

03-1755-CD
CHASE MANHATTAN MORTGAGE CORP. vs. ROBIN A. EDWARDS, et al.

FEDERMAN AND PHELAN, LLP

By: FRANK FEDERMAN, ESQ., Id. No. 12248

LAWRENCE T. PHELAN, ESQ., Id. No. 32227

FRANCIS S. HALLINAN, ESQ., Id. No. 62695

ONE PENN CENTER PLAZA, SUITE 1400

PHILADELPHIA, PA 19103

(215) 563-7000

ATTORNEY FOR PLAINTIFF

CHASE MANHATTAN MORTGAGE CORPORATION

3415 VISION DRIVE

COLUMBUS, OH 43219

COURT OF COMMON PLEAS

CIVIL DIVISION

Plaintiff

TERM

v.

NO. 03-1755-02

CLEARFIELD COUNTY

ROBIN A. EDWARDS

MICHAEL T. WILLIAMS

RD2 BOX 149

A/K/A RR 2 BOX 149

GINTER, PA 16651

Defendant(s)

FILED

NOV 24 2003

William A. Shaw
Prothonotary/Clerk of Courts

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.

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

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

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

**THE LAW DOES NOT REQUIRE US TO WAIT
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PERIOD FOLLOWING FIRST CONTACT WITH
YOU BEFORE SUING YOU TO COLLECT THIS
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**IF YOU HAVE FILED BANKRUPTCY AND
RECEIVED A DISCHARGE, THIS IS NOT AN
ATTEMPT TO COLLECT A DEBT. IT IS AN
ACTION TO ENFORCE A LIEN ON REAL
ESTATE.**

1. Plaintiff is

CHASE MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

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

ROBIN A. EDWARDS
MICHAEL T. WILLIAMS
RD2 BOX 149
A/K/A RR 2 BOX 149
GINTER, PA 16651

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

3. On 10/13/2000 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 Instrument # 200016864.
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 07/01/2003 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	\$38,956.61
Interest	1,625.16
06/01/2003 through 11/21/2003 (Per Diem \$9.34)	
Attorney's Fees	1,250.00
Cumulative Late Charges	34.45
10/13/2000 to 11/21/2003	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 42,416.22
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
TOTAL	\$ 42,416.22

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 \$ 42,416.22, together with interest from 11/21/2003 at the rate of \$9.34 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 LOT OR PIECE OF GROUND, PART OF THE TIMOTHY PAXSON TRACT, LYING IN THE TOWNSHIP OF GULICH, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, AND BEING PART OF LOT NO. 298 AND LOT NO. 299 OF "WHITESIDE VILLAGE", KNOWN AND DESCRIBED AS BEING:

BEGINNING AT A STAKE AT THE NORTHWEST CORNER OF RAILROAD AVENUE AND DOGWOOD STREETS; THENCE BY SAID RAILROAD AVENUE AND EIGHTY (80') FEET DISTANT FROM THE CENTER LINE OF MOSHANNON AND CLEARFIELD BRANCH OF THE TYRONE AND CLEARFIELD DIVISION OF THE PENNSYLVANIA RAILROAD SOUTH FIFTY-SIX DEGREES THIRTY-THREE MINUTES WEST ($256^{\circ}33'$ W) ONE HUNDRED FORTY-TWO AND TWO-TENTHS ($142.2'$) FEET TO A STAKE; THENCE SOUTH FIFTY-THREE DEGREES FORTY-FOUR MINUTES WEST ($S53^{\circ}44'$ W) FIFTY-EIGHT (58') FEET TO A STAKE AT THE SOUTHEAST CORNER OF LOT NO. 300; THENCE THEREBY NORTH THIRTY-SIX DEGREES SIXTEEN MINUTES WEST ($N36^{\circ}16'$ W) FOUR HUNDRED SEVENTY-THREE AND NINE TENTHS ($473.9'$) FEET TO A STAKE ON THE SOUTH BANK OF WHITESIDE RUN; THENCE MEANDERING SAME IN A NORTHEASTERLY DIRECTION TWO HUNDRED FORTY-FIVE (245') FEET, MORE OR LESS, TO A STAKE ON LOT NOW OR FORMERLY OF C. IRA STOTT; THENCE STILL THEREBY SOUTH THIRTY-SIX DEGREES SIXTEEN MINUTES EAST ($S36^{\circ}16'$ E) THREE HUNDRED (300') FEET, MORE OR LESS, TO A STAKE; THENCE STILL THEREBY IN A SOUTHEASTERLY DIRECTION, FORTY-FOUR (44') FEET TO A STAKE ON DOGWOOD STREET; AND THENCE THEREBY SOUTH THIRTY-SIX DEGREES SIXTEEN MINUTES EAST ($S36^{\circ}16'$ E) ALONG DOGWOOD STREET TO POST AND PLACE OF BEGINNING; AND BEING PART OF LOT NO. 298 AND LOT NO. 299.

PROPERTY ADDRESS: RD 2 BOX 149 a/k/a PRR 2 BOX 149

VERIFICATION

DAVID LOVETT hereby states that he is ASSISTANT SECRETARY of CHASE MORTGAGE COMPANY WEST (CO) 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 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.



DAVID LOVETT ASSISTANT SECRETARY

DATE: 11/19/03

FILED

REC ~~4~~ 51.55
NOV 24 2003
Att'y pd 85.00

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

CHASE MANHATTAN MORTGAGE CORPORATION

VS.

EDWARDS, ROBIN A. & MICHAEL T.

Sheriff Docket #

14868

03-1755-CD

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW NOVEMBER 25, 2003 DENNY NAU, SHERIFF OF CENTRE COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON ROBIN A. EDWARDS & MICHAEL T. WILLIAMS, DEFENDANTS.

NOW DECEMBER 2, 2003 SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURES ON ROBIN A. EDWARDS AND MICHAEL T. WILLIAMS, DEFENDANTS BY DEPUTIZING THE SHERIFF OF CENTRE COUNTY. THE RETURN OF SHERIFF NAU IS HERETO ATTACHED AND MADE A PART OF THIS RETURN STATING THAT HE SERVED BOTH COPIES ON RACHAEL STOVER, SISTER OF ROBIN WILLIAMS.

NOW JANUARY 14, 2004 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO ROBIN A. EDWARDS and MICHAEL T. WILLIAMS, DEFENDANTS AT RD#2 BOX 149 A/K/A RR#2 BOX 149, GINTER, PA. ACCORDING TO POST OFFICE MOVED LEFT NO FORWARDING.

Return Costs

Cost	Description
55.00	SHERIFF HAWKINS PAID BY: ATTY CK# 314958
40.00	SURCHARGE PAID BY: ATTY
32.00	CENTRE CO. SHFF. PAID BY: ATTY.

Sworn to Before Me This

15th Day Of Jan 2004

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 Maurya Lamp
Chester A. Hawkins
Sheriff

FILED

01/12/25/04
JAN 15 2004

William A. Shaw
Prothonotary/Clerk of Courts

14868

SHERIFF'S OFFICE

CENTRE COUNTY

Rm 101 Court House, Bellefonte, Pennsylvania, 16823 (814) 355-6803

SHERIFF SERVICE		INSTRUCTIONS FOR SERVICE OF PROCESS: You must file one instruction sheet for each defendant. please type or print legibly. Do Not detach any copies.
PROCESS RECEIPT, AND AFFIDAVIT OF RETURN		
1. Plaintiff(s) <u>Chase Manhattan Mortgage Corp.</u>		2. Case Number <u>03-1755-CD</u>
3. Defendant(s) <u>Robin & Michael Williams</u>		4. Type of Writ or Complaint: <u>Comp. in Mortgage Foreclosure</u>
SERVE → AT	5. Name of Individual, Company, Corporation, Etc., to Serve or Description of Property to be Levied, Attached or Sold.	
	6. Address (Street or RFD, Apartment No., City, Boro, Twp., State and Zip Code)	
7. Indicate unusual service: <input type="checkbox"/> Reg Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Deputize <input type="checkbox"/> Post <input type="checkbox"/> Other		
Now, _____ 20____. I SHERIFF OF CENTRE COUNTY, PA., do hereby deputize the Sheriff of _____ County to execute this Writ and make return thereof according to law. This deputation being made at the request and risk of the plaintiff. _____ Sheriff of Centre County		
8. SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE		

NOTE ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN – Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession, after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

9. Print/Type Name and Address of Attorney/Originator	10. Telephone Number	11. Date
	12. Signature	

SPACE BELOW FOR USE OF SHERIFF ONLY - DO NOT WRITE BELOW THIS LINE									
13. I acknowledge receipt of the writ or complaint as indicated above. }		SIGNATURE of Authorized CCSD Deputy of Clerk and Title			14. Date Filed		15. Expiration/Hearing Date		
TO BE COMPLETED BY SHERIFF									
16. Served and made known to <u>Rachael Stover</u> , on the <u>2nd</u> day of <u>December</u> , 20 <u>03</u> , at <u>12:56</u> o'clock, <u>P</u> m., at <u>213 E. Howard St. Bellefonte PA.</u> , County of Centre Commonwealth of Pennsylvania, in the manner described below:									
<input type="checkbox"/> Defendant(s) personally served. <input checked="" type="checkbox"/> Adult family member with whom said Defendant(s) resides(s). Relationship is <u>Robin Williams sister</u> <input checked="" type="checkbox"/> Adult in charge of Defendant's residence. <input type="checkbox"/> Manager/Clerk of place of lodging in which Defendant(s) resides(s). <input type="checkbox"/> Agent or person in charge of Defendant's office or usual place of business. <input type="checkbox"/> _____ and officer of said Defendant company. <input type="checkbox"/> Other _____									
On the _____ day of _____, 20____, at _____ o'clock, _____ M.									
Defendant not found because: <input type="checkbox"/> Moved <input type="checkbox"/> Unknown <input type="checkbox"/> No Answer <input type="checkbox"/> Vacant <input type="checkbox"/> Other _____									
Remarks: <u>Both papers served for Robin & Michael to Rachael Stover</u>									
Advance Costs	Docket	Service	Sur Charge	Affidavit	Mileage	Postage	Misc.	Total Costs	Costs Due or (Refund)
<u>75.00</u>	<u>9.00</u>	<u>18.00</u>	<u>20.00</u>	<u>3.50</u>	<u>3.00</u>	<u>1.00</u>	<u>.50</u>	<u>122.00</u>	<u>23.00</u>
17. AFFIRMED and subscribed to before me this <u>24</u>				So Answer.					
20. day of <u>Dec</u> 20 <u>03</u> <u>Cauna Peters</u> Notary Public My Commission Expires _____				18. Signature of Dep. Sheriff <u>Ann P. McLean</u>				19. Date <u>12-4-03</u>	
				21. Signature of Sheriff				22. Date	
My Commission Expires _____				SHERIFF OF CENTRE COUNTY					
				Amount Pd. _____				Page _____	
24. I ACKNOWLEDGE RECEIPT OF THE SHERIFF'S RETURN SIGNATURE OF AUTHORIZED AUTHORITY AND TITLE.								25. Date Received	



CHESTER A. HAWKINS
SHERIFF

Sheriff's Office Clearfield County

COURTHOUSE
1 NORTH SECOND STREET, SUITE 116
CLEARFIELD, PENNSYLVANIA 16830

#1864
OFFICE (814) 765-2641 EXT. 5986
AFTER 4:00 P.M. (814) 765-1533
FAX (814) 765-5915

ROBERT SNYDER
CHIEF DEPUTY
CYNTHIA AUGHENBAUGH
OFFICE MANAGER

MARILYN HAMM
DEPT. CLERK
PETER F. SMITH
SOLICITOR

DEPUTATION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 14868

CHASE MANHATTAN MORTGAGE CORP.

TERM & NO. 03-1755-CD

VS

DOCUMENT TO BE SERVED:

ROBIN A. EDWARDS & MICHAEL T. WILLIAMS

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 12/24/2003

MAKE REFUND PAYABLE TO: FEDERMAN & PHELAN, ESQ.

SERVE: ROBIN A. EDWARDS and MICHAEL T. WILLIAMS

ADDRESS: 213 EAST HOWARD ST., BELLEFONTE, PA. 16823

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF of
CLEARFIELD COUNTY, State of Pennsylvania, do hereby deputize the SHERIFF OF
CENTRE COUNTY, Pennsylvania to execute this writ. This
Deputation being made at the request and risk of the Plaintiff this 25th Day of
NOVEMBER 2003

Respectfully,


CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY

pg 2553-AA
pd 75-w

FEDERMAN AND PHELAN, LLP
By: FRANK FEDERMAN, ESQ., Id. No. 12248
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ATTORNEY FOR PLAINTIFF

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COLUMBUS, OH 43219

COURT OF COMMON PLEAS

CIVIL DIVISION

Plaintiff

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v.

NO. 03-1755-CD

CLEARFIELD COUNTY

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MICHAEL T. WILLIAMS
RD2 BOX 149
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Defendant(s)

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

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

NOV 24 2003

Attest.

William L. Shaw
Prothonotary/
Clerk of Courts

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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


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PROPERTY ADDRESS: RD 2 BOX 149 a/k/a RR 2 BOX 149

VERIFICATION

DAVID LOVETT hereby states that he is ASSISTANT SECRETARY of CHASE MORTGAGE COMPANY WEST (CO) 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 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.



DAVID LOVETT ASSISTANT SECRETARY

DATE: 11/19/03

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

ATTORNEY FOR PLAINTIFF

CHASE MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

COURT OF COMMON PLEAS

CIVIL DIVISION

Plaintiff

TERM

v.

NO 03-1755-02

CLEARFIELD COUNTY

ROBIN A. EDWARDS
MICHAEL T. WILLIAMS
RD2 BOX 149
A/K/A RR 2 BOX 149
GINTER, PA 16651

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

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

NOV 24 2003

Attest.

William L. Brown
Prothonotary/
Clerk of Courts

**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.**

**IF YOU HAVE FILED BANKRUPTCY AND
RECEIVED A DISCHARGE, THIS IS NOT AN
ATTEMPT TO COLLECT A DEBT. IT IS AN
ACTION TO ENFORCE A LIEN ON REAL
ESTATE.**

1. Plaintiff is

CHASE MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

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

ROBIN A. EDWARDS
MICHAEL T. WILLIAMS
RD2 BOX 149
A/K/A RR 2 BOX 149
GINTER, PA 16651

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

3. On 10/13/2000 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 Instrument # 200016864.
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 07/01/2003 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	\$38,956.61
Interest	1,625.16
06/01/2003 through 11/21/2003 (Per Diem \$9.34)	
Attorney's Fees	1,250.00
Cumulative Late Charges	34.45
10/13/2000 to 11/21/2003	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 42,416.22
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
TOTAL	\$ 42,416.22

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 \$ 42,416.22, together with interest from 11/21/2003 at the rate of \$9.34 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

9

ALL THAT LOT OR PIECE OF GROUND, PART OF THE TIMOTHY PAXSON TRACT, LYING IN THE TOWNSHIP OF GULICH, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, AND BEING PART OF LOT NO. 298 AND LOT NO. 299 OF "WHITESIDE VILLAGE", KNOWN AND DESCRIBED AS BEING:

BEGINNING AT A STAKE AT THE NORTHWEST CORNER OF RAILROAD AVENUE AND DOGWOOD STREETS; THENCE BY SAID RAILROAD AVENUE AND EIGHTY (80') FEET DISTANT FROM THE CENTER LINE OF MOSHANNON AND CLEARFIELD BRANCH OF THE TYRONE AND CLEARFIELD DIVISION OF THE PENNSYLVANIA RAILROAD SOUTH FIFTY-SIX DEGREES THIRTY-THREE MINUTES WEST ($256^{\circ}33' W$) ONE HUNDRED FORTY-TWO AND TWO-TENTHS (142.2') FEET TO A STAKE; THENCE SOUTH FIFTY-THREE DEGREES FORTY-FOUR MINUTES WEST ($S 53^{\circ}44' W$) FIFTY-EIGHT (58') FEET TO A STAKE AT THE SOUTHEAST CORNER OF LOT NO. 300; THENCE THEREBY NORTH THIRTY-SIX DEGREES SIXTEEN MINUTES WEST ($N 36^{\circ}16' W$) FOUR HUNDRED SEVENTY-THREE AND NINE TENTHS (473.9') FEET TO A STAKE ON THE SOUTH BANK OF WHITESIDE RUN; THENCE MEANDERING SAME IN A NORTHEASTERLY DIRECTION TWO HUNDRED FORTY-FIVE (245') FEET, MORE OR LESS, TO A STAKE ON LOT NOW OR FORMERLY OF C. IRA STOTT; THENCE STILL THEREBY SOUTH THIRTY-SIX DEGREES SIXTEEN MINUTES EAST ($S 36^{\circ}16' E$) THREE HUNDRED (300') FEET, MORE OR LESS, TO A STAKE; THENCE STILL THEREBY IN A SOUTHEASTERLY DIRECTION, FORTY-FOUR (44') FEET TO A STAKE ON DOGWOOD STREET; AND THENCE THEREBY SOUTH THIRTY-SIX DEGREES SIXTEEN MINUTES EAST ($S 36^{\circ}16' E$) ALONG DOGWOOD STREET TO POST AND PLACE OF BEGINNING; AND BEING PART OF LOT NO. 298 AND LOT NO. 299.

PROPERTY ADDRESS: RD 2 BOX 149 a/k/a RR 2 BOX 149

VERIFICATION

DAVID LOVETT hereby states that he is ASSISTANT SECRETARY of CHASE MORTGAGE COMPANY WEST (CO) 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 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.



DAVID LOVETT ASSISTANT SECRETARY

DATE: 11/19/03

Notice of Proposed Termination of Court Case

November 5, 2007

RE: 2003-01755-CD

Chase Manhattan Mortgage Corporation

Vs.

Robin A. Edwards
Michael T. Williams

FILED
NOV 05 2007
William A. Shaw
Prothonotary/Clerk of Courts

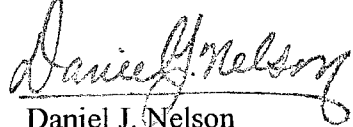
Dear Francis S. Hallinan, Esquire:

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the **Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830**. The Statement of Intention to Proceed must be filed on or before **January 4, 2008**.

If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,


Daniel J. Nelson
Court Administrator

Notice of Proposed Termination of Court Case

November 5, 2007

RE: 2003-01755-CD

Chase Manhattan Mortgage Corporation

Vs.

Robin A. Edwards
Michael T. Williams

Dear Robin A. Edwards:

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By the Court,

A handwritten signature in cursive script, appearing to read "Daniel J. Nelson", written over a horizontal line.

Daniel J. Nelson
Court Administrator

Notice of Proposed Termination of Court Case

November 5, 2007

RE: 2003-01755-CD

Chase Manhattan Mortgage Corporation

Vs.

Robin A. Edwards
Michael T. Williams

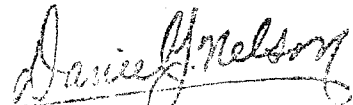
Dear Michael T. Williams:

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By the Court,

A handwritten signature in dark ink, appearing to read "Daniel J. Nelson", written over a horizontal line.

Daniel J. Nelson
Court Administrator

WILLIAM A. SHAW
PROTHONOTARY
and CLERK of COURTS
P.O. BOX 549
CLEARFIELD, PENNSYLVANIA 16830

03-1755-CD

FILED

NOV 13 2007

William A. Shaw
Prothonotary/Clerk of Courts

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Robin A. Edwards
Michael T. Williams
RD 2 Box 1
RR 2 Box 1
Ginter, PA

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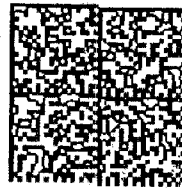
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Notice of Proposed Termination of Court Case

November 5, 2007

RE: 2003-01755-CD

Chase Manhattan Mortgage Corporation

Vs.

Robin A. Edwards
Michael T. Williams

Dear Robin A. Edwards:

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By the Court,

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Daniel J. Nelson
Court Administrator

Notice of Proposed Termination of Court Case

November 5, 2007

RE: 2003-01755-CD

Chase Manhattan Mortgage Corporation

Vs.

Robin A. Edwards
Michael T. Williams

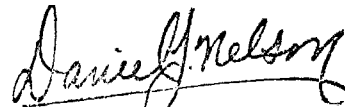
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By the Court,

A handwritten signature in black ink, appearing to read "Daniel J. Nelson", written over a horizontal line.

Daniel J. Nelson
Court Administrator

PHELAN HALLINAN & SCHMIEG, LLP

Lawrence T. Phelan, Esq., Id. No. 32227

Francis S. Hallinan, Esq., Id. No. 62695

Daniel G. Schmieg, Esq., Id. No.

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

CHASE MANHATTAN MORTGAGE CORPORATION Plaintiff	:	Court of Common Pleas
	:	
	:	Civil Division
	:	
vs	:	CLEARFIELD County
	:	
ROBIN A. EDWARDS	:	No. 2003-01755-CD
MICHAEL T. WILLIAMS	:	
	:	PHS# 81289
Defendant	:	

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to App.
NOV 13 2007
LMW

PRAECIPE

William A. Shaw
Prothonotary/Clerk of Courts

TO THE PROTHONOTARY:

____ Please mark the above referenced case Discontinued and Ended without prejudice.

____ Please mark the above referenced case Settled, Discontinued and Ended.

____ Please mark Judgments satisfied and the Action settled, discontinued and ended.

____ Please Vacate the judgment entered and mark the action discontinued and ended without prejudice.

X Please withdraw the complaint and mark the action discontinued and ended without prejudice.

Date: November 12, 2007

Francis S. Hallinan

Francis Hallinan
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Chase Manhattan Mortgage Corporation

Vs.

No. 2003-01755-CD

Robin A. Edwards

Michael T. Williams

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 November 13, 2007, marked:

Discontinued and ended without prejudice

Record costs in the sum of \$85.00 have been paid in full by Frank Federman Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 13th day of November A.D. 2007.



William A. Shaw, Prothonotary

LM