states that he/ she is the is the
V.P. LOAN DOCS Of Wells Fargo Home Loan Mortgage Corporation
Mortgage servicing agent for the Plaintiff in this matter, that he/she is authorized to take
this Verification, and that the statements made in the foregoing Civil Action in Ejectment
are true and correct to the best of his /her 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: 9/30/03

MARK WOOTON
VICE PRESIDENT LOAN DOCUMENTATION

In The Court of Common Pleas of Clearfield County, Pennsylvania

WELLS FARGO HOMES MORTGAGE INC.

VS.

CODER, BRENT

COMPLAINT IN EJECTMENT

Sheriff Docket #

14629

03-1487-CD

SHERIFF RETURNS

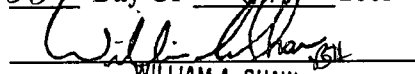
NOW OCTOBER 17, 2003 AT 1:00 PM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON BRENT CODER, DEFENDANT AT RESIDENCE, 115 WAYNE ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BRENT CODER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HIM THE CONTENTS THEREOF.
SERVED BY: MCCLEARY/NEVLING

Return Costs

Cost	Description
59.04	SHERIFF HAWKINS PAID BY: ATTY
10.00	SURCHARGE PAID BY: ATTY

Sworn to Before Me This

22nd Day Of Oct 2003



WILLIAM A. SHAW
Prothonotary

My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA


So Answers,



Chester A. Hawkins
Sheriff

FILED

0/3:15:20
OCT 22 2003

 William A. Shaw
Prothonotary/Clerk of Courts

Wells Fargo v Brent Coder
marcy checking

FAX 215-563-4491

Clearfield, PA 16830
Phone: 814-765-2641, Ext. 1330
Fax: 814-765-7659

**Clearfield County
Courthouse**

Fax

To: *Nicole* **From:** William A. Shaw
Fax: *215-563-4491* **Date:** *12-1-03*
Phone: **Pages:** *3 + Copies*
Re: *03-1487-(1)* **CC:**

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

•Comments:

Federman & Phelan

Please remit

December 1, 2002

Remit to: Clearfield County Prothonotary, PO Box 549, Clearfield, PA 16830

Please remit \$5.00 for 1 fax in the above listed case at your earliest convenience.

Thank You.

NOV 14, 2003

WELLS Fargo Home Mortgage INC
Plaintiff

VS.

Brent Coder
Defendants

COURT OF Common Pleas
Civil Division
Clearfield CTY

NO: 2003-1487

OBJECTION

The following ATTACHED SHEET IS A WRITTEN
Statement. TO object to the claims SET forth AGAINST
US.

WE ARE ASKING for a reconsideration hearing
ON THIS MATTER. SEE ATTACHED

Thank you

Melanie K Coder

115 Wayne RD

DuBois PA 15801

(814) 372-2030 - PHONE

FILED

NOV 14 2003

W. A. Shaw
William A. Shaw

Prothonotary/Clerk of Courts

1 copy to DEF.



CLEARFIELD COUNTY COURT HOUSE
& Common Pleas Civil Division:

I Brent & Melanie Coder am Requesting a Hearing in this matter of Wells Fargo Home Mortgage INC. VS. Brent Coder. NO 2003-1487. AT THIS TIME I ask that all action be stopped until a hearing date can be set.

AT THIS TIME I feel we should be eligible for a stay of conveyance in my home & should be aloud to pay rent. My objections are as follows

ON NOV 7, 2003 Brent was hospitalized with a heart condition & found he is a diabetic AND ALSO has liver problems.

Melanie is at this time INCARCERATED & ON WORK release sending money home to pay bills & would be able to help pay rent.

AT THIS TIME A move would be extremely stress full ON Brent & family to have to move. WE are willing to rent the home. Until Melanies release date in Early Spring.

Another objection to this matter is Mid Penn Legal Services have been contacted upon many occasions & have not followed thru with any help on this matter.

Also all correspondence for Wells Fargo have been through a Debt Collection Agency / Attorney. We were recently discharged of all debt through Bankruptcy there for this should not be ~~an attempt~~ an attempt to collect a debt, but to enforce a Lien against property.

It is at this time we are filing this motion ourselves to try & keep our RESIDENT UNTILL it would be an appropriate time to move.

Thank you, Please Contact us ASAP.
(814) 372-2030

Brend P. Coder
Melanie K Coder

11-13-03

*** TRANSMISSION REPORT ***

Dec. 2 '03 15:28

DATE	START	TIME	PARTNER	MODE	PAGE	RESULT
Dec. 2	15:25	2'10	12155634491	G3	04	OK

NOV 14, 2003.

GA

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Plaintiff

VS.

Brent Coder
Defendants

COURT OF Common Pleas
Civil Division
Clearfield CTY

NO: 2003-1487

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Melanie K Coder

115 Wayne RD

DuBois PA 15801

(814) 372-2030 - PHONE

FILED

NOV 14 2003

W. A. Shaw
William A. Shaw

Prothonotary/Clerk of Courts

1 copy to DEPT.

GA

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& Common Pleas Civil Division:

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Thank you, Please Contact us ASAP.
(814) 372-2030

Brent P. Coder
Melanie K Coder
11-13-03

FILED

APR 01 2004

William A. Shaw
Prothonotary/Clerk of Courts

FEDERMAN AND PHELAN, LLP
By: NOELLE A. CONNOR, ESQUIRE
Identification No. 83130
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

Wells Fargo Home Mortgage, Inc.
3476 Stateview Boulevard
Fort Mill, SC 29715

vs.

Brent Coder
Or Occupants
115 Wayne Road
Dubois, PA 15801

Attorney for Plaintiff

: Court of Common Pleas

: Civil Division

: Clearfield County

: No. 2003-1487

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

MOTION FOR SUMMARY JUDGMENT

Plaintiff, Wells Fargo Home Mortgage, Inc. (hereinafter "Plaintiff"), by its attorney, Noelle A. Connor, Esquire, respectfully requests that this Honorable Court enter an Order granting summary judgment in the above-captioned matter for the following reasons:

1. As the successful bidder at a Sheriff's Sale, Plaintiff became the owner of the premises located at 115 Wayne Road, Dubois, PA 15801, by a Deed from the Sheriff of Clearfield County. A true and correct copy of the Deed is attached hereto as Exhibit A.

2. Plaintiff notified the occupants to vacate the premises, but, to date, they have remained in the property. A true and correct copy of Plaintiff's notice to vacate is attached hereto as Exhibit B.

3. Because the occupants have refused to vacate the property on their own, Plaintiff filed an ejectment action on October 3, 2003. A true and correct copy of the Complaint is attached hereto as Exhibit C.

4. An Answer to the Complaint has been filed in which no defense has been raised. A true and correct copy of the Answer is attached hereto as Exhibit D.

5. Plaintiff respectfully submits that it has established its right to immediate, exclusive possession of the premises, and there are no material issues of fact in this case for a fact-finder.

6. Plaintiff incorporates herein its Brief in support of its Motion for Summary Judgment.

WHEREFORE, Plaintiff respectfully requests that Judgment for possession be entered as prayed for in the Complaint.

Respectfully submitted,
FEDERMAN AND PHELAN, LLP

Noelle A. Connor

Noelle A. Connor, Esquire
Attorney for Plaintiff

RECEIVED

APR 01 2004

COURT ADMINISTRATOR'S
OFFICE

FEDERMAN AND PHELAN, LLP
By: NOELLE A. CONNOR, ESQUIRE
Identification No. 83130
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Wells Fargo Home Mortgage, Inc.
3476 Stateview Boulevard
Fort Mill, SC 29715

Attorney for Plaintiff

: Court of Common Pleas

: Civil Division

: Clearfield County

: No. 2

vs.

Brent Coder
Or Occupants
115 Wayne Road
Dubois, PA 15801

Brief

**PLAINTIFF'S BRIEF IN SUPPORT
OF ITS MOTION FOR SUMMARY JUDGMENT**

I. PLAINTIFF HAS A RIGHT TO IMMEDIATE EXCLUSIVE POSSESSION

In order to prevail in an ejectment action, Plaintiff must establish a right to immediate, exclusive possession of the subject premises. Doman v. Brogan, 405 Pa.Super. 254, 263, 592 A.2d 104, 108 (1991). Hallman v. Turns, 334 Pa.Super. 184, 189, 482 A.2d 1284, 1287 (1984). Accordingly, Plaintiff bears the burden of proving prima facie title to the property in question. Id. Pennsylvania Rule of Civil Procedure 1054(b) provides that in an ejectment action, a party must set forth the abstract of title upon which he relies in order to recover possession, unless superior title is shown by the adverse party.

Pennsylvania law states that one who purchases real property at a sheriff's sale acquires an equitable interest. Walker v. PNC Bank, 2002 WL 31098417 (3rd Cir.). The purchaser acquires an equitable interest which becomes complete title upon complying with the terms of sale. Pennsylvania Company for Insurances v. Broad Street Hosp., 354 Pa. 123, 128, 47 A.2d 281, 283 (1946). The bona fide purchaser instantly acquires a vested right to property sold at a public sale of land at the moment it is knocked off to him if he complies in all respects with the conditions of sale. Id. at 129, 47 A.2d at 284.

In the present case, Plaintiff has presented a Sheriff's Deed, which demonstrates its ownership of the property in question. In contrast, no evidence has been presented challenging Plaintiff's title.

II. PLAINTIFF HAS DEMANDED POSSESSION

Attached as Exhibit B is a letter from Francis S. Hallinan, Esquire, counsel for Plaintiff, advising the occupants of Plaintiff's ownership and directing them to vacate the premises and deliver up possession of same. Prior to the filing of this Motion, the occupants have had ample opportunity to peacefully vacate the premises on their own, but have failed to do so.

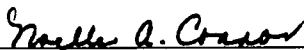
III. CONCLUSION

The purpose of the summary judgment procedure is to prevent vexation and delay, improve the machinery of justice, promote the expeditious disposition of cases and avoid unnecessary trials when no genuine issue of material fact is raised. Thompson v. Nason, 379 Pa.Super. 115, 535 A.2d 1177 (1988), affirmed, 527 Pa.330, 591 A.2d 703 (1991). In making its determination to grant summary judgment, the Court must accept as true all properly pleaded facts, as well as all reasonable inferences which might be drawn therefrom. *Id.*

Plaintiff requests that its motion be granted so that it can gain possession of its premises and recover the unjust financial losses it has incurred. Due to the occupants' failure to peacefully vacate the premises, Plaintiff requires the aid of this Court to gain rightful possession of its premises.

WHEREFORE, Plaintiff respectfully requests that Judgment for possession be entered as prayed for in the Complaint.

Respectfully submitted,
FEDERMAN AND PHELAN, LLP



Noelle A. Connor, Esquire
Attorney for Plaintiff

EXHIBIT A

CLEARFIELD COUNTY RECORDER OF DEEDS

Karen L. Starck, Recorder
Maurene Inlow - Chief Deputy

P.O. Box 361
1 North Second Street, Suite 103
Clearfield, Pennsylvania 16830

AMDAVIT No: 37242

***RETURN DOCUMENT TO:**
CLEARFIELD CO SHERIFF

Instrument Number - 200402234

Recorded On 2/12/2004 At 2:06:54 PM

* Instrument Type - DEED

* Total Pages - 5

Invoice Number - 105720

* Grantor - CLEARFIELD CO SHERIFF

* Grantee - WELLS FARGO HOME MORTGAGE INC

* Customer - CLEARFIELD CO SHERIFF

*** FEES**

RECORDING FEES -	\$13.50
RECORDER	
COUNTY IMPROVEMENT FUND	\$2.00
RECORDER IMPROVEMENT	\$3.00
FUND	
JCS/ACCESS TO JUSTICE	\$10.00
STATE WRIT TAX	\$0.50
TOTAL	\$29.00

I hereby CERTIFY that this document
is recorded in the Recorder's Office of
Clearfield County, Pennsylvania.



Karen L. Starck

Karen L. Starck
Recorder of Deeds

THIS IS A CERTIFICATION PAGE

Do Not Detach

THIS PAGE IS NOW PART OF THIS LEGAL DOCUMENT

* - Information denoted by an asterisk may change during the verification process and may not be reflected on this page.

Know all Men by these Presents,

That I, **Chester A. Hawkins**, High Sheriff of the County of Clearfield, in the State of Pennsylvania, for and in consideration of the sum of \$1.00 plus costs

, to me in hand, do hereby grant and convey to
WELLS FARGO HOME MORTGAGE, INC. F/K/A NORWEST MORTGAGE, INC.

the following described property, to wit:

ALL THAT CERTAIN messuage or piece of land situate and being in Sandy Township, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the Southwest corner of Lot No. 2 in the E.F. Hand Plan of Lots in Sandy Township; thence North 60 degrees West, 70 feet to a point on a street or alley; thence along said street or alley, North 30 degrees 15 minutes East, 200 feet to a point on the Southerly side of Wayne Road, also being a public road leading from DuBois to Reynoldsville; thence along said road, South 60 degrees East, 70 feet to a point at the Westerly line of said Lot No. 2; which lot is now or formerly owned by Jack E. and Kay Guthridge, South 30 degrees 15 minutes West, 200 feet to the place of beginning. Being known as Lot No. 3 in the E.F. Hand Plan of Lots of Sandy Township, Clearfield County, Pennsylvania.

TAX PARCEL #128.0-B04-438-00024

TITLE TO SAID PREMISES IS VESTED IN Brent P. Coder and Melanie K. Coder, husband and wife by Deed from Gavin B. Chafin and Jane D. Chafin, husband and wife dated 10/22/1996, recorded 10/25/1996, in Record Book 1798, Page 47.

SEIZED, taken in execution and sold as the property of BRENT P. CODER AND MELANIE K. CODER, at the suit of WELLS FARGO HOME MORTGAGE, INC. F/K/A NORWEST MORTGAGE, INC. JUDGMENT NO. 02-1964-CD.

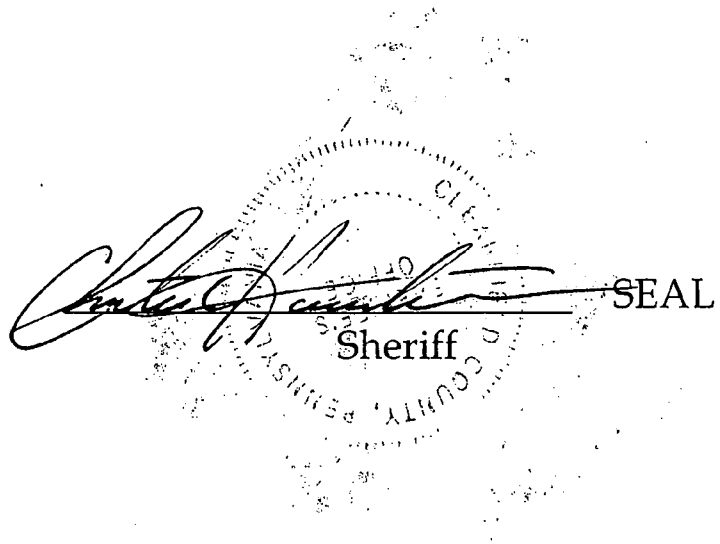
Now, FEBRUARY 12, 2004 the same having been sold by me to the said grantee on the 5TH day of SEPTEMBER Anno Domini two thousand and three after due advertisement according to law, under and by virtue of writ of execution issued on the 21ST day of MAY Anno Domini two thousand and three out of the Court of Common Pleas of said County of Clearfield as of case number 02-1964-CD at the suit of

WELLS FARGO HOME MORTGAGE, INC. F/K/A NORWEST
MORTGAGE, INC.

against

BRENT P. CODER AND MELANIE K. CODER

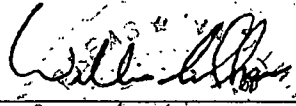
IN WITNESS WHEREOF, I have hereunto affixed my signature this 12TH day of FEBRUARY Anno Domini Two thousand and four.



State of Pennsylvania
County of Clearfield

On 12TH day of FEBRUARY , 2004, before me a Prothonotary, the undersigned officer personally appeared, **Chester A. Hawkins**, High Sheriff of the State of Pennsylvania known to me (or satisfactory proven) to be the person described in the foregoing instrument, and acknowledged that he executed the same in the capacity thereinstated and for the purposes therein contained.

In witness whereof, I have hereunto set my hand and official seal.



Prothonotary, Title of Officer

Deputy Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

CERTIFICATE OF RESIDENCE

"I hereby Certify that the precise Residence of the Grantee or Grantees is,



Sheriff of Clearfield County

WELLS FARGO HOME MORTGAGE, INC. F/K/A NORWEST
MORTGAGE, INC.
5024 PARKWAY PLAZA BOULEVARD
CHARLOTTE, NC 28217

Deed - Poll.

No.

Chester A. Hawkins
High Sheriff of Clearfield County

TO

WELLS FARGO HOME MORTGAGE, INC. F/K/A NORWEST MORTGAGE, INC.

5024 PARKWAY PLAZA BOULEVARD

CHARLOTTE, NC 28217

SHERIFF DEED

Dated FEBRUARY 12, 2004

For \$1.00 + COSTS

Sold as the property of

BRENT P. CODER AND MELANIE K. CODER

Sold on 02-1964-CD

EXHIBIT B

Federman and Phelan, LLP
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Fax # (215) 563-5534

October 1, 2003

Brent Coder
Or Occupants
115 Wayne Road
Dubois, PA 15801

RE: 115 Wayne Road
Dubois, PA 15801

Dear Occupant:

We represent Wells Frago Home Mortgage, Inc., which became equitable owner of the above premises as a result of foreclosure and judicial sale by the Sheriff of the County of Clearfield on September 5, 2003.

You are now in possession of the premises without Authority or permission of our client and you must vacate immediately.

Unless you immediately vacate the premises and make them available for possession, court action will be taken against you at once.

Very truly yours,

FEDERMAN AND PHELAN

Francis S. Hallinan, Esquire

EXHIBIT C

OCT 03 2003

William A. Shaw
Prothonotary/Clerk of Courts

Federman and Phelan, LLP
By: Francis S. Hallinan, Esquire
Identification No. 62695
One Penn Center Plaza
Suite 1400
Philadelphia, PA 19103
(215) 563-7000

Attorney for Plaintiff

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Dubois, PA 15801

**FEDERMAN AND PHELAN
ATTORNEY FILE COPY
PLEASE RETURN**

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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. 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.

We hereby certify the
within to be a true and
correct copy of the
original filed of record
FEDERMAN AND PHELAN

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

**FEDERMAN AND PHELAN
ATTORNEY FILE COPY
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WHEREFORE, plaintiff seeks to recover possession of said premises.

Francis S. Hallinan, Esquire
Attorney for Plaintiff

Premises: 115 WAYNE ROAD, TOWNSHIP OF SANDY
CLEARFIELD COUNTY
PA

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TAX PARCEL #128.0-B04-438-00024

VERIFICATION

MARK WOOTON

Hereby states that he/ she is the is the

V.P. LOAN DOCS

Of

Wells Fargo Home Loan Mortgage Corporation

Mortgage servicing agent for the Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Ejectment are true and correct to the best of his /her 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:

9/30/03

MARK WOOTON
VICE PRESIDENT LOAN DOCUMENTATION

EXHIBIT D

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Plaintiff

VS.

Brent Coder
Defendants

COURT OF Common Pleas
Civil Division
Clearfield CTY

NO: 2003-1487

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115 Wayne RD
Dubois PA 15801
(814) 372-2030 -PHONE

FILED

NOV 14 2003

William A. Shaw
William A. Shaw

Prothonotary/Clerk of Courts

1 copy to DCA

[Signature]

CLEARFIELD COUNTY COURT HOUSE
& Common Pleas Civil Division:

I Brent & Melanie Coder am Requesting a Hearing in this matter of Wells Fargo Home Mortgage INC. VS. Brent Coder. NO 2003-1487. AT THIS time I ask that all action be stopped until a hearing date can be set.

AT THIS time I feel we should be eligible for a stay of Conveyance in my home & should be aloud to pay rent. My objections are as Follows

ON Nov 7. 2003 Brent was hospitalized with a heart condition & found he is a diabetic AND also has liver problems.

Melanie is at this time INCARCERATED & ON WORK release sending money home to pay bills & would be able to help pay rent.

AT THIS time a move would be extremely stress full ON Brent & family to have to move. WE are willing to rent the home. Until Melanie's release date in Early Spring.

Another objection to this matter is Mid Penn Legal Services have been contacted upon many occasions & have not followed thru with any help on this matter:

Also all correspondence for Wells Fargo have been through a DEBT Collection Agency / ATTORNEY. WE were recently discharged of all debt through Bankruptcy there for this should not be ~~an attempt~~ an attempt to collect a debt, but to enforce a Lien against property.

It is at this time we are filing this motion ourselves to try & keep our RESIDENT until it would be an appropriate time to move.

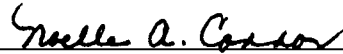
Thank you, Please Contact us ASAP.
(814) 372-2030

Brent P. Coder
Melanie K. Coder

11-13-03

VERIFICATION

Noelle A. Connor, Esquire, hereby states that she is the attorney for Plaintiff in this action, that she is authorized to make this verification, and that the statements made in the foregoing Motion for Summary Judgment and supporting Brief are true and correct to the best of her knowledge, information and belief. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, reading "Noelle A. Connor", written over a horizontal line.

Noelle A. Connor, Esquire
Attorney for Plaintiff

file name & #: coder, E6742826

FEDERMAN AND PHELAN, LLP
By: NOELLE A. CONNOR, ESQUIRE
Identification No. 83130
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Wells Fargo Home Mortgage, Inc.
3476 Stateview Boulevard
Fort Mill, SC 29715

vs.

Brent Coder
Or Occupants
115 Wayne Road
Dubois, PA 15801

Attorney for Plaintiff

: Court of Common Pleas
:
: Civil Division
:
: Clearfield County
:
: No. 2003-1487

CERTIFICATION OF SERVICE

I hereby certify true and correct copies of the foregoing Plaintiff's Motion for Summary Judgment and Supporting Brief were served by regular mail on Defendant at the address and on the date listed below:

Brent Coder, Pro Se
115 Wayne Road
Dubois, PA 15801

Melanie Coder
115 Wayne Road
Dubois, PA 15801

DATE: 3-30-04

Noelle A. Connor
Noelle A. Connor, Esquire
Attorney for Plaintiff

FILED

APR 01 2004

William A. Shaw
Prothonotary/Clerk of Courts

FEDERMAN AND PHELAN, LLP
By: NOELLE A. CONNOR, ESQUIRE
Identification No. 83130
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Wells Fargo Home Mortgage, Inc.
3476 Stateview Boulevard
Fort Mill, SC 29715

Attorney for Plaintiff

: Court of Common Pleas

: Civil Division

: Clearfield County

: No. 2003-1487

vs.

Brent Coder
Or Occupants
115 Wayne Road
Dubois, PA 15801

PRAECIPE TO INDEX MELANIE CODER AS A DEFENDANT

TO THE PROTHONOTARY:

Please index Melanie Coder as a Defendant in the above referenced case.

3-30-04
Date

Noelle A. Connor
Noelle A. Connor, Esquire
Attorney for Plaintiff

FILED

APR 01 2004

William A. Shaw
Prothonotary/Clerk of Courts

FEDERMAN AND PHELAN, LLP
By: NOELLE A. CONNOR, ESQUIRE
Identification No. 83130
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Wells Fargo Home Mortgage, Inc.
3476 Stateview Boulevard
Fort Mill, SC 29715

Attorney for Plaintiff

: Court of Common Pleas

: Civil Division

: Clearfield County

vs.

: No. 2003-1487

Brent Coder
Or Occupants
115 Wayne Road
Dubois, PA 15801

CERTIFICATION OF SERVICE

I hereby certify a true and correct copy of the foregoing Praecipe to Index Defendant was served by regular mail on Defendant on the date listed below:

Brent Coder, Pro Se
115 Wayne Road
Dubois, PA 15801

Melanie Coder
115 Wayne Road
Dubois, PA 15801

DATE: 3-30-04

Noelle A. Connor
Noelle A. Connor, Esquire
Attorney for Plaintiff

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

WELLS FARGO HOME
MORTGAGE, INC.

vs.

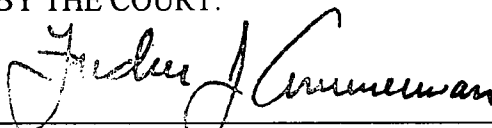
BRENT CODER

:
:
:
: No. 03-1487-CD
:
:

ORDER

NOW, this 8th day of April, 2004, upon consideration of Plaintiff's Motion for Summary Judgment, a Rule is hereby issued upon the Defendant to Appear and Show Cause why the Motion should not be granted. Argument is scheduled the 7 day of May, 2004, at 2:30 P.M. in Courtroom No. 1, Clearfield County Courthouse, Clearfield, PA.

BY THE COURT:


FREDRIC J. AMMERMAN
President Judge

FILED

APR 12 2004

William A. Shaw
Prothonotary/Clerk of Courts

FEDERMAN AND PHELAN, LLP
By: NOELLE A. CONNOR, ESQUIRE
Identification No. 83130
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Wells Fargo Home Mortgage, Inc.
3476 Stateview Boulevard
Fort Mill, SC 29715

vs.

Brent Coder
Or Occupants
115 Wayne Road
Dubois, PA 15801

Attorney for Plaintiff

: **Court of Common Pleas**
: **Civil Division**
: **Clearfield County**
: **No. 2003-1487**

CERTIFICATION OF SERVICE

I hereby certify a true and correct copy of the foregoing Order scheduling argument on Plaintiff's Motion for Summary Judgment was served via overnight mail on Defendants on the date listed below:

Brent Coder, Pro Se
Melanie K. Coder, Pro Se
115 Wayne Road
Dubois, PA 15801

DATE: 4.28.04

Noelle A. Connor
Noelle A. Connor, Esquire
Attorney for Plaintiff

FILED
MAY 03 2004
William A. Shaw
Prothonotary/Clerk of Courts

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

WELLS FARGO HOME
MORTGAGE, INC.

vs.

BRENT CODER

:
:
:
: No. 03-1487-CD
:
:

ORDER

NOW, this 8th day of April, 2004, upon consideration of Plaintiff's Motion for Summary Judgment, a Rule is hereby issued upon the Defendant to Appear and Show Cause why the Motion should not be granted. Argument is scheduled the 7 day of May, 2004, at 2:30 P.M. in Courtroom No. 1, Clearfield County Courthouse, Clearfield, PA.

BY THE COURT:

/s/ Fredric J. Ammerman

FREDRIC J. AMMERMAN
President Judge

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

APR 12 2004

Attest.

William B. Shaw
Prothonotary/
Clerk of Courts

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

WELLS FARGO HOME
MORTGAGE, INC.
Plaintiff

v.

BRENT CODER,
Defendant

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Docket No. 03-1487-CD

Type of Pleading:
PRAECIPE TO ENTER APPEARANCE

Filed on Behalf of:
Plaintiff:
WELLS FARGO HOME MORTGAGE, INC.

Counsel of Record for
This Party:

Dwight L. Koerber, Jr., Esquire
PA I.D. No. 16332

LAW OFFICES OF
DWIGHT L. KOERBER, JR.
110 N. Second Street
P.O. Box 1320
Clearfield, PA 16830
(814) 765-9611

FILED

MAY 07 2004

William A. Shaw
Prothonotary/Clerk of Courts

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

WELLS FARGO HOME
MORTGAGE, INC.,
Plaintiff

v.

BRENT CODER,
Defendant

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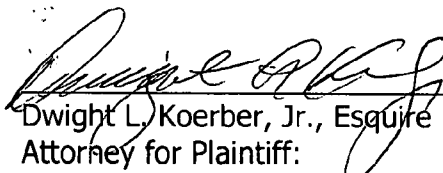
Docket No. 03-1487-CD

PREACIPE TO ENTER APPEARANCE

TO THE PROTHONOTARY:

Please enter my appearance on behalf of Plaintiff, Wells Fargo Home Mortgage,
Inc., in this proceeding.

Respectfully submitted,


Dwight L. Koerber, Jr., Esquire
Attorney for Plaintiff:
Wells Fargo Home Mortgage, Inc.

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

WELLS FARGO HOME
MORTGAGE, INC.,
Plaintiff

v.

BRENT CODER,
Defendant

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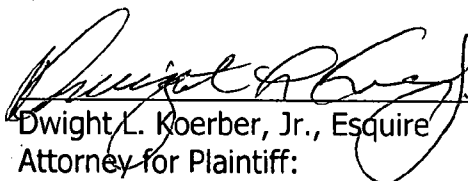
Docket No. 03-1487-CD

CERTIFICATE OF SERVICE

I certify that on the 7th day of May, 2004, the undersigned served certified copies of the Praecept to Enter Appearance in the above-captioned matter upon the following via United States First Class Mail.

Brent Coder or Occupant
115 Wayne Road
DuBois, PA 15801

Noelle A. Connor, Esquire
FEDERMAN AND PHELAN, LLP
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814



Dwight L. Koerber, Jr., Esquire
Attorney for Plaintiff:
Wells Fargo Home Mortgage, Inc.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET NO. 03-1487-CD

WELLS FARGO HOME MORTGAGE, INC.,
Plaintiff

v.

BRENT CODER,
Defendant

PRAECIPE TO ENTER APPEARANCE

FILED 4cc
8/10:37 AM
MAY 07 2004
William A. Shaw
Prothonotary/Clerk of Courts
AMC Koerber
copy to CIA

LAW OFFICE
DWIGHT KOERBER, JR.
ATTORNEY-AT-LAW
110 NORTH SECOND STREET
P. O. BOX 1320
CLEARFIELD, PENNSYLVANIA 16830

Date: 05/27/2004

Clearfield County Court of Common Pleas

User: DGREGG

Time: 09:58 AM

ROA Report

Page 1 of 1

Case: 2003-01487-CD

Current Judge: Fredric Joseph Ammerman

Wells Fargo Home Mortgage, Inc. vs. Brent Coder, Melanie Coder

Civil Other

Date		Judge
10/03/2003	✓ Filing: Civil Complaint-Ejectment, Paid by: Federman & Phelan LLP ✓ Receipt number: 1867026 Dated: 10/03/2003 Amount: \$85.00 (Check) 1 Cert. to Sheriff	No Judge
10/22/2003	✓ Sheriff Returns, Complaint on Defendant. So Answers, Chester A. ✓ Hawkins by s/Marilyn Hamm \$69.04 paid by Attorney	No Judge
11/14/2003	✓ OBJECTION. filed by, s/Brent Coder 1 cc to Defendant	No Judge
04/01/2004	✓ Motion For Summary Judgment. filed by, s/Noelle A. Connor, Esquire no c	No Judge
	✓ Certificate of Service of Motion for Summary Judgment and Supporting Brief on Def. No CC.	No Judge
04/02/2004	✓ Praecipe to Index Melanie Coder as Defendant filed by Atty. Connor. No CC.	No Judge
04/12/2004	✓ ORDER, NOW, this 8th day of April, 2004, re: Rule issued upon Defendant. Argument is scheduled the 7th day of May, 2004 at 2:30 p.m. in Courtroom No. 1. by the Court, s/FJA, P.J. 2 cc & Memo re: Service to Atty Connor	Fredric Joseph Ammerman
05/03/2004	✓ Certificate of Service, Order of April 8, 2004, upon Brent Coder, Pro Se and Melanie K. Coder, Pro Se filed by, s/Noelle A. Connor, Esquire no cc	Fredric Joseph Ammerman
05/07/2004	✓ Praecipe To Enter Appearance On Behalf Of Wells Fargo Home Mortgage, Inc. s/Dwight L. Koerber, Jr., Esquire Certificate of Service 4 cc Atty Koerber Copy to C/A	Fredric Joseph Ammerman

CA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

WELLS FARGO HOME MORTGAGE, INC. :

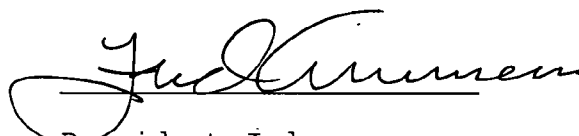
VS. : NO. 2003-1487-CD

BRENT CODER and MELANIE CODER :

O R D E R

NOW, this 28th day of May, 2004, it is the ORDER of this Court that the Plaintiff's Motion for Summary Judgment be and is hereby granted. The Plaintiff is hereby given the exclusive possession of the premises in question against the Defendants and any other individuals who may be occupying the property located at 115 Wayne Road, Dubois, Clearfield County, Pennsylvania.

BY THE COURT:


President Judge

FILED

MAY 27 2004

William A. Shaw
Prothonotary

Federman and Phelan
BY: Francis S. Hallinan, Esquire
Identification No. 62695
Suite 1400, One Penn Center
Philadelphia, PA 19103
(215) 563-7000

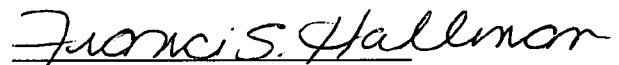
ATTORNEY FOR PLAINTIFF

Wells Fargo Home Mortgage, Inc.	:	COURT OF COMMON PLEAS
	:	CIVIL DIVISION
	:	
vs	:	No. 2003-1487-CD
	:	
Brent Coder Or Occupants 115 Wayne Road Dubois, PA 15801	:	Clearfield County

PRAECIPE FOR JUDGMENT IN EJECTMENT

TO THE PROTHONOTARY:

Kindly enter Judgment in Ejectment in favor of the Plaintiff, Wells Fargo Home Mortgage, Inc. and against the Defendant(s) Brent Coder and Or Occupants for possession of premises 115 Wayne Road, Dubois, PA 15801, pursuant to the attached court order dated May 28, 2004.


Francis S. Hallinan, Esquire
Attorney for Plaintiff

Default Judgment entered as indicated above.

DATE

FILED

JUN 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

Federman and Phelan
BY: Francis S. Hallinan, Esquire
Identification No. 62695
Suite 1400, One Penn Center
Philadelphia, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

Wells Fargo Home Mortgage, Inc.

:

COURT OF COMMON PLEAS

:

CIVIL DIVISION

:

vs

:

No. 2003-1487-CD

Brent Coder
Or Occupants
115 Wayne Road
Dubois, PA 15801

:

Clearfield County

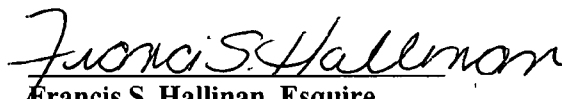
VERIFICATION OF NON-MILITARY SERVICE

Francis S. Hallinan, Esquire, hereby verifies that he is Attorney for 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 Brent Coder Or occupants, is over 18 years of age, and resides at 115 Wayne Road, Dubois, PA 15801.

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


Francis S. Hallinan, Esquire
Attorney for Plaintiff

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

WELLS FARGO HOME MORTGAGE, INC. :

VS. : NO. 2003-1487-CD

BRENT CODER and MELANIE CODER :

O R D E R

NOW, this 28th day of May, 2004, it is the ORDER of this Court that the Plaintiff's Motion for Summary Judgment be and is hereby granted. The Plaintiff is hereby given the exclusive possession of the premises in question against the Defendants and any other individuals who may be occupying the property located at 115 Wayne Road, Dubois, Clearfield County, Pennsylvania.

BY THE COURT:

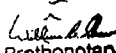
/s/ Fredric J. Ammerman

President Judge

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

MAY 27 2004

Attest.


Prothonotary/
Clerk of Courts

COPY

OFFICE OF THE PROTHONOTARY

COURT OF COMMON PLEAS

TO: Brent Coder OR OCCUPANTS
115 Wayne Road
Dubois, PA 15801

Wells Fargo Home Mortgage, Inc. : COURT OF COMMON PLEAS
: CIVIL DIVISION
Vs :
: No. 2003-1487-CD
Brent Coder
Or Occupants : Clearfield County
115 Wayne Road
Dubois, PA 15801
Attorney ID # 62695

NOTICE

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

Prothonotary

6/15/04

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

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:

ATTORNEY: Francis S. Hallinan Esquire, at this telephone number: (215) 563-7000.

PRAECIPE FOR WRIT OF POSSESSION

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF Clearfield

FILED

JUN 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

Wells Fargo Home Mortgage, Inc.	:	COURT OF COMMON PLEAS
	:	CIVIL DIVISION
	:	
vs	:	No. 2003-1487-CD
Brent Coder	:	
Or Occupants	:	Clearfield County
115 Wayne Road		
Dubois, PA 15801		

PRAECIPE FOR WRIT OF POSSESSION

TO THE PROTHONOTARY:

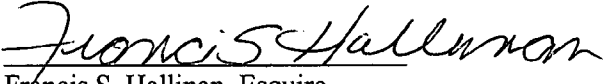
Issue Writ of Possession in the above matter for possession of:

115 Wayne Road, Dubois, PA 15801

****PLEASE SEE THE ATTACHED LEGAL DESCRIPTION****

125.00 Prothonotary costs

Being Known as No. 115 Wayne Road


Francis S. Hallinan, Esquire
Attorney for Plaintiff

Commonwealth of Pennsylvania

County of Clearfield

Court of Common Pleas

Wells Fargo Home Mortgage, Inc.

vs.

NO.2003-1487-CD

Brent Coder
Or occupants
115 Wayne Road
Dubois, PA 15801

Writ of Possession

TO THE SHERIFF OF Clearfield COUNTY:

(1) To satisfy the judgment for possession in the above matter you are directed to deliver Possession of the following described property to:

Wells Fargo Home Mortgage, Inc.

(2) To satisfy the costs against

**Brent Coder
Or occupants
115 Wayne Road
Dubois, PA 15801**

directed to levy upon any property of

you are

**Brent Coder
Or occupants
115 Wayne Road
Dubois, PA 15801**

interest therein.

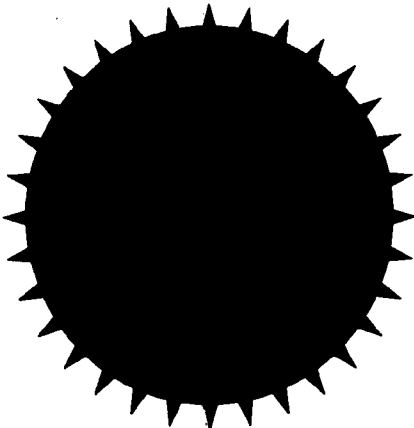
and sell

125.00 Prothonotary costs

Prothonotary

By _____
Clerk

Date 6/15/04



Court of Common Pleas

TERM,

NO. 2003-1487-CD

Wells Fargo Home Mortgage, Inc.

vs.

Brent Coder

Or occupants

115 Wayne Road

Dubois, PA 15801

WRIT OF POSSESSION

Federman & Phelan, LLP

One Penn Center at Suburban Station

1617 JFK Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000


Francis S. Hallinan, Esquire

Premises: 115 WAYNE ROAD, TOWNSHIP OF SANDY
CLEARFIELD COUNTY
PA

Based upon the examination of evidence in the appropriate public records, Company certifies that the premises endorsed hereon are subject to the liens, encumbrances and exceptions to title hereinafter set forth. This Certificate does not constitute title insurance; liability hereunder is assumed by the Company solely in its capacity as an abstractor for its negligence, mistakes or omissions in a sum not to exceed Two Thousand Dollars.

DESCRIPTION

ALL THAT CERTAIN message or piece of land situate and being in Sandy Township, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the Southwest corner of Lot No. 2 in the E.F. Hand Plan of Lots in Sandy Township; thence North 60 degrees West, 70 feet to a point on a street or alley; thence along said street or alley, North 30 degrees 15 minutes East, 200 feet to a point on the Southerly side of Wayne Road, also being a public road leading from DuBois to Reynoldsville; thence along said road, South 60 degrees East, 70 feet to a point at the westerly line of said Lot No. 2; which lot is now or formerly owned by Jack E. and Kay Guthridge, South 30 degrees 15 minutes West, 200 feet to the place of beginning. Being known as Lot No. 3 in the E.F. Hand Plan of Lots of Sandy Township, Clearfield County, Pennsylvania.

TAX PARCEL #128.0-B04-438-00024

FEDERMAN AND PHELAN, LLP
By: Frank Federman, Esquire
Atty. I.D. No.: 12248
One Penn Center at Suburban Station
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

Attorney for Plaintiff

WELLS FARGO HOME MORTGAGE, INC.

Plaintiff

vs.

Court of Common Pleas
CLEARFIELD County
No. 2003-1487-CD

BRENT CODER OR OCCUPANTS

Defendant(s)

FILED

M 2:15 PM 1cc & Cert
to Clerk
SEP 27 2004
Court to EA

PRAECIPE TO WITHDRAW COMPLAINT,
VACATE JUDGMENT AND DISCONTINUE AND
END ACTION, WITHOUT PREJUDICE

William A. Shaw
Prothonotary

TO THE PROTHONOTARY:

Kindly withdraw the complaint filed in the instant matter, without prejudice, vacate the judgment and mark this case discontinued and ended, upon payment of your costs only.

Date

9/21/04

Frank Federman
Frank Federman
Attorney for Plaintiff

**IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA**

CIVIL DIVISION

Wells Fargo Home Mortgage, Inc.

Vs.

No. 2003-01487-CD

Brent Coder

Melanie Coder

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on September 27, 2004, marked:

Discontinued, Settled and Ended.

Record costs in the sum of \$194.04 have been paid in full by Attorney Federman..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 27th day of September A.D. 2004.

William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 15956
NO: 03-1487-CD

PLAINTIFF: WELLS FARGO HOME MORTGAGE, INC.
vs.
DEFENDANT: BRENT CODER

WRIT OF EXECUTION POSSESSION

SHERIFF RETURN

SERVICES

07/16/2004 @ 11:18 AM SERVED BRENT CODER OR OCCUPANTS

SERVED BRENT CODER, DEFENDANT, AT HIS RESIDENCE, 115 WAYNE ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY
HANDING TO BRENT CODER

A TRUE AND ATTESTED COPY OF THE WRIT OF POSSESSION AND BY MAKING KNOWN TO HIM THE CONTENTS THEREOF.

@ SERVED
NOW, 8/3/04 PROPERTY RECHECKED, RESIDENCE EMPTY, 8/5/04 INFORMED ATTORNEY.

@ SERVED
NOW MARCH 19, 2004 RETURN WRIT AS BEING SERVED.

FILED
019:55
MAR 21 2005

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 15956
NO: 03-1487-CD

PLAINTIFF: WELLS FARGO HOME MORTGAGE, INC.
vs.
DEFENDANT: BRENT CODER

WRIT OF EXECUTION POSSESSION

SHERIFF RETURN

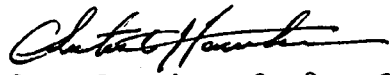
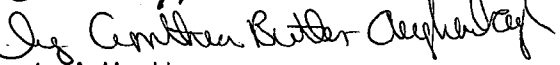
SHERIFF HAWKINS \$37.25

SURCHARGE \$10.00 PAID BY ATTORNEY

Sworn to Before Me This

_____ Day of _____ 2005

So Answers,



Chester A. Hawkins
Sheriff

Commonwealth of Pennsylvania

County of Clearfield

Court of Common Pleas

Wells Fargo Home Mortgage, Inc.

vs.

NO.2003-1487-CD

Brent Coder
Or occupants
115 Wayne Road
Dubois, PA 15801

Writ of Possession

TO THE SHERIFF OF Clearfield COUNTY:

(1) To satisfy the judgment for possession in the above matter you are directed to deliver Possession of the following described property to:

Wells Fargo Home Mortgage, Inc.

(2) To satisfy the costs against

Brent Coder
Or occupants
115 Wayne Road
Dubois, PA 15801

directed to levy upon any property of

you are

Brent Coder
Or occupants
115 Wayne Road
Dubois, PA 15801

interest therein.

and sell

125.00 Prothonotary
Costs

Prothonotary

By

William L. [Signature]

Clerk

Date 6/15/04

Received June 15, 2004 @ 3:00 P.M.
Chester C. Hawkins
by Cynthia Sutton-Aughanbaugh

Court of Common Pleas

TERM,

NO. 2003-1487-CD

Wells Fargo Home Mortgage, Inc.

vs.

Brent Coder

Or occupants

115 Wayne Road

Dubois, PA 15801

WRIT OF POSSESSION

Federman & Phelan, LLP

One Penn Center at Suburban Station

1617 JFK Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

Francis S. Hallinan
Francis S. Hallinan, Esquire

Premises: 115 WAYNE ROAD, TOWNSHIP OF SANDY
CLEARFIELD COUNTY
PA

Based upon the examination of evidence in the appropriate public records, Company certifies that the premises endorsed hereon are subject to the liens, encumbrances and exceptions to title hereinafter set forth. This Certificate does not constitute title insurance; liability hereunder is assumed by the Company solely in its capacity as an abstractor for its negligence, mistakes or omissions in a sum not to exceed Two Thousand Dollars.

DESCRIPTION

ALL THAT CERTAIN messuage or piece of land situate and being in Sandy Township, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the Southwest corner of Lot No. 2 in the E.F. Hand Plan of Lots in Sandy Township; thence North 60 degrees West, 70 feet to a point on a street or alley; thence along said street or alley, North 30 degrees 15 minutes East, 200 feet to a point on the Southerly side of Wayne Road, also being a public road leading from DuBois to Reynoldsville; thence along said road, South 60 degrees East, 70 feet to a point at the westerly line of said Lot No. 2; which lot is now or formerly owned by Jack E. and Kay Guthridge, South 30 degrees 15 minutes West, 200 feet to the place of beginning. Being known as Lot No. 3 in the E.F. Hand Plan of Lots of Sandy Township, Clearfield County, Pennsylvania.

TAX PARCEL #128.0-B04-438-00024