

03-1620-CD  
CITICORP TRUST BANK vs. JOHN DOE et al.

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, FSB f/k/a  
Citifinancial Services, Inc.  
7467 New Ridge Road,  
Suite 200  
Hanover, Maryland 21076  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 03-1620 CD

v.

John Doe  
and/or Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656  
Defendant(s)

CIVIL ACTION  
COMPLAINT IN EJECTMENT

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.

LAWYERS REFERRAL SERVICE  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

FILED

OCT 30 2003

William A. Shaw  
Prothonotary/Clerk of Courts

### **AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

**LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.**

SERVICE DE REFERENCIA E INFORMACION LEGAL  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

1. Plaintiff is the corporation or individual named on the caption, and whose address or principal office appears in the caption.

2. Defendant(s) are those named as such on the caption, and occupy the premises (hereinafter "Premises") which address is set forth on the caption.

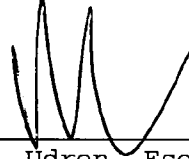
3. Premises, a legal description of which is attached hereto, was sold at Sheriff's Sale in accordance with law on October 10, 2003, and Plaintiff became owner thereof as a result of being the successful bidder and thus the purchaser at said sale, and remains real owner thereof. (Abstract of Title).

4. The person(s) in possession of Premises are the Defendant(s) herein, and are occupying Premises without right or claim to title.

5. Plaintiff has demanded possession of Premises from Defendant(s) who have refused to deliver up the possession thereof.

WHEREFORE, Plaintiff demands judgment for immediate possession of Premises, issuance of a Writ of Possession and a judgment of its costs and disbursement in this action.

MARK J. UDREN & ASSOCIATES

A handwritten signature in black ink, appearing to read 'Mark J. Udren', is written over a horizontal line.

Mark J. Udren, Esquire  
ATTORNEY FOR PLAINTIFF

ALL THAT CERTAIN PROPERTY LOCATED IN IRVONA BOROUGH, CLEARFIELD COUNTY,  
PENNSYLVANIA, TOGETHER WITH THE IMPROVEMENTS ERRECTED THEREON, BOUNDED AND DESCRIBED  
AS FOLLOWS:

BEGINNING AT A POST ON THE NORTHWEST CORNER OF BERWIND AND EMMA STREET; THENCE  
NORTHWESTERLY BY EMMA STREET ONE HUNDRED FIFTY (150) FEET TO AN ALLEY; THENCE BY  
SAID ALLEY FIFTY (50) FEET TO LOT NO. 211; THENCE BY SAME ONE HUNDRED FIFTY (150)  
FEET TO BERWIND STREET; THENCE BY SAME EASTERLY FIFTY (50) FEET TO A POST ON EMMA  
STREET AND PLACE OF BEGINNING. BEING REFERRED TO A LOT NO. 212.

BEING IDENTIFIED BY CLEARFIELD COUNTY ASSESSMENT MAP NUMBER 11-H16-353-121.

BEING KNOWN AS 313 BERWIND STREET, IRVONA, PA 16656

VERIFICATION

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation; that he is authorized to take this verification and does so because Plaintiff must verify through agents and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the facts set forth in the foregoing pleading are true and correct to the best of his knowledge information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

MARK J. UDREN & ASSOCIATES

A handwritten signature in black ink, consisting of a stylized 'M' followed by a series of loops and a final flourish.

---

Mark J. Udren, Esquire

DATED: October 28, 2003

~~FILED~~ *Atty uden pd 8500*  
~~10/11/03~~ *2ccshf*  
OCT 30 2003

William A. Shaw  
Prothonotary/Clerk of Courts

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

CITICORP TRUST BANK

VS.

DOE, JOHN and/or Tenant/Occupant

COMPLAINT IN EJECTMENT

Sheriff Docket #

14737

03-1620-CD

**SHERIFF RETURNS**

NOW NOVEMBER 14, 2003 AT 12:42 PM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON JOHN DOE, DEFENDANT AT RESIDENCE, 313 BERWIND ST., IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JESSICA HARRIS, WIFE OF RONALD HARRIS A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: NEVLING/MCCLEARY

NOW NOVEMBER 14, 2003 AT 12:42 PM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON TENANT/OCCUPANT, DEFENDANT AT RESIDENCE, 313 BERWIND ST., IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JESSICA HARRIS, ADULT AT RESIDENCE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVE BY: MCCLEARY/NEVLING

**Return Costs**

| Cost  | Description                   |
|-------|-------------------------------|
| 43.44 | SHERIFF HAWKINS PAID BY: ATTY |
| 20.00 | SURCHARGE PAID BY: ATTY       |

Sworn to Before Me This

12<sup>th</sup> Day Of Dec 2003

William A. Shaw  
WILLIAM A. SHAW

Prothonotary

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

So Answers,

Chester A. Hawkins  
by Maury Harris

Chester A. Hawkins

Sheriff

**FILED**

DEC 12 2003

William A. Shaw  
Prothonotary/Clerk of Courts

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, FSB f/k/a  
Citifinancial Services, Inc.  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

NO. 03-1620-CD

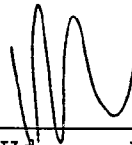
John Doe  
Tenant/Occupant  
Defendant(s)

PRAECIPE TO INDEX DEFENDANT  
PURSUANT TO PA.R.C.P. 410(b)(2)

TO THE PROTHONOTARY:

Kindly index as a Defendant, pursuant to Pa.R.C.P. 410(b)(2),  
Jessica Harris, who was found in possession of the real property  
subject of the within action in Ejectment.

MARK J. UDREN & ASSOCIATES



Mark J. Udren, Esquire  
Attorney for Plaintiff

FILED

DEC 15 2003

William A. Shaw  
Prothonotary Clerk of Courts

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
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ATTORNEY FOR PLAINTIFF

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7467 New Ridge Road,  
Suite 200  
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Plaintiff

COURT OF COMMON PLEAS  
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NO. 03-1620-CD

v.

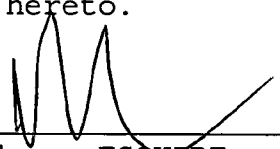
John Doe  
Jessica Harris  
and/or Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656  
Defendant(s)

**PRAECIPE FOR JUDGMENT IN EJECTMENT**

TO THE PROTHONOTARY:

Kindly enter Judgment in Ejectment in favor of the Plaintiff and against the Defendant(s), John Doe, Jessica Harris and Tenant/Occupant for possession of the premises appearing in the caption, for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof.

I hereby certify that notice has been given in accordance with Rule 237.1, a copy of which is attached hereto.

  
Mark J. Udren, ESQUIRE  
Attorney for Plaintiff

DEFAULT JUDGMENT ENTERED AS INDICATED ABOVE:

DATE: Dec. 26, 2003

  
PRO PROTHY

**FILED**

DEC 26 2003

11:30 AM  
William A. S. Prothy

Prothonotary, Clerk of Court

NOTICE TO DEPT.

STATEMENT TO ATT.

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, FSB f/k/a  
Citifinancial Services, Inc.  
7467 New Ridge Road,  
Suite 200  
Hanover, Maryland 21076  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 03-1620-CD

v.

John Doe  
Jessica Harris  
and Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656

Defendant(s)

TO: John Doe  
313 Berwind Street  
Irvona, PA 16656

DATE of Notice: December 11, 2003

**IMPORTANT NOTICE**

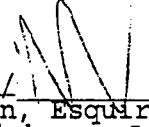
YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT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

LAWYER REFERRAL SERVICE  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

**NOTIFICACION IMPORTANTE**

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUIRIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO IMMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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/s/   
Mark J. Udren, Esquire  
1040 North Kings Highway, Suite 500  
Cherry Hill, New Jersey 08034

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, FSB f/k/a  
Citifinancial Services, Inc.  
7467 New Ridge Road,  
Suite 200  
Hanover, Maryland 21076  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 03-1620-CD

v.

John Doe  
Jessica Harris  
and Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656  
Defendant(s)

TO: Jessica Harris  
313 Berwind Street  
Irvona, PA 16656

DATE of Notice: December 11, 2003

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/s/   
Mark J. Udren, Esquire  
1040 North Kings Highway, Suite 500  
Cherry Hill, New Jersey 08034

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, ESQUIRE  
ATTY I.D. NO. 04302  
1040 NORTH KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NEW JERSEY 08034  
856 482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, FSB f/k/a  
Citifinancial Services, Inc.  
7467 New Ridge Road,  
Suite 200  
Hanover, Maryland 21076  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 03-1620-CD

v.

John Doe  
Jessica Harris  
and Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656  
Defendant(s)

TO: Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656

DATE of Notice: December 11, 2003

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800-692-7375

/s/  
Mark J. Udren, Esquire  
1040 North Kings Highway, Suite 500  
Cherry Hill, New Jersey 08034

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

Citicorp Trust Bank, FSB  
Plaintiff(s)

No.: 2003-01620-CD

Real Debt: \$Possession

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

John Doe  
Tenant  
Occupant  
Jessica Harris  
Defendant(s)

Entry: \$20.00

Instrument: Judgment in Ejectment

Date of Entry: December 26, 2003

Expires: December 26, 2008

Certified from the record this December 26, 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

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, FSB f/k/a  
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COURT OF COMMON PLEAS  
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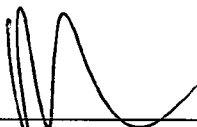
#### VERIFICATION OF NON-MILITARY SERVICE

Mark J. Udren, 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:

That the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended, and that the age and last known residence and employment of each Defendant are as follows:

Defendant: Jessica Harris  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

DATED: 12/22/03

  
Mark J. Udren, ESQUIRE

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
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NO. 03-1620-CD

v.

John Doe  
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and/or Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656  
Defendant(s)

TO: Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656

#### 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.

\_\_\_ Judgment by Default  
\_\_\_ Money Judgment  
\_\_\_ Judgment in Replevin  
X Judgment for Possession  
\_\_\_ Judgment on Award of Arbitration  
\_\_\_ Judgment on Verdict  
\_\_\_ Judgment on Court Findings

Prothonotary



12-24-07

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:  
ATTORNEY MARK J. UDREN, ESQUIRE  
At this telephone number: 856-482-6900

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
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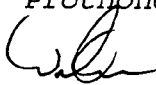
v.

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Defendant(s)

TO: Jessica Harris  
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|          |                                  |  |
|----------|----------------------------------|--|
| ___      | Judgment by Default              | <i>Prothonotary</i><br><br>12-26-07 |
| ___      | Money Judgment                   |  |
| ___      | Judgment in Replevin             |  |
| <u>X</u> | Judgment for Possession          |  |
| ___      | Judgment on Award of Arbitration |  |
| ___      | Judgment on Verdict              |  |
| ___      | Judgment on Court Findings       |  |

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ATTORNEY MARK J. UDREN, ESQUIRE  
At this telephone number: 856-482-6900

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, FSB f/k/a  
Citifinancial Services, Inc.  
7467 New Ridge Road,  
Suite 200  
Hanover, Maryland 21076  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 03-1620-CD

v.

John Doe  
Jessica Harris  
and/or Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656  
Defendant(s)

TO: John Doe  
313 Berwind Street  
Irvona, PA 16656

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.

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

Prothonotary



(12-16-03)

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:  
ATTORNEY: MARK J. UDREN, ESQUIRE  
At this telephone number: 856-482-6900

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

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COURT OF COMMON PLEAS  
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Clearfield County

NO. 03-1620-CD

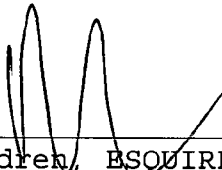
v.

John Doe  
Jessica Harris  
and/or Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656  
Defendant(s)

PRAECIPE FOR WRIT OF POSSESSION

TO THE PROTHONOTARY:

Issue Writ of Possession in the above matter, for possession of the property captioned under Defendants above, a description of which is attached hereto:

  
\_\_\_\_\_  
Mark J. Udren, ESQUIRE  
Attorney for Plaintiff

FILED

DEC 26 2003

William A. Shaw

Prothonotary/Clerk of Courts

6 UNITS TO SHERIFF

ALL THAT CERTAIN PROPERTY LOCATED IN IRVONA BOROUGH, CLEARFIELD COUNTY, PENNSYLVANIA, TOGETHER WITH THE IMPROVEMENTS ERECTED THEREON, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POST ON THE NORTHWEST CORNER OF BERWIND AND EMMA STREET; THENCE NORTHWESTERLY BY EMMA STREET ONE HUNDRED FIFTY (150) FEET TO AN ALLEY; THENCE BY SAID ALLEY FIFTY (50) FEET TO LOT NO. 211; THENCE BY SAME ONE HUNDRED FIFTY (150) FEET TO BERWIND STREET; THENCE BY SAME EASTERLY FIFTY (50) FEET TO A POST ON EMMA STREET AND PLACE OF BEGINNING. BEING REFERRED TO A LOT NO. 212.

BEING IDENTIFIED BY CLEARFIELD COUNTY ASSESSMENT MAP NUMBER 11-H16-353-121.

BEING KNOWN AS 313 BERWIND STREET, IRVONA, PA 16656

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

Citicorp Trust Bank, FSB f/k/a  
Citifinancial Services, Inc.  
7467 New Ridge Road,  
Suite 200  
Hanover, Maryland 21076  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 03-1620-CD

v.

John Doe  
Jessica Harris  
and/or Tenant/Occupant  
313 Berwind Street  
Irvona, PA 16656  
Defendant(s)

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 property to:

Citicorp Trust Bank, FSB f/k/a Citifinancial Services, Inc.  
(See Legal Description Attached)

(2) To satisfy the costs against Defendants directed to levy upon any property of Defendants and sell their interest therein.

Prothonotary

By \_\_\_\_\_  
Clerk

Date \_\_\_\_\_

COURT OF COMMON PLEAS

NO. 03-1620-CD

Citicorp Trust Bank, FSB f/k/a Citicifinancial Services, Inc.  
Plaintiff

VS.

John Doe  
Jessica Harris  
and/or Tenant/Occupant  
Defendants

---

WRIT OF POSSESSION


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Costs

Prothy Pd.

Judgment Fee

Satisfaction Fee

  
\_\_\_\_\_  
Mark J. Udren, ESQUIRE

Mark J. Udren & Associates

1040 NORTH KINGS HIGHWAY, SUITE 500

CHERRY HILL, NEW JERSEY 08034

I.D. #04302

ATTORNEY FOR PLAINTIFF

Address: 313 Berwind Street  
Irvington, PA 16656

WHERE PAPERS MAY BE SERVED

ALL THAT CERTAIN PROPERTY LOCATED IN IRVONA BOROUGH, CLEARFIELD COUNTY, PENNSYLVANIA, TOGETHER WITH THE IMPROVEMENTS ERECTED THEREON, BOUNDED AND DESCRIBED AS FOLLOWS:

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BEING IDENTIFIED BY CLEARFIELD COUNTY ASSESSMENT MAP NUMBER 11-H16-353-121.

BEING KNOWN AS 313 BERWIND STREET, IRVONA, PA 16656

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

Sheriff Docket # 14987

CITICORP TRUST BANK, FSB F/K/A CITIFINANCIAL SERVICES, INC.

03-1620-CD

VS.

DOE, JOHN

WRIT OF EXEUCION      POSSESSION

**SHERIFF RETURNS**

NOW, JANUARY 7, 2004 @ 10:40 A.M. O'CLOCK ATTEMPTED TO SERVE WRIT OF POSSESSION ON JOHN DOE, JESSICA HARRIS, AND/OR TENANT/OCCUPANT. THE HOUSE WAS EMPTY.

NOW, MAY 13, 2004 PAID COSTS FROM ADVANCE AND MADE A REFUND OF THE UNUSED ADVANCE TO THE ATTORNEY.\_

NOW, MAY 13, 2004, RETURN WRIT AS NOT BEING SERVED.HOUSE EMPTY.

SHERIFF HAWLINS      \$61.62  
SURCHARGE      \$30.00  
PAID BY ATTORNEY

Sworn to Before Me This

13<sup>th</sup> Day Of *May* 2004

*William A. Shaw*

**FILED**

MAY 13 2004

William A. Shaw  
Prothonotary

So Answers,

*Chester A. Hawkins*  
*Dez Cynthia Butler-Ceyhenkay*

Chester A. Hawkins  
Sheriff

*KS*

MARK J. UDREN & ASSOCIATES  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
1040 N. KINGS HIGHWAY, SUITE 500  
CHERRY HILL, NJ 08034  
856-482-6900

ATTORNEY FOR PLAINTIFF

WE HEREBY CERTIFY THE  
WITHIN IS A TRUE AND  
CORRECT COPY OF THE ORIGINAL

Citicorp Trust Bank, FSB f/k/a  
Citifinancial Services, Inc.  
7467 New Ridge Road,  
Suite 200  
Hanover, Maryland 21076  
Plaintiff

COURT OF COMMON PLEAS  
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(See Legal Description Attached)

(2) To satisfy the costs against Defendants directed to levy upon any property of Defendants and sell their interest therein.

Prothonotary

By 

Clerk

Date 12-26-03

Received 12-29-03 @ 10:00 am

Chastin A. Hawkins

by Cynthia Butler-Aydenbaugh

COURT OF COMMON PLEAS

NO. 03-1620-CD

Citicorp Trust Bank, FSB f/k/a Citifinancial Services, Inc.

Plaintiff

VS.

John Doe

Jessica Harris

and/or Tenant/Occupant  
Defendants

---

WRIT OF POSSESSION


---

Costs

Prothy Pd.

Judgment Fee

Satisfaction Fee

  
\_\_\_\_\_  
Mark J. Udren, ESQUIRE

Mark J. Udren & Associates

1040 NORTH KINGS HIGHWAY, SUITE 500

CHERRY HILL, NEW JERSEY 08034

I.D. #04302

ATTORNEY FOR PLAINTIFF

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BEING IDENTIFIED BY CLEARFIELD COUNTY ASSESSMENT MAP NUMBER 11-H16-353-121.

BEING KNOWN AS 313 BERWIND STREET, IRVONA, PA 16656

**FILED**

MAY 13 2004

*018-45*  
William A. Shaw  
Prothonotary