

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

Plaintiff

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

NO. 04-288-CJ

COMPLAINT IN MORTGAGE FORECLOSURE

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
David S. Meholick
Court Administrator
Clearfield, PA 16830
814-765-2641, ext. 5982

FILED

MAR 01 2004

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 ascentar 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.

**David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 482-6900**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: N/A

Assignments of Record to: N/A

Recording Date: N/A

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 814 Linden Street
MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Clearfield
COUNTY: Clearfield
DATE EXECUTED: 04/26/00
DATE RECORDED: 05/02/00 INSTR NO.: 200005955

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

(a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated

below;

- (b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 02/10/04:

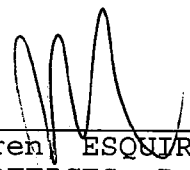
Principal of debt due	\$48,908.71
Unpaid Interest at 11.51% from 08/10/03 to 02/10/04 (the per diem interest accruing on this debt is \$9.67 and that sum should be added each day after 02/10/04)	1,739.87
Title Report	250.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$58.18 should be added in accordance with the terms of the note each month after 02/10/04)	1,621.39
Deferred Interest	2,610.54
Inspection Fee	24.50
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,445.44</u>
TOTAL	\$57,880.45

7. The attorney's fee 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 in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time

limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$57,880.45 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
Attorney for Plaintiff
Attorney I.D. No. 04302

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE STATE OF PENNSYLVANIA,
COUNTY OF CLEARFIELD, BOROUGH OF CLEARFIELD, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POST ON THE CORNER OF LOT NO. 7, FORMERLY OF IRA JAY; THENCE ALONG
THE LINE OF LOT NO. 7 IN AN EASTERLY DIRECTION A DISTANCE OF 170 FEET TO AN ALLEY;
THENCE ALONG SAID ALLEY IN A NORTHERLY DIRECTION A DISTANCE OF 50 FEET TO THE
CORNER OF LOT NO. 9, FORMERLY OWNED BY W. G. KELLEY; THENCE IN A WESTERLY DIRECTION
ALONG THE LINE OF LOT NO. 9, A DISTANCE OF 170 FEET TO LINDEN STREET; THENCE ALONG
LINDEN STREET IN A SOUTHERLY DIRECTION 50 FEET TO A POINT AND PLACE OF BEGINNING.
BEING KNOWN AS LOT NO. 8 IN BLOCK B OF THE G. L. REED ADDITION TO THE BOROUGH OF
CLEARFIELD, A PLOT OF PLAN OF WHICH IS RECORDED IN CLEARFIELD COUNTY IN
MISCELLANEOUS BOOK "U", PAGE 155.

BEING KNOWN AS: 814 LINDEN STREET, CLEARFIELD, PA

TAX PARCEL NO. 4.2-K08-237-54



Green Tree
Mortgage Services Division
7360 South Kyrene Rd
Tempe, AZ 85283

Date of Notice: January 6, 2004

Rose Kelly
222 Clinton Ave
Renovo, PA 17764

CERTIFIED NUMBER: 70001530000098199503

ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDITAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

EXHIBIT A



Green Tree
Mortgage Services Division
7360 South Kyrene Rd
Tempe, AZ 85283

January 6, 2004

TO: Rose Kelly
222 Clinton Ave
Renovo, PA 17764

Loan No.: 6907256223

SSN: 208361510
Mortgaged Premises:
814 LINDEN ST
Clearfield, PA 16830

FROM: Green Tree Consumer Discount Company ("Green Tree")

**HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM
YOU MAY BE ELIGIBLE FOR FINANCIAL ASSISTANCE WHICH CAN SAVE YOUR HOME FROM
FORECLOSURE AND HELP YOU MAKE FUTURE MORTGAGE PAYMENTS**

IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.

TEMPORARY STAY OF FORECLOSURE --- Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the consumer credit counseling agencies listed at the end of this Notice. **THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT", EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.**

CONSUMER CREDIT COUNSELING AGENCIES --- If you meet with one of the consumer credit counseling agencies listed at the end of this Notice, the lender may NOT take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face-to-face meeting. Advise your lender immediately of your intentions.

APPLICATION FOR MORTGAGE ASSISTANCE --- Your mortgage is in default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only



Green Tree
Mortgage Services Division
7360 South Kyrene Rd
Tempe, AZ 85283

consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application **MUST** be filed or postmarked within thirty (30) days of your face-to-face meeting.

YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.

AGENCY ACTION --- Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT. (If you have filed bankruptcy you can still apply for Emergency Mortgage Assistance.)

HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).

NATURE OF THE DEFAULT --- The MORTGAGE debt held by the above lender on your property located at: 814 LINDEN ST, Clearfield, PA 16830 IS SERIOUSLY IN DEFAULT because:

A. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following months and the following amounts are now past due: 10-Sep-03 \$291.00, 10-Oct-03 \$291.00, 10-Nov-04 \$291.00, 10-Dec-03 \$291.00, 10-Jan-04 \$291.00. Other charges (explain/itemize): Late Charges \$1,592.29, NSF Fee: \$0.00, Escrow: \$0.00, FT Taxes Advanced: \$24.50, FP-INS PRIN: \$0.00. **TOTAL AMOUNT PAST DUE: \$3,071.79.**

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable):

HOW TO CURE THE DEFAULT --- You may cure the default within **THIRTY (30) DAYS** of the date of this notice **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS , PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD.** Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to: Green Tree, 7360 South Kyrene Rd, Tempe, AZ 85283 (do not send cash). You can cure any other default by taking the following action within **THIRTY (30) DAYS** of the date of this letter: (Do not use if not applicable.)

IF YOU DO NOT CURE THE DEFAULT --- If you do not cure the default within **THIRTY (30) DAYS** of the date of this Notice, the lender intends to exercise its rights to accelerate the mortgage debt. This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within **THIRTY (30) DAYS**, the lender also intends to instruct its attorneys to start legal action to foreclose upon your mortgaged property.



Green Tree
Mortgage Services Division
7360 South Kyrene Rd
Tempe, AZ 85283

IF THE MORTGAGE IS FORECLOSED UPON — The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees actually incurred up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

OTHER LENDER REMEDIES — The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE — If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the total amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. Curing your default in the manner set forth in this notice will restore your mortgagor to the same position as if you had never defaulted.

EARLIEST POSSIBLE SHERIFF'S SALE DATE — It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be approximately one month from the date of this Notice. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

HOW TO CONTACT THE LENDER:

Name of Lender: Green Tree
Address: 7360 South Kyrene Rd, Tempe AZ 85283
Phone Number: 800-279 9416
Fax Number: 888-221-7375
Contact Person: Collection Department

EFFECT OF SHERIFF'S SALE — You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishings and other belongings could be started by the lender at any time.

ASSUMPTION OF MORTGAGE — You _____ may or X may not (CHECK ONE) sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.



Green Tree
Mortgage Services Division
7360 South Kyrene Rd
Tempe, AZ 85283

YOU MAY ALSO HAVE THE RIGHT:

- TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT, (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS.
- TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.


Enclosures: Pennsylvania Consumer Credit Counseling Agency List

Cc: Customer File

Note: This letter and all subsequent communications (written and/or oral) are issued as part of an attempt to collect a debt and any information obtained will be used for that purpose.

V E R I F I C A T I O N

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation unless designated otherwise; that he is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made 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, ESQUIRE
UDREN LAW OFFICES, P.C.

In The Court of Common Pleas of Clearfield County, Pennsylvania

GREEN TREE CONSUMER DISCOUNT COMPANY

VS.

KELLY, ROSE MARY

Sheriff Docket #

15253

04-288-CD

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW MARCH 8, 2004 CHARLES ANKEY, SHERIFF OF CLINTON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON ROSE MARY KELLY, DEFENDANT.

NOW MARCH 11, 2004 SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON ROSE MARY KELLY, DEFENDANT BY DEPUTIZING THE SHERIFF OF CLINTON COUNTY. THE RETURN OF SHERIFF ANKEY IS HERETO ATTACHED AND MADE A PART OF THIS RETURN.

NOW APRIL 12, 2004 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO ROSE MARY KELLY, DEFENDANT. "HOUSE EMPTY" AT 814 LINDEN ST., CLEARFIELD, PA.

Return Costs

Cost	Description
34.74	SHERIFF HAWKINS PAID BY: ATTY CK# 5142
20.00	SURCHARGE PAID BY: ATTY
51.20	SHERIFF OF CLINTON CO. PAID BY: ATTY

Sworn to Before Me This

12th Day Of April 2004

William A. Shaw

So Answers,

Chester A. Hawkins
My Mauley

Chester A. Hawkins

Sheriff

FILED

APR 12 2004

018:45 a.m.

William A. Shaw
Prothonotary

WAS

DATE RECEIVED

DATE PROCESSED

11253

SHERIFF'S DEPARTMENT

CLINTON COUNTY, PENNSYLVANIA

COURTHOUSE, BASEMENT, LOCK HAVEN, PA 17745

**SHERIFF SERVICE
PROCESS RECEIPT, and AFFIDAVIT OF RETURN****INSTRUCTIONS:**Print legibly, insuring readability of all copies.
Do not detach any copies. CCSD ENV.#

159-04

1. PLAINTIFF / S / Green Tree Consumer Disc. Co.		2. COURT NUMBER 04-288- CD	
3. DEFENDANT / S / Kelly, Rose Mary		4. TYPE OF WRIT OR COMPLAINT Notice & Complaint/Foreclosure	
SERVE AT	5. NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVICE OR DESCRIPTION OF PROPERTY TO BE LEVIED, ATTACHED OR SOLD. ROSE MARY KELLY		
	6. ADDRESS (Street or RFD, Apartment No., City, Boro, Twp., State and ZIP Code) 222 CLINTON ST. RENOVO, PA 17764		
7. INDICATE UNUSUAL SERVICE: <input type="checkbox"/> PERSONAL <input type="checkbox"/> PERSON IN CHARGE <input type="checkbox"/> DEPUTIZE <input type="checkbox"/> CERT. MAIL <input type="checkbox"/> REGISTERED MAIL <input type="checkbox"/> POSTED <input type="checkbox"/> OTHER			
NOW, 20, I, SHERIFF OF CLINTON 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 CLINTON 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 sheriffs' sale thereof.

9. SIGNATURE of ATTORNEY or other ORIGINATOR requesting service on behalf of: MARK UDREN		10. TELEPHONE NUMBER	11. DATE 3/09/04
SPACE BELOW FOR USE OF SHERIFF ONLY — DO NOT WRITE BELOW THIS LINE			
12. I acknowledge receipt of the writ or complaint as indicated above. SIGNATURE of Authorized CCSD Deputy or Clerk and Title CHRISTINA BILBY SECRETARY		13. Date Received 3/09/04	14. Expiration/Hearing date 4/01/04
15. I hereby CERTIFY and RETURN that I <input checked="" type="checkbox"/> have personally served, <input type="checkbox"/> have served person in charge, <input type="checkbox"/> have legal evidence of service as shown in "Remarks" (on reverse) <input type="checkbox"/> have posted the above described property with the writ or complaint described on the individual, company, corporation, etc., at the address shown above or on the individual, company, corporation, etc., at the address inserted below by handling/or Posting a TRUE and ATTESTED COPY thereof.			
16. <input type="checkbox"/> I hereby certify and return a NOT FOUND because I am unable to locate the individual, company, corporation, etc., named above. (See remarks below)			
17. Name and title of individual served Rose Mary Kelly		18. A person of suitable age and discretion then residing in the defendant's usual place of abode. <input type="checkbox"/>	Read Order <input type="checkbox"/>
19. Address of where served (complete only if different than shown above) (Street or RFD, Apartment No., City, Boro, Twp., State and ZIP Code)		20. Date of Service 3/11/04	21. Time 2:45 PM
22. ATTEMPTS	Date	Miles	Dep. Int.
23. Advance Costs	24.	25.	26.
27. Total Costs		28. COST DUE OR REFUND	

AFFIRMED and subscribed to before me this

16th

day of

March

20 04

SO ANSWER.

By (Sheriff/Dep. Sheriff) (Please Print or Type)

CHARLES R. ANKNEY

Signature of Sheriff

Charles R. Ankney

SHERIFF OF CLINTON COUNTY

Date

Date

3/16/04

MY COMMISSION EXPIRES

Christina M. Bilby, NOTARY PUBLIC

City of Lock Haven, Clinton County, Penna.

My Commission Expires December 4, 2007

I ACKNOWLEDGE RECEIPT OF THE SHERIFF'S RETURN SIGNATURE OF AUTHORIZED PERSON

39. Date Received

PROTHONOTARY

SHERIFF'S RETURN OF SERVICE

- () (1) The within _____
upon _____, the within named
defendant by mailing to _____
by _____ mail, return receipt requested, postage
prepaid, _____ on the _____
a true and attested copy thereof at _____

ROSE MARY KELLY

The return receipt signed by _____
defendant on the _____ is hereto attached and
made a part of this return.

- () (2) Outside the Commonwealth, pursuant to Pa. RCP.405 (c) (1) (2), by mailing a true and
attested copy thereof at _____

in the following manner:

- () (a) To the defendant by () registered () certified mail, return receipt requested,
postage prepaid, addressee only on the _____
said receipt being returned NOT signed by defendant, but with a notation by the
Postal Authorities that Defendant refused to accept the same. The returned
receipt and envelope is attached hereto and made part of this return.

And thereafter:

- () (b) To the defendant by ordinary mail addressed to defendant at same address, with
the return address of the Sheriff appearing thereon, on the _____

I further certify that after fifteen (15) days from the mailing date, I have not
received said envelope back from the Postal Authorities. A certificate of mailing
is hereto attached as a proof of mailing.

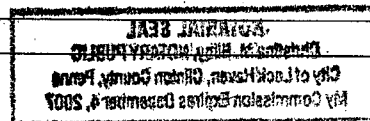
- () (3) By publication in the Lock Haven Express, a weekly publication of general circulation
in the County of Clinton, Commonwealth of Pennsylvania, one time with publication
appearing _____

The affidavit from said Lock Haven Express is hereto attached.

- () (4) By mailing to _____
by _____ mail, return receipt requested, postage prepaid,
_____ on the _____
a true and attested copy thereof at _____

The _____ returned by the Postal
Authorities marked _____
is hereto attached.

- () (5) Other _____





CHESTER A. HAWKINS
SHERIFF

Sheriff's Office Clearfield County

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

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 15253

GREEN TREE CONSUMER DISC. CO.

TERM & NO. 04-288-CD

VS

DOCUMENT TO BE SERVED:

COMPLAINT IN MORTGAGE FORECLOSURE

ROSE MARY KELLY

SERVE BY: 03/31/2004

MAKE REFUND PAYABLE TO: UDREN LAW OFFICE

SERVE: ROSE MARY KELLY

ADDRESS: 222 CLINTON AVE., RENOVO, PA. 17764

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
CLINTON COUNTY, Pennsylvania to execute this writ. This
Deputation being made at the request and risk of the Plaintiff this 8th Day of
MARCH 2004

Respectfully,


CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY

WE HEREBY CERTIFY THE
WITHIN TO BE A TRUE AND
CORRECT COPY OF THE ORIGINAL ATTORNEY FOR PLAINTIFF

UDREN LAW OFFICES, BY: Mark J. Udren, Esquire

ATTY I.D. NO. 04302

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-482-6900

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

Plaintiff

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant (s)

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

NO. 04-288-2

COMPLAINT IN MORTGAGE FORECLOSURE

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

David S. Meholick
Court Administrator
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.

MAR 01 2004

Attest.

William L. 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.

**David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 482-6900**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: N/A

Assignments of Record to: N/A

Recording Date: N/A

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 814 Linden Street

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Clearfield

COUNTY: Clearfield

DATE EXECUTED: 04/26/00

DATE RECORDED: 05/02/00 INSTR NO.: 200005955

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

(a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated

below;

- (b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 02/10/04:

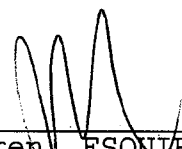
Principal of debt due	\$48,908.71
Unpaid Interest at 11.51% from 08/10/03 to 02/10/04 (the per diem interest accruing on this debt is \$9.67 and that sum should be added each day after 02/10/04)	1,739.87
Title Report	250.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$58.18 should be added in accordance with the terms of the note each month after 02/10/04)	1,621.39
Deferred Interest	2,610.54
Inspection Fee	24.50
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,445.44</u>
TOTAL	\$57,880.45

7. The attorney's fee 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 in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time

limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$57,880.45 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
Attorney for Plaintiff
Attorney I.D. No. 04302

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE STATE OF PENNSYLVANIA,
COUNTY OF CLEARFIELD, BOROUGH OF CLEARFIELD, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POST ON THE CORNER OF LOT NO. 7, FORMERLY OF IRA JAY; THENCE ALONG
THE LINE OF LOT NO. 7 IN AN EASTERLY DIRECTION A DISTANCE OF 170 FEET TO AN ALLEY;
THENCE ALONG SAID ALLEY IN A NORTHERLY DIRECTION A DISTANCE OF 50 FEET TO THE
CORNER OF LOT NO. 9, FORMERLY OWNED BY W. G. KELLEY; THENCE IN A WESTERLY DIRECTION
ALONG THE LINE OF LOT NO. 9, A DISTANCE OF 170 FEET TO LINDEN STREET; THENCE ALONG
LINDEN STREET IN A SOUTHERLY DIRECTION 50 FEET TO A POINT AND PLACE OF BEGINNING.
BEING KNOWN AS LOT NO. 8 IN BLOCK B OF THE G. L. REED ADDITION TO THE BOROUGH OF
CLEARFIELD, A PLOT OF PLAN OF WHICH IS RECORDED IN CLEARFIELD COUNTY IN
MISCELLANEOUS BOOK "U", PAGE 155.

BEING KNOWN AS: 814 LINDEN STREET, CLEARFIELD, PA

TAX PARCEL NO. 4.2-K08-237-54



Green Tree
Mortgage Services Division
7360 South Kyrene Rd
Tempe, AZ 85283

Date of Notice: January 6, 2004

Rose Kelly
222 Clinton Ave
Renovo, PA 17764

CERTIFIED NUMBER: 70001530000098199503

ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDITAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

EXHIBIT A



Green Tree
Mortgage Services Division
7360 South Kyrene Rd
Tempe, AZ 85283

January 6, 2004

TO: Rose Kelly
222 Clinton Ave
Renovo, PA 17764

Loan No.: 6907256223

SSN: 208361510
Mortgaged Premises:
814 LINDEN ST
Clearfield, PA 16830

FROM: Green Tree Consumer Discount Company ("Green Tree")

**HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM
YOU MAY BE ELIGIBLE FOR FINANCIAL ASSISTANCE WHICH CAN SAVE YOUR HOME FROM
FORECLOSURE AND HELP YOU MAKE FUTURE MORTGAGE PAYMENTS**

IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.

TEMPORARY STAY OF FORECLOSURE --- Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the consumer credit counseling agencies listed at the end of this Notice. **THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT", EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.**

CONSUMER CREDIT COUNSELING AGENCIES --- If you meet with one of the consumer credit counseling agencies listed at the end of this Notice, the lender may NOT take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face-to-face meeting. Advise your lender immediately of your intentions.

APPLICATION FOR MORTGAGE ASSISTANCE --- Your mortgage is in default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only



Green Tree
Mortgage Services Division
7360 South Kyrene Rd
Tempe, AZ 85283

consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application **MUST** be filed or postmarked within thirty (30) days of your face-to-face meeting.

YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.

AGENCY ACTION --- Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT. (If you have filed bankruptcy you can still apply for Emergency Mortgage Assistance.)

HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).

NATURE OF THE DEFAULT --- The MORTGAGE debt held by the above lender on your property located at: 814 LINDEN ST, Clearfield, PA 16830 IS SERIOUSLY IN DEFAULT because:

A. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following months and the following amounts are now past due: 10-Sep-03 \$291.00, 10-Oct-03 \$291.00, 10-Nov-04 \$291.00, 10-Dec-03 \$291.00, 10-Jan-04 \$291.00. Other charges (explain/itemize): Late Charges \$1,592.29, NSF Fee: \$0.00, Escrow: \$0.00, FT Taxes Advanced: \$24.50, FP-INS PRIN: \$0.00. **TOTAL AMOUNT PAST DUE: \$3,071.79.**

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable):

HOW TO CURE THE DEFAULT --- You may cure the default within **THIRTY (30) DAYS** of the date of this notice **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS , PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD.** Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to: Green Tree, 7360 South Kyrene Rd, Tempe, AZ 85283 (do not send cash). You can cure any other default by taking the following action within **THIRTY (30) DAYS** of the date of this letter: (Do not use if not applicable.)

IF YOU DO NOT CURE THE DEFAULT --- If you do not cure the default within **THIRTY (30) DAYS** of the date of this Notice, the lender intends to exercise its rights to accelerate the mortgage debt. This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within **THIRTY (30) DAYS**, the lender also intends to instruct its attorneys to start legal action to foreclose upon your mortgaged property.



Green Tree
Mortgage Services Division
7360 South Kyrene Rd
Tempe, AZ 85283

IF THE MORTGAGE IS FORECLOSED UPON — The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees actually incurred up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

OTHER LENDER REMEDIES — The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE — If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the total amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. Curing your default in the manner set forth in this notice will restore your mortgagor to the same position as if you had never defaulted.

EARLIEST POSSIBLE SHERIFF'S SALE DATE — It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be approximately one month from the date of this Notice. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

HOW TO CONTACT THE LENDER:

Name of Lender: Green Tree
Address: 7360 South Kyrene Rd, Tempe AZ 85283
Phone Number: 800-279 9416
Fax Number: 888-221-7375
Contact Person: Collection Department

EFFECT OF SHERIFF'S SALE — You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishings and other belongings could be started by the lender at any time.

ASSUMPTION OF MORTGAGE — You _____ may or X may not (CHECK ONE) sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.



Green Tree
Mortgage Services Division
7360 South Kyrene Rd
Tempe, AZ 85283

YOU MAY ALSO HAVE THE RIGHT:

- TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT, (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS.
- TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.


Enclosures: Pennsylvania Consumer Credit Counseling Agency List

Cc: Customer File

Note: This letter and all subsequent communications (written and/or oral) are issued as part of an attempt to collect a debt and any information obtained will be used for that purpose.

V E R I F I C A T I O N

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation unless designated otherwise; that he is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made 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, ESQUIRE
UDREN LAW OFFICES, P.C.

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

Plaintiff

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 04-288-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE SHERIFF:

Issue Writ of Execution in the above matter:

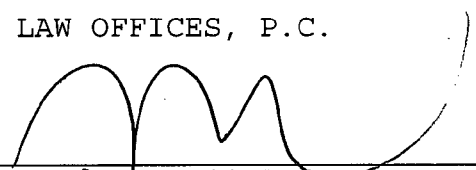
Amount due \$58,693.21

Interest From 4/17/04
to Date of Sale _____
Per diem @\$9.67

(Costs to be added)

\$ _____
125.00 Prothonotary
costs

UDREN LAW OFFICES, P.C.



Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

FILED

APR 19 2004

William A. Shaw
Prothonotary/Clerk of Courts

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO.04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

Plaintiff

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 04-288-CD

CERTIFICATE TO THE SHERIFF

I HEREBY CERTIFY THAT:

I. The judgment entered in the above matter is based on an Action:

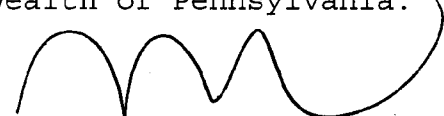
- ☐ A. In Assumpsit (Contract)
- ☐ B. In Trespass (Accident)
- ☒ C. In Mortgage Foreclosure
- ☐ D. On a Note accompanying a purchase money mortgage and the property being exposed to sale is the mortgaged property.

II. The Defendant(s) own the property being exposed to sale as:

- ☒ A. An individual
- ☐ B. Tenants by Entireties
- ☐ C. Joint Tenants with right of survivorship
- ☐ D. A partnership
- ☐ E. Tenants in Common
- ☐ F. A corporation

III. The Defendant(s) is (are):

- ☒ A. Resident in the Commonwealth of Pennsylvania
- ☐ B. Not resident in the Commonwealth of Pennsylvania
- ☐ C. If more than one Defendant and either A or B above is not applicable, state which Defendant is resident of the Commonwealth of Pennsylvania.
Resident:


Mark J. Udren, ESQUIRE
Address & I.D. # as above

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

Plaintiff

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Rose Mary Kelly
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Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 04-288-CD

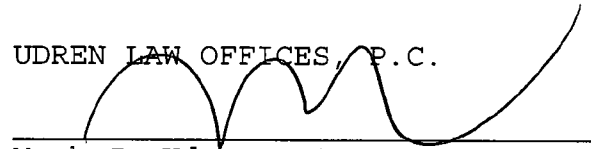
C E R T I F I C A T E

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff in the above-captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

- () An FHA insured mortgage
- () Non-owner occupied
- () Vacant
- (X) Act 91 procedures have been fulfilled.
- () Over 24 months delinquent.

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

UDREN LAW OFFICES, P.C.


Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

Plaintiff

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

NO. 04-288-CD

Defendant(s)

AFFIDAVIT PURSUANT TO RULE 3129.1

Green Tree Consumer Discount Company, f/k/a Conseco Finance Consumer Discount Company, Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at: 814 Linden Street, Clearfield, PA 16830

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

Rose Mary Kelly 222 Clinton Avenue
Renovo, PA 17764

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

SAME AS #1 ABOVE

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

None

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

Name

Address

Plaintiff herein.

See Caption above.

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

Name

Address

None

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

Name

Address

Real Estate Tax Dept.

1 North Second Street, Ste. 116
Clearfield, PA 16380

Domestic Relations Section

1 North Second Street, Ste. 116
Clearfield, PA 16380

Commonwealth of PA,
Department of Revenue

Bureau of Compliance, Dept. 280946
Harrisburg, PA 17128-0946

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

Name

Address

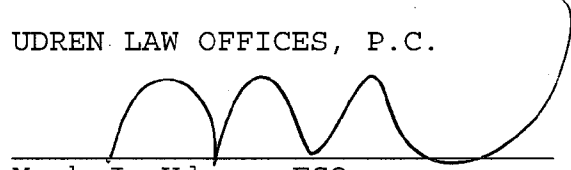
Tenants/Occupants

814 Linden Street
Clearfield, PA 16830

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

UDREN LAW OFFICES, P.C.

DATED: April 16, 2004


Mark J. Udren, ESQ.
Attorney for Plaintiff

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

COPY

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

Plaintiff

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

NO. 04-288-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

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

814 Linden Street
Clearfield, PA 16830
SEE LEGAL DESCRIPTION ATTACHED

Amount due

\$58,693.21

Interest From 4/17/04
to Date of Sale _____
Per diem @\$9.67

(Costs to be added)

\$ _____
Prothonotary *125.00 Prothonotary costs*

By _____
Clerk

Date 4/19/04

COURT OF COMMON PLEAS

NO. 04-288-CD

=====

Green Tree Consumer Discount
Company, f/k/a Conseco Finance Consumer
Discount Company

vs.

Rose Mary Kelly

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 58,693.21

INTEREST \$

from 4/17/04 to

Date of Sale

Per diem @\$9.67

COSTS PAID:

PROTHY \$ 125.00

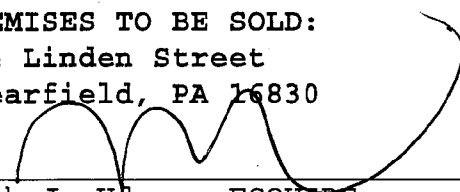
SHERIFF \$

STATUTORY \$

COSTS DUE PROTHY. \$

PREMISES TO BE SOLD:

814 Linden Street
Clearfield, PA 16830


Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 482-6900

7

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE STATE OF PENNSYLVANIA,
COUNTY OF CLEARFIELD, BOROUGH OF CLEARFIELD, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POST ON THE CORNER OF LOT NO. 7, FORMERLY OF IRA JAY; THENCE ALONG
THE LINE OF LOT NO. 7 IN AN EASTERLY DIRECTION A DISTANCE OF 170 FEET TO AN ALLEY;
THENCE ALONG SAID ALLEY IN A NORTHERLY DIRECTION A DISTANCE OF 50 FEET TO THE
CORNER OF LOT NO. 9, FORMERLY OWNED BY W. G. KELLEY; THENCE IN A WESTERLY DIRECTION
ALONG THE LINE OF LOT NO. 9, A DISTANCE OF 170 FEET TO LINDEN STREET; THENCE ALONG
LINDEN STREET IN A SOUTHERLY DIRECTION 50 FEET TO A POINT AND PLACE OF BEGINNING.
BEING KNOWN AS LOT NO. 8 IN BLOCK B OF THE G. L. REED ADDITION TO THE BOROUGH OF
CLEARFIELD, A PLOT OF PLAN OF WHICH IS RECORDED IN CLEARFIELD COUNTY IN
MISCELLANEOUS BOOK "U", PAGE 155.

BEING KNOWN AS: 814 LINDEN STREET, CLEARFIELD, PA

TAX PARCEL NO. 4.2-K08-237-54

BEING KNOWN AS 814 LINDEN STREET, CLEARFIELD, PA 16830

PROPERTY ID NO: 4.2-K08-237-54

TITLE TO SAID PREMISES IS VESTED IN ROSE MARY KELLY BY DEED FROM
THE UNITED STATES OF AMERICA, ACTING THROUGH THE FARMERS HOME
ADMINSTRATION, UNITED STATES DEPARTMENT OF AGRICULTURE, DATED
5/16/88, RECORDED 5/27/88, IN DEED BOOK 1224, PAGE 331.

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

Plaintiff

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 04-288-CD

FILED

APR 19 2004

William A. Shaw
Prothonotary/Clerk of Courts

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

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) **Rose Mary Kelly** for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$57,880.45
Interest Per Complaint	638.22
From 2/11/04 to 4/16/04	
Late charges per Complaint	<u>174.54</u>
From 2/11/04 to 4/16/04	

TOTAL \$58,693.21

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

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: 4/19/04

William A. Shaw
PRO PROTHY

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003
856-482-6900

Green Tree Consumer Discount Company,
f/k/a Conseco Finance Consumer
Discount Company
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

Rose Mary Kelly
Defendant(s)

NO. 04-288-CD

TO: Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

DATE of Notice: April 5, 2004

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
David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982

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 INMEDIATAMENTE 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.

SERVICIO DE REFERENCIA LEGAL
LAWYER REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982

NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

/s/
Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, New Jersey 08003-3620

UDREN LAW OFFICES, P.C.
BY: MARK J. UDREN, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

Plaintiff

v.
Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 04-288-CD

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF NEW JERSEY

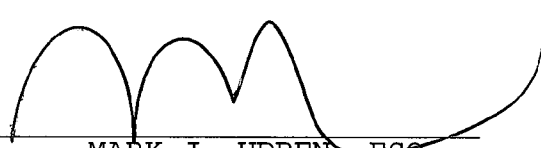
:
:
: SS

COUNTY OF CAMDEN

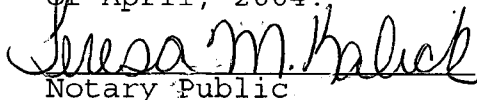
THE UNDERSIGNED being duly sworn, deposes and says that the averments herein are based upon investigations made and records maintained by us either as Plaintiff or as servicing agent of the Plaintiff herein and that the above Defendant(s) are not in the Military or Naval Service of the United States 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: Rose Mary Kelly
Age: Over 18
Residence: As captioned above
Employment: Unknown

Defendant: Rose Mary Kelly
Age: Over 18
Residence: As captioned above
Employment: Unknown

Name:  MARK J. UDREN, ESQ.
Title: ATTORNEY FOR PLAINTIFF
Company: UDREN LAW OFFICES, P.C.

Sworn to and subscribed
before me this 16th day
of April, 2004.


Notary Public

TERESA M. KALICK
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 4/10/2008

FILED

Atty pd

M 11:41 AM

2000

APR 19 2004

APCC

William A. Shaw
Prothonotary/Clerk of Courts

Notice and copy of

First pg. of Judgment (Principles)
to Def.

Statement to Atty

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

Plaintiff

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

NO. 04-288-CD

Defendant(s)

TO: Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

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

- ☒ 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 Mark J. Udren, Esquire

At this telephone number: 856-482-6900

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

COPY

Green Tree Consumer Discount Company
Plaintiff(s)

No.: 2004-00288-CD

Real Debt: \$58,693.21

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Rose Mary Kelly
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: April 19, 2004

Expires: April 19, 2009

Certified from the record this 19th day of April, 2004.

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

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

Plaintiff

NO. 04-288-CD

v.
Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

PRAECIPE TO FILE PROOF OF SERVICE

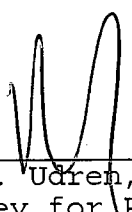
TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to
the captioned matter.

UDREN LAW OFFICES, P.C.


Date: June 30, 2004

BY:


Mark J. Udren, ESQUIRE
Attorney for Plaintiff

FILED

JUL 09 2004

 William A. Shaw

Prothonotary/Clerk of Courts

1 copy to Mr. [unclear]

Green Tree Consumer Discount Company, et. al., Plaintiff(s)
vs.
Rose Mary Kelly, et. al., Defendant(s)



Service of Process by
APS International, Ltd.
1-800-328-7171

APS International Plaza
7800 Glenroy Rd.
Minneapolis, MN 55439-3122

AFFIDAVIT OF SERVICE -- Individual

UDREN LAW OFFICES, P.C.
Ms. Jodie L. Boos
111 Woodcrest Road
Suite 200
Cherry Hill, NJ 08003-3620

Service of Process on:

—Rose Mary Kelly
Court Case No. 04-288-CD

State of: Pennsylvania) ss.
County of: Clinton)

Name of Server: Robert E. Barnes, undersigned, being duly sworn, deposes and says
that at the time of service, s/he was over the age of twenty-one, was not a party to this action;

Date/Time of Service: that on the 21st day of June, 20 04, at 4:15 o'clock P M

Place of Service: at 222 Clinton Avenue, in Renovo, PA 17764

Documents Served: the undersigned served the documents described as:
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:
Rose Mary Kelly

Person Served, and
Method of Service:

- ☐ By personally delivering them into the hands of the person to be served.
- ☒ By delivering them into the hands of Robert Kelly, a person of
suitable age and discretion residing at the Place of Service,
whose relationship to the person to be served is Son

Description of Person
Receiving Documents: The person receiving documents is described as follows:
Sex m; Skin Color white; Hair Color Red; Facial Hair Yes - Red
Approx. Age 35; Approx. Height 6'6"; Approx. Weight 285
☒ To the best of my knowledge and belief, said person was not engaged in the US Military at
the time of service.

Signature of Server: Undersigned declares under penalty of perjury
that the foregoing is true and correct.

Subscribed and sworn to before me this

Robert E. Barnes 6/23/04
Signature of Server (Date)

23 day of June, 2004
Pamela E. Shultz
Notary Public (Commission Expires)

APS International, Ltd.

APS File #: 066569-0001

Notarial Seal
Pamela E. Shultz, Notary Public
Loyalsock Twp., Lycoming County
My Commission Expires Apr. 9, 2006
Member, Pennsylvania Association Of Notaries

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

BY: Mark J. Udren

ATTY I.D. NO. 04302

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400

Green Tree Consumer Discount : COURT OF COMMON PLEAS
Company, f/k/a Conseco Finance : CIVIL DIVISION
Consumer Discount Company : Clearfield County
7360 South Kyrene Road :
Tempe, AZ 85283 :

Plaintiff

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

NO. 04-288-CD

FILED

JUL 23 2004

William A. Shaw

Prothonotary/Clerk of Courts

AFFIDAVIT OF SERVICE PURSUANT TO Pa.R.C.P. RULE 3129.1

Plaintiff, by its/his/her Attorney, Mark J. Udren, Esquire, hereby verifies that:

1. A copy of the Notice of Sheriff's Sale, a true and correct copy of which is attached hereto as Exhibit "A", was sent to every recorded lienholder and every other interested party known as of the date of the filing of the Praecipe for the Writ of Execution, on the date(s) appearing on the attached Certificates of Mailing.

2. A Notice of Sheriff's Sale was sent to Defendant(s) by regular mail and certified mail on the date appearing on the attached Return Receipt, which was signed for by Defendant(s) on the date specified on the said Return Receipt. Copies of the said Notice and Return Receipt are attached hereto as Exhibit "B".

3. If a Return Receipt is not attached hereto, then service was by personal service on the date specified on the attached Return of Service, attached hereto as Exhibit "B".

4. If service was by Order of Court, then proof of compliance with said Order is attached hereto as Exhibit "B".

All Notices were served within the time limits set forth by Pa Rule C.P. 3129.

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

Dated: July 7, 2004

UDREN LAW OFFICES, P.C.

BY:

Mark J. Udren, Esquire
Attorney for Plaintiff

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

BY: Mark J. Udren, Esquire

ATTY I.D. NO. 04302

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 04-288-CD

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

DATE: June 3, 2004

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

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

OWNER(S): Rose Mary Kelly

PROPERTY: 814 Linden Street
Clearfield, PA 16830

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on August 6, 2004, at 10:00 am, in the Clearfield County Courthouse, 1 North Second Street, Suite 116, Clearfield, PA 16830. Our records indicate that you may hold a mortgage or judgment on the property which will be extinguished by the sale. You may wish to attend the sale to protect your interests.

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

EXHIBIT A

Name and Address of Sender

Udren Law Offices PC
Woodcrest Corporate Center
111 Woodcrest Road
Cherry Hill, NJ 08003

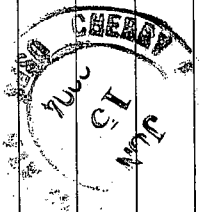
☐ Registered
☐ Insured
☐ COD
☐ Certified
☐ Return Receipt for Merchandise
☐ Int'l Recorded Del.
☐ Express Mail

Check appropriate block for Registered Mail:
☐ With Postal Insurance
☐ Without postal insurance

Affix stamp here if issued as certificate of mailing or for additional copies of this bill.

Postmark and Date of Receipt

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge	Act. Value (If Regs.)	Insured Value	Due Sender If COD	R.R. Fee	S.D. Fee	S.H. Fee	Rst. Del. Fee
1	Kelly	Real Estate Tax Dept., 1 N. Second St., Ste 116 Clearfield, PA 16380										
2	04020270	Domestic Relations Section, 1 N. Second St., Ste 116 Clearfield, PA 16380										
3	Clearfield	Commonwealth of PA, Dept. of Revenue, Bureau of Compliance, Dept. 280946, Harrisburg, PA 17128-0946										
4	Jodie	Tenants/Occupants, 814 Linden St., Clearfield, PA 16380										
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												
Total number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)		The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to third and fourth class parcels.							



UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

Plaintiff

NO. 04-288-CD

v.
Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

PRAECIPE TO FILE PROOF OF SERVICE

TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to
the captioned matter.

UDREN LAW OFFICES, P.C.

Date: June 30, 2004

BY:

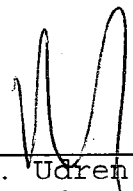

Mark J. Udren, ESQUIRE
Attorney for Plaintiff

EXHIBIT 3

Green Tree Consumer Discount Company, et. al., Plaintiff(s)
vs.
Rose Mary Kelly, et. al., Defendant(s)



Service of Process by
APS International, Ltd.
1-800-328-7171

APS International Plaza
7800 Glenroy Rd.
Minneapolis, MN 55439-3122

AFFIDAVIT OF SERVICE -- Individual

Service of Process on:

—Rose Mary Kelly
Court Case No. 04-288-CD

UDREN LAW OFFICES, P.C.

Ms. Jodie L. Boos

111 Woodcrest Road
Suite 200

Cherry Hill, NJ 08003-3620

State of: Pennsylvania) ss.

County of: Clinton

Name of Server: Robert E Barnes, undersigned, being duly sworn, deposes and says that at the time of service, s/he was over the age of twenty-one, was not a party to this action;

Date/Time of Service: that on the 21st day of June, 20 04, at 4:15 o'clock P M

Place of Service: at 222 Clinton Avenue, in Renovo, PA 17764

Documents Served: the undersigned served the documents described as:
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:
Rose Mary Kelly

Person Served, and
Method of Service:

- ☐ By personally delivering them into the hands of the person to be served.
- ☒ By delivering them into the hands of Robert Kelly, a person of suitable age and discretion residing at the Place of Service, whose relationship to the person to be served is Son

Description of Person
Receiving Documents:

The person receiving documents is described as follows:

Sex m; Skin Color W; Hair Color Red; Facial Hair Yes - Red
Approx. Age 35; Approx. Height 6'6"; Approx. Weight 285

☒ To the best of my knowledge and belief, said person was not engaged in the US Military at the time of service.

Signature of Server:

Undersigned declares under penalty of perjury that the foregoing is true and correct.

Robert E Barnes 6/23/04

Signature of Server

(Date)

Subscribed and sworn to before me this

23 day of June, 2004

Pamela E. Shultz

Notary Public

(Commission Expires)

APS International, Ltd.

APS File #: 066569-0001

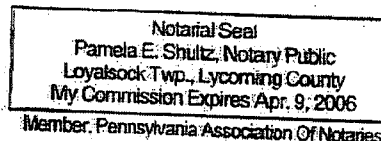


EXHIBIT B

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 15609

GREEN TREE CONSUMER DISCOUNT COMPANY F/K/A CONSECO FINANC 04-288-CD

VS.

KELLY, ROSE MARY

WRIT OF EXECUTION

REAL ESTATE

FILED
d11:236H
SEP 02 2004

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF RETURNS

NOW, MAY 27, 2004 @ 8:25 A.M. O'CLOCK A LEVY WAS TAKEN ON THE PROPERTY OF THE DEFENDANT. THE PROPERTY WAS ALSO POSTED THIS DATE @ 8:26 A.M. O'CLOCK.

A SALE DATE OF AUGUST 6, 2004 WAS SET.

NOW, JUNE 21, 2004 @ 4:15 P.M. THE ATTORNEY HAD A PROCESS SERVER PERSONALLY SERVE ROSE MARY KELLY AT 222 CLINTON AVENUE, RENOVO, PENNSYLVANIA.

NOW, JUNE 10, 2004 ROSE MARY KELLY WAS SERVED BY REGULAR AND CERTIFIED MAIL AT 222 CLINTON AVENUE, RENOVO, PENNSYLVANIA SIGNED FOR BY ROSE MARY KELLY, DEFENDANT, WITH NOTICE OF SALE, WRIT OF EXECUTION, AND COPY OF THE LEVY. CERTIFIED #70033110000193809865

NOW, AUGUST 6, 2004 A SALE WAS HELD ON THE PROPERTY OF THE DEFENDANT. THE PROPERTY WAS PURCHASED BY WILLIAM M. HAND AND VIRGINIA GAIL HAND OF 802 DOREY STREET, CLEARFIELD, PENNSYLVANIA 16830 FOR \$27,500.00 + COSTS

NOW, AUGUST 6, 2004 RECEIVED A CHECK FOR 10% OF THE BID FROM WILLIAM M. HAND AND VIRGINIA GAIL HAND 2,750.00. CHECK #8367 CNB.

NOW, AUGUST 16, 2004 BILLED WILLIAM M. HAND AND VIRGINIA GAIL HAND, 802 DOREY STREET, CLEARFIELD, PENNSYLVANIA FOR \$31,224.70 AMOUNT DUE ON SALE.

NOW, AUGUST 18, 2004 RECEIVED A CHECK #101 FROM WILLIAM M. HAND AND VIRGINIA GAIL HAND FOR BALANCE OF SALE \$31,224.70 CHECK #101 CNB

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 15609

GREEN TREE CONSUMER DISCOUNT COMPANY F/K/A CONSECO FINANC 04-288-CD

VS.

KELLY, ROSE MARY

WRIT OF EXECUTION

REAL ESTATE

SHERIFF RETURNS

NOW, AUGUST 31, 2004 PAID BILLS FROM THE 10% DEPOSIT AND CHECK FOR
BALANCE DUE FROM WILLIAM M. HAND AND VIRGINIA GAIL HAND.

NOW, SEPTEMBER 2, 2004 RETURN WRIT AS A SALE BEING HELD ON THE
PROPERTY OF THE DEFENDANT. THE PROPERTY WAS PURCHASED BY WILLIAM M.
HAND AND VIRGINIA GAIL HAND FOR \$27,500.00 + COSTS.

NOW, SEPTEMBER 2, 2004 A DEED WAS FILED.

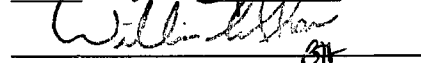
SHERIFF HAWKINS \$741.69

SURCHARGE \$20.00

PAID BY ATTORNEY

Sworn to Before Me This

2nd Day Of September 2004



WILLIAM A. SHAW

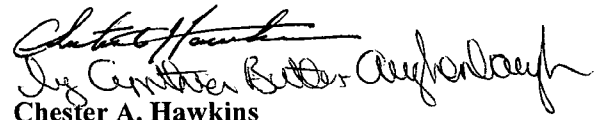
Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

So Answers,



Chester A. Hawkins

Sheriff

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

Green Tree Consumer Discount
Company, f/k/a Conseco Finance
Consumer Discount Company
7360 South Kyrene Road
Tempe, AZ 85283

Plaintiff

v.

Rose Mary Kelly
222 Clinton Avenue
Renovo, PA 17764

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 04-288-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

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

814 Linden Street
Clearfield, PA 16830
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$58,693.21

Interest From 4/17/04
to Date of Sale _____
Per diem @\$9.67

(Costs to be added)

\$ _____ 125.00 Prothonotary costs

Received April 19, 2004 @ 3:15 PM.
Chester A. Hawkins
By Cynthia Butler-Aughenbaugh

By

Willi L. L...
Prothonotary

Clerk

Date 4/19/04

COURT OF COMMON PLEAS
NO. 04-288-CD

=====

Green Tree Consumer Discount
Company, f/k/a Conseco Finance Consumer
Discount Company
vs.
Rose Mary Kelly

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 58,693.21

INTEREST \$ _____
from 4/17/04 to _____
Date of Sale _____
Per diem @\$9.67

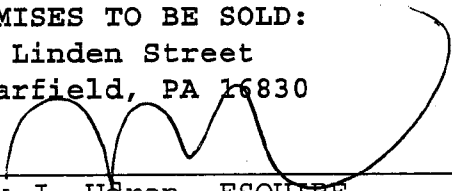
COSTS PAID:
PROTHY \$ 125.00

SHERIFF \$ _____

STATUTORY \$ _____

COSTS DUE PROTHY. \$ _____

PREMISES TO BE SOLD:
814 Linden Street
Clearfield, PA 16830



Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 482-6900

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE STATE OF PENNSYLVANIA,
COUNTY OF CLEARFIELD, BOROUGH OF CLEARFIELD, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POST ON THE CORNER OF LOT NO. 7, FORMERLY OF IRA JAY; THENCE ALONG
THE LINE OF LOT NO. 7 IN AN EASTERLY DIRECTION A DISTANCE OF 170 FEET TO AN ALLEY;
THENCE ALONG SAID ALLEY IN A NORTHERLY DIRECTION A DISTANCE OF 50 FEET TO THE
CORNER OF LOT NO. 9, FORMERLY OWNED BY W. G. KELLEY; THENCE IN A WESTERLY DIRECTION
ALONG THE LINE OF LOT NO. 9, A DISTANCE OF 170 FEET TO LINDEN STREET; THENCE ALONG
LINDEN STREET IN A SOUTHERLY DIRECTION 50 FEET TO A POINT AND PLACE OF BEGINNING.
BEING KNOWN AS LOT NO. 8 IN BLOCK B OF THE G. L. REED ADDITION TO THE BOROUGH OF
CLEARFIELD, A PLOT OF PLAN OF WHICH IS RECORDED IN CLEARFIELD COUNTY IN
MISCELLANEOUS BOOK "U", PAGE 155.

BEING KNOWN AS: 814 LINDEN STREET, CLEARFIELD, PA

TAX PARCEL NO. 4.2-K08-237-54

BEING KNOWN AS 814 LINDEN STREET, CLEARFIELD, PA 16830

PROPERTY ID NO: 4.2-K08-237-54

TITLE TO SAID PREMISES IS VESTED IN ROSE MARY KELLY BY DEED FROM
THE UNITED STATES OF AMERICA, ACTING THROUGH THE FARMERS HOME
ADMINISTRATION, UNITED STATES DEPARTMENT OF AGRICULTURE, DATED
5/16/88, RECORDED 5/27/88, IN DEED BOOK 1224, PAGE 331.

REAL ESTATE SALE SCHEDULE OF DISTRIBUTION

NAME KELLY NO. 04-288-CD

NOW, August 6, 2004, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on the 6TH day of AUGUST 2004, I exposed the within described real estate of ROSE MARY KELLY to public venue or outcry at which time and place I sold the same to GREEN TREE CONSUMER DISCOUNT COMPANY, F/K/A CONSECO FINANCE CONSUMER DISCOUNT COMPANY he/she being the highest bidder, for the sum of \$27,500.00 + COSTS and made the following appropriations, viz:

SHERIFF COSTS:

RDR	15.00
SERVICE	15.00
MILEAGE	
LEVY	15.00
MILEAGE	2.00
POSTING	15.00
CSDS	10.00
COMMISSION 2%	550.00
POSTAGE	9.69
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	27,500.00
RETURNS/DEPUTIZE	
COPIES/BILLING	15.00
	5.00
BILLING/PHONE/FAX	5.00
TOTAL SHERIFF COSTS	741.69

DEED COSTS:

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	29.50
TRANSFER TAX 2%	1,063.72
TOTAL DEED COSTS	1,093.22

PLAINTIFF COSTS, DEBT & INTEREST:

DEBT-AMOUNT DUE	58,693.21
INTEREST FROM 4/17/04 @9.67	
TO BE ADDED TO SALE DATE	
ATTORNEY FEES	
PROTH. SATISFACTION	
LATE CHARGES & FEES	
COST OF SUIT -TO BE ADDED	
FORECLOSURE FEES/ESCROW DEFICIT	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	20.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
TOTAL DEBT & INTEREST	58,713.21

COSTS:

ADVERTISING	369.60
TAXES - collector	1,123.00
TAXES - tax claim TO SEP	2,674.39
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	1,093.22
SHERIFF COSTS	741.69
LEGAL JOURNAL AD	144.00
PROTHONOTARY	125.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	

TOTAL COSTS 6,415.90

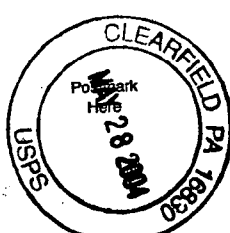
DISTRIBUTION WILL BE MADE IN ACCORDANCE WITH THE ABOVE SCHEDULE UNLESS EXCEPTIONS ARE FILED WITH THIS OFFICE **WITHIN TEN (10) DAYS FROM THIS DATE.**

CHESTER A. HAWKINS, Sheriff

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>A. Signature <i>x Rose M. Kelly</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>Rose Mary Kelly 222 Clinton Avenue Renovo, PA 17764</p>		<p>B. Received by (Printed Name) <i>Rose M. Kelly</i> C. Date of Delivery <i>6-10-04</i></p>	
<p>2. Article Number (Transfer from service label)</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, August 2001</p>		<p>7003 3110 0001 9300 9865</p>	
<p>Domestic Return Receipt</p>		<p>102595-02-M-1540</p>	

7003 3110 0001 9300 9865

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage \$	60
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	465



Sent To	Rose Mary Kelly
Street, Apt. No., or PO Box No.	222 Clinton Avenue
City, State, ZIP+4	Renovo, PA 17764

PS Form 3800, June 2002 See Reverse for Instructions