

04-535-CD  
FEDERAL NATIONAL MORTGAGE vs. MICHAEL SHIREY et al  
ASSOCIATION

Federal National Mort. Vs Michael Shirey  
2004-535-CD

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 15838  
NO: 04-535-CD

PLAINTIFF: FEDERAL NATIONAL MORTGAGE ASSOCIATION  
vs.  
DEFENDANT: SHIREY, MICHAEL

WRIT OF EXECUTION POSSESSION

**SHERIFF RETURN**

---

DATE RECEIVED WRIT: 06/08/2004

LEVY TAKEN @

POSTED @

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 04/20/2005

DATE DEED FILED

PROPERTY ADDRESS P. O. BOX 81, WATER STREET KARTHAUS , PA 16845

**SERVICES**

@

SERVED RUTH DOMBROWSKI

NOW, JUNE 29, 2004 DEPUTY ATTEMPTED SERVICE ON DEFENDANT, HOUSE WAS EMPTY, CALLED ATTORNEY TO INFORM THEM HOUSE WAS EMPTY.

@

SERVED OCCUPANT

NOW, APRIL 20, 2005 RETURN WRIT AS NOT SERVED HOUSE WAS EMPTY.

**FILED**

*Shaw* 3:33 PM  
APR 20 2005

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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PLAINTIFF: FEDERAL NATIONAL MORTGAGE ASSOCIATION

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WRIT OF EXECUTION POSSESSION

SHERIFF RETURN

---

SHERIFF HAWKINS \$36.25

SURCHARGE \$20.00 PAID BY ATTORNEY


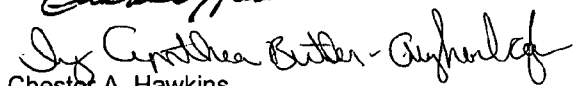
\$56.25

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2005

\_\_\_\_\_

So Answers,

  
  
Chester A. Hawkins  
Sheriff

WRIT OF POSSESSION -- (EJECTMENT PROCEEDINGS) P.R.C.P. 3160 TO 3165

Commonwealth of Pennsylvania, County of Clearfield:

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthaus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

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

Federal National Mortgage Association

being: (Premises as follows):

Water Street, P.O. Box, 81, Karthaus, PA 16845

A more detailed legal description of the subject premises has been filed with the Clerk/Prothonotary of said County, as appended to the Plaintiff's Praeceptum to have issued said Writ of Possession.

- (2) To satisfy the costs against the defendant(s) you are directed to levy upon any property of the defendant(s) and sell his, her, or their interest therein.

Date: 6/8/04



Prothonotary, Clerk of Common Pleas of  
Clearfield County, Pennsylvania

(SEAL)

Received June 8, 2004 @ 2:30 P.M.  
Chester A. Hunsicker  
by Cynthia Butler-Augherbaugh

BY: \_\_\_\_\_  
(Deputy)

Original Docket No. 2004-535-CD

IN THE COURT OF COMMON PLEAS  
FOR CLEARFIELD COUNTY, PENNSYLVANIA

---

FEDERAL NATIONAL MORTGAGE ASSOCIATION

vs.

MICHAEL SHIREY AND RUTH DOMBROWSKI and Occupant(s) of  
Water Street, P.O. Box, 81, Karthaus, PA 16845

---

**WRIT OF POSSESSION**

Costs:

Prothonotary	\$ <u>125.00</u>
Judgment Fee	\$ _____
Cr.	\$ _____
Satisfaction	\$ _____
<b>TOTAL</b>	<b>\$ _____</b>

The Law Offices of Barbara A. Fein, P.C.  
Barbara A. Fein and Kristen J. DiPaolo, Esquires  
Attorneys for the Plaintiff  
425 Commerce Drive, Suite 100  
Fort Washington, PA 19034

THE LAW OFFICES OF BARBARA A. FEIN, P.C.  
Barbara A. Fein, Esquire / I.D. No. 53002  
Kristen J. DiPaolo, Esquire / I.D. No. 79992  
425 Commerce Drive, Suite 100  
Fort Washington, PA 19034  
(215) 653-7450  
Attorneys for Plaintiff

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthaus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CO

**CIVIL ACTION EJECTMENT**

**NOTICE**

YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED. BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE COMPLAINT OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Raymond L. Billotte, Court Administrator  
Clearfield County Courthouse  
1 North Second Street  
Clearfield, PA 16380  
(814) 765-2641

04-11155/P040667

**NOTICIA**

LE HAN DEMANDADO A USTED EN LA CORTE. SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINAS SIGUIENTES, USTED TIENE (20) DIAS DE PLAZO A PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICACION. USTED DEBE PRESENTAR UNA APARIENCIA ESCRITA O EN PERSONA O POR ABOGADO Y ARCHIVAR EN LA CORTE SUS DEFENSAS O SUS OBJECIONES A LAS DEMANDAS ENCONTRA DE SU PERSONA. SEA AVISADO QUE SI USTED NO SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE ENTRAR UNA ORDEN CONTRA USTED SIN PREVIO AVISO O NOTIFICACION O POR CUALQUIER QUEJA O ALIVIO QUE ESPEDIDO EN LA PETICION DE DEMANDA. USTED PUEDE PERDER DINERO, SUS PROPIEDADES O OTROS DERECHOS IMPORTANTES PARA USTED.

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

Raymond L. Billotte, Court Administrator  
Clearfield County Courthouse  
1 North Second Street  
Clearfield, PA 16380  
(814) 765-2641

**FILED**

APR 19 2004

pm 11:35/

William A. Shaw  
Prothonotary

2004-535-CO

## CIVIL ACTION -- EJECTMENT

1. The Plaintiff, Federal National Mortgage Association, is a corporation authorized to do business within the Commonwealth of Pennsylvania, having its principal place of business at 1900 Market Street, Suite 800, Philadelphia, PA 19103.

2. (a) The Defendant, Michael Shirey, is an individual whom Plaintiff believes and therefore avers is residing at the property address, that being Water Street, P.O. Box, 81, Karthaus, PA 16845, hereinafter referred to as the "Premises".

(b) The Defendant, Michael Shirey, is an individual whom Plaintiff believes and therefore avers is residing at the Premises.

(c) The Defendant (Unknown) Occupant(s) is/are individuals whom Plaintiff believes and therefore avers are residing at the Premises.

3. The Premises which are described at Exhibit "A" attached hereto and incorporated herein by reference, were sold at the Clearfield County Sheriff's Sale conducted on April 2, 2004, after due advertisement and according to law, under and by virtue of a Writ of Execution issued to satisfy a Judgment entered in the Court of Common Pleas for Clearfield County at the suit of Washington Mutual Bank, F.A. v. Michael L. Shirey, as Court Docket Number 2003-1280-CD.

4. The Premises were purchased by the Plaintiff at the Sheriff's Sale, said sale results being a matter of public record.

5. The Plaintiff acquired title to the Premises on the date of and by virtue of said Sheriff's Sale, and is the real and current entitled owner of said Premises by virtue of a Clearfield County Sheriff's Deed Poll, to be recorded in the Clearfield County Recorder of Deeds' Office at the earliest possible date.

6. The persons in possession of the Premises are believed to be the Defendant(s) in this action and are occupying the Premises without right and without claim to title.

7. The Defendants herein named were duly served with Notices of the Sheriff's Sale held on April 2, 2004.

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




WHEREFORE, the Plaintiff, Federal National Mortgage Association, respectfully requests entry of judgment for immediate possession of the Premises, issuance of a Writ of Possession and a judgment of its costs and disbursements in this action.

Respectfully Submitted,

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY:

A handwritten signature in cursive script, reading "Barbara A. Fein", written over a horizontal line.

Barbara A. Fein, Esquire  
Attorney for Plaintiff  
Attorney I.D. No. 53002

ALL those certain lots or tracts of ground situate in the Village of Karthaus, Clearfield County, Pennsylvania, bounded and described as follows:

PARCEL NO. 1:

BEGINNING at the Northeast corner of Potter and Water Streets, and fifty feet from the line of Water Street;

THENCE along the Eastern side of Potter Street, one hundred and twenty (120) feet to a post;

THENCE in an Easterly direction, sixty (60) feet to a post corner;

THENCE in a Southerly direction, one hundred and twenty (120) feet to Water Street;

THENCE Westerly with the North side of Water Street, sixty (60) feet to Potter Street and place of beginning, and being the Lot opposite to Lot No. 42 in Block "C" in the plan of the Village of Karthaus, as filed in the Recorder's Office in Clearfield County in Misc. Book Vol. 65 page 566.

PARCEL NO. 2:

BEGINNING at an iron pipe corner at the north side of Water Street and 60 feet East (erroneously referred to as West in previous Deed) of Potter Street;

THENCE along lot of Claire Reiter North nine (9) degrees forty five (45) minutes west one hundred twenty (120) feet to a pipe corner;

THENCE along other lands of George Keidel and Fredericka Keidel north (80) degrees fifteen (15) minutes east sixty (60) feet to a pipe corner;

THENCE along other lands of George Keidel and Fredericka Keidel south nine (9) degrees forty-five (45) minutes East one hundred twenty (120) feet to a pipe corner at the north side of Water Street;

THENCE along Water Street south eighty (80) degrees fifteen (15) minutes West sixty (60) feet to the place of beginning. The above courses conform to those shown on the map of the Village of Karthaus recorded in Misc. Book 65, page 566, in the Office of the Recorder of Deed in Clearfield County.

SUBJECT TO all exceptions, reservations, conditions, restrictions, easements and rights-of-way as fully as the same are contained in all prior deeds, instruments or writings or in any other manner touching or affecting the premises hereby conveyed.

HAVING THEREON ERECTED A DWELLING HOUSE KNOWN AS: WATER STREET, PO BOX 81 KARTHAUS, PENNSYLVANIA 16845

BEING THE SAME PREMISES WHICH Edward R. Remp and Kristen B. Remp f/k/a Kristen B. Quinter, by Deed dated 9/20/00 and recorded 9/20/00 as Clearfield County Instrument Number 200013995, granted and conveyed unto Michael L. Shirey.

Assessment # 121-T04-607-55.1




VERIFICATION

BARBARA A. FEIN, ESQUIRE, hereby states that she is the Attorney for the Plaintiff in this action, that she is authorized to make this Affidavit, and that the statements made in the foregoing Civil Action Complaint in Ejectment are true and correct to the best of her knowledge, information and belief.

The undersigned understands that this statement herein is made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

Dated: April 16, 2004

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY:   
Barbara A. Fein, Esquire  
Attorney for Plaintiff  
Attorney I.D. No. 53002

**THE LAW OFFICES OF BARBARA A. FEIN, P.C.**

425 Commerce Drive, Suite 100  
Fort Washington, PA 19034  
(215) 653-7450

TO: Sheriff's Department of Clearfield County

FROM: Karen Barron, Legal Assistant to Barbara A. Fein, Esquire  
Ext. 119

DATE: April 16, 2004

RE: Federal National Mortgage Association v. Michael Shirey  
Our File No. 04-11155

---

**MEMORANDUM**

---

Dear Sir/Madam:

Enclosed please find our Check No. 37396, made payable in the amount of \$75.00, representing costs to effect personal service of the attached Civil Action Ejectment Complaint against the following Defendant(s):

Michael Shirey  
Water Street, P.O. Box, 81, Karthaus, PA 16845

Occupant(s)  
Water Street, P.O. Box, 81, Karthaus, PA 16845

I am also enclosing a self-addressed, stamped envelope which will facilitate your return of proofs of service.

Thank you for your anticipated assistance. Please feel free to contact me if you have any questions regarding this matter.

**FILED**

APR 19 2004

William A. Shaw  
Prothonotary

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

FEDERAL NATIONAL MORTGAGE ASSOCIATION

Sheriff Docket # 15453

VS.

04-535-CD

SHIREY, MICHAEL and OCCUPANTS

COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

NOW MAY 7, 2004 AT 8:17 AM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON RUTH DEMBOWSKI, OCCUPANT AT RESIDENCE, WATER ST., PO BOX 81, KARTHAUS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO RUTH DEMBOWSKI A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: NEVLING/HUNTER

NOW MAY 14, 2004 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO MICHAEL SHIREY, DEFENDANT. MOVED OUT OF STATE., ADDRESS UNKNOWN.

**Return Costs**

Cost	Description
40.25	SHERIFF HAWKINS PAID BY: ATTY CK# 37396
20.00	SURCHARGE PAID BY: ATTY CK# 37516

Sworn to Before Me This

So Answers,

17 Day Of May 2004  
William A. Shaw

Chester A. Hawkins  
Chester A. Hawkins  
Chester A. Hawkins  
Sheriff

**FILED**

1:25 PM

MAY 17 2004

912

William A. Shaw  
Prothonotary

THE LAW OFFICES OF BARBARA A. FEIN, P.C.  
Barbara A. Fein, Esquire / I.D. No. 53002  
Kristen J. DiPaolo, Esquire / I.D. No. 79992  
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Attorneys for Plaintiff

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and OCCUPANTS OF  
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Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CO

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Raymond L. Billotte, Court Administrator  
Clearfield County Courthouse  
1 North Second Street  
Clearfield, PA 16380  
(814) 765-2641

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

04-11155/P040667

APR 19 2004

Attest.

*William L. Proth*  
Prothonotary/  
Clerk of Courts

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Respectfully Submitted,

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY: Barbara A. Fein  
Barbara A. Fein, Esquire  
Attorney for Plaintiff  
Attorney I.D. No. 53002

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Assessment # 121-T04-607-55.1




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Dated: April 16, 2004

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY:   
Barbara A. Fein, Esquire  
Attorney for Plaintiff  
Attorney I.D. No. 53002

THE LAW OFFICES OF BARBARA A. FEIN, P.C.  
Barbara A. Fein, Esquire / I.D. No. 53002  
Kristen J. DiPaolo, Esquire / I.D. No. 79992  
425 Commerce Drive, Suite 100  
Fort Washington, PA 19034  
(215) 653-7450  
Attorneys for Plaintiff

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthaus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

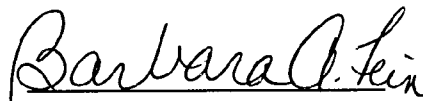
PRAECIPE TO INDEX DEFENDANT  
OCCUPANT AS DEFENDANT IN POSSESSORY ACTION

TO THE PROTHONOTARY:

Pursuant to Pa. R.C.P. Rule 410(b)(2), kindly index " Ruth Dombrowski" as named Defendant(s) to this possessory action insofar as the Return of Service filed by the sheriff reflects this individual's residency at the foreclosed premises (Exhibit "A"; Return of Service).

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY:



Barbara A. Fein, Esquire  
Attorney for Plaintiff

FILED

MAY 26 2004

William A. Shaw  
Prothonotary/Clerk of Courts

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

FEDERAL NATIONAL MORTGAGE ASSOCIATION

VS.

SHIREY, MICHAEL and OCCUPANTS

COMPLAINT IN EJECTMENT

Sheriff Docket #

15453

04-535-CD

COPY

**SHERIFF RETURNS**

NOW MAY 7, 2004 AT 8:17 AM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON RUTH DEMBOWSKI, OCCUPANT AT RESIDENCE, WATER ST., PO BOX 81, KARTHAUS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO RUTH DEMBOWSKI A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
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**Return Costs**

Cost	Description
40.25	SHERIFF HAWKINS PAID BY: ATTY CK# 37396
20.00	SURCHARGE PAID BY: ATTY CK# 37516

Sworn to Before Me This

\_\_\_\_ Day Of \_\_\_\_\_ 2004

So Answers,



**Chester A. Hawkins**  
**Sheriff**

FILED

MAY 11 2004

William A. Shaw

Prothonotary/Clerk of Courts

nb  
cc  
[Signature]

IN THE COURT OF COMMON PLEAS  
FOR CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthus, PA 16845,  
Defendants.

NO. 2004-535-CD

PRAECIPE FOR JUDGMENT FOR FAILURE TO ANSWER

Kindly enter judgment for possession in favor of Plaintiff, Federal National Mortgage Association, and against the Defendant, Ruth Dombrowski and (Unknown) Occupants/Tenants of Water Street, P.O. Box, 81, Karthus, PA 16845, for failure to file an Answer to Plaintiff's Complaint in Ejectment within twenty (20) days from service thereof.

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY: Barbara A. Fein  
Barbara A. Fein, Esquire

AND NOW, this 8<sup>th</sup> day of June, 2004, judgment for possession is entered in favor of the Plaintiff, Federal National Mortgage Association, and against the Defendant, Ruth Dombrowski and Occupants/Tenants of Water Street, P.O. Box, 81, Karthus, PA 16845.

William A. Shaw  
WILLIAM SHAW, Prothonotary  
Clearfield County

FILED

JUN 08 2004

William A. Shaw  
Prothonotary/Clerk of Courts



IN THE COURT OF COMMON PLEAS  
FOR CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthaus, PA 16845,  
Defendants.

NO. 2004-535-CD

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA

:

: S.S.:

COUNTY OF MONTGOMERY

:

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

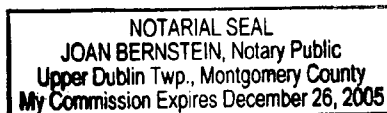
Defendant : Michael Shirey and Ruth Dombrowski  
Age : Over 18  
Residence : Water Street, P.O. Box, 81, Karthaus, PA 16845  
Employment : Unknown

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY: Barbara A. Fein  
Barbara A. Fein, Esquire  
Counsel for Plaintiff

Sworn to and subscribed  
before me this 28th  
day of May, 2004.

Joan Bernstein  
Notary Public



THE LAW OFFICES OF BARBARA A. FEIN, P.C.  
Barbara A. Fein, Esquire / I.D. No. 53002  
Kristen J. DiPaolo, Esquire / I.D. No. 79992  
425 Commerce Drive, Suite 100  
Fort Washington, PA 19034  
(215) 653-7450  
Attorneys for Plaintiff

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthaus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

CERTIFICATION OF MAILING OF NOTICE UNDER PA. RCP RULE 237.1

The undersigned hereby certifies that a written Notice of Intention to File a Praecipe for the Entry of Default Judgment was mailed to the Defendant(s) and/or to their legal counsel of record, if any, after the default occurred and at least ten (10) days prior to the date of the filing of the Praecipe. Said Notice was sent on the date set forth in the appended copy of the Notice, sent as stated.

Dated: May 28, 2004

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY: 

Barbara A. Fein, Esquire  
Attorney for Plaintiff  
Attorney I.D. No. 53002

C

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

Barbara A. Fein, Esquire / I.D. No. 53002

Kristen J. DiPaolo, Esquire / I.D. No. 79992

425 Commerce Drive, Suite 100

Fort Washington, PA 19034

(215) 653-7450

Attorneys for Plaintiff

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthaus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

NOTICE OF INTENTION TO TAKE DEFAULT UNDER PA. RCP RULE 237.1

IMPORTANT NOTICE

You are in default because you have failed to take action required of you in this case. Unless you act within ten (10) days from the date of this notice as set forth below, a Judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to a lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal help:

Raymond L. Billotte, Court Administrator  
Clearfield County Courthouse  
1 North Second Street  
Clearfield, PA 16380  
(814) 765-2641

NOTIFICACION IMPORTANTE

Usted se encuentra en estado de rebeldia por no haber tomado la accion requerida de su parte en este case. Al no tomar la accion debida dentro de un termino de diez (10) dias de la fecha de esta notificacion, el tribuna podra, sin necesidad de compararecer usted in 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 assitencia legal:

Raymond L. Billotte, Court Administrator  
Clearfield County Courthouse  
1 North Second Street  
Clearfield, PA 16380  
(814) 765-2641

Date of Notice: May 28, 2004


PERSONS SERVED:

Michael Shirey  
Water Street, P.O. Box 81  
Karthus, PA 16845

Ruth Dombrowski  
Water Street, P.O. Box 81  
Karthus, PA 16845

Occupants/Tenants  
Water Street, P.O. Box, 81  
Karthus, PA 16845

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY: 

Barbara A. Fein, Esquire  
Attorney for Plaintiff  
Attorney I.D. No. 53002

11155/KLB

11155/KLB

THE LAW OFFICES OF BARBARA A. FEIN, P.C.  
Barbara A. Fein, Esquire / I.D. No. 53002  
Kristen J. DiPaolo, Esquire / I.D. No. 79992  
425 Commerce Drive, Suite 100  
Fort Washington, PA 19034  
(215) 653-7450  
Attorneys for Plaintiff

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

#### CERTIFICATION OF ADDRESS


I, Barbara A. Fein, Esquire, Attorney for Plaintiff, Federal National Mortgage Association, hereby certify that the Plaintiff's correct address is 1900 Market Street, Suite 800, Philadelphia, PA 19103, and the last known address of each Defendant is as below.

Michael Shirey  
Water Street, P.O. Box 81  
Karthus, PA 16845

Ruth Dombrowski  
Water Street, P.O. Box 81  
Karthus, PA 16845

Occupants/Tenants  
Water Street, P.O. Box, 81  
Karthus, PA 16845

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY:   
Barbara A. Fein, Esquire  
Attorney for Plaintiff

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

Barbara A. Fein, Esquire / I.D. No. 53002

Kristen J. DiPaolo, Esquire / I.D. No. 79992

425 Commerce Drive, Suite 100

Fort Washington, PA 19034

(215) 653-7450

Attorneys for Plaintiff

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

CERTIFICATE OF SERVICE

I, Barbara A. Fein, Esquire, Attorney for Plaintiff, Federal National Mortgage Association, hereby certify that I have served a true and correct copy of the appended pleadings/papers upon the following parties at the last known address and/or upon an attorney of record, as noted:

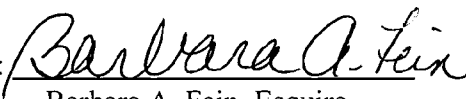
Michael Shirey  
Water Street, P.O. Box 81  
Karthus, PA 16845

Ruth Dombrowski  
Water Street, P.O. Box 81  
Karthus, PA 16845

Occupants/Tenants  
Water Street, P.O. Box, 81  
Karthus, PA 16845

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY:



Barbara A. Fein, Esquire  
Attorney for Plaintiff

FILED

Notice to Debtors.

CP  
for

M/12:39 PM  
JUN 08 2004

Atty Fein pd 2000

William A. Shaw

1ccg Notice also to

Prothonotary/Clerk of Courts

Shff with writ package



Clearfield County Courthouse  
Clearfield County Prothonotary  
P.O. Box 549  
Clearfield, PA 16830

COPY

TO: Ruth Dombrowski  
Water Street, P.O. Box 81  
Karthus, PA 16845

Occupants/Tenants  
Water Street, P.O. Box 81  
Karthus, PA 16845

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

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 captioned proceeding as indicated below.

WILLIAM SHAW, Prothonotary

*William Shaw* 6/8/04

[XX] Judgment for Possession entered by Default

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

BARBARA A. FEIN, ESQUIRE AT (215) 653-7450.

THE LAW OFFICES OF BARBARA A. FEIN, P.C.  
Barbara A. Fein, Esquire / I.D. No. 53002  
Kristen J. DiPaolo, Esquire / I.D. No. 79992  
425 Commerce Drive, Suite 100  
Fort Washington, PA 19034  
(215) 653-7450  
Attorneys for Plaintiff

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

PRAECIPE FOR WRIT OF POSSESSION

TO THE PROTHONOTARY:

Kindly issue a Writ of Possession in the above matter with respect to real property situated  
at Water Street, P.O. Box, 81, Karthus, PA 16845.

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

**FILED**

**JUN 08 2004**

William A. Shaw  
Prothonotary/Clerk of Courts

BY: Barbara A. Fein  
Barbara A. Fein, Esquire  
Attorney for Plaintiff

FILED 300 28 units  
m/12:53 ~~to~~ to shf  
JUN 08 2004

William A. Shaw  
Prothonotary/Clerk of Courts  
Atty Fein pd. 20.00

WRIT OF POSSESSION -- (EJECTMENT PROCEEDINGS) P.R.C.P. 3160 TO 3165

Commonwealth of Pennsylvania, County of Clearfield:

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

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

Federal National Mortgage Association

being: (Premises as follows):

Water Street, P.O. Box, 81, Karthus, PA 16845

A more detailed legal description of the subject premises has been filed with the Clerk/Prothonotary of said County, as appended to the Plaintiff's Praecipe to have issued said Writ of Possession.

- (2) To satisfy the costs against the defendant(s) you are directed to levy upon any property of the defendant(s) and sell his, her, or their interest therein.

Date: 6/8/04



Prothonotary, Clerk of Common Pleas of  
Clearfield County, Pennsylvania

(SEAL)

BY: \_\_\_\_\_  
(Deputy)

Original Docket No. 2004-535-CD

IN THE COURT OF COMMON PLEAS  
FOR CLEARFIELD COUNTY, PENNSYLVANIA

FEDERAL NATIONAL MORTGAGE ASSOCIATION

vs.

MICHAEL SHIREY AND RUTH DOMBROWSKI and Occupant(s) of  
Water Street, P.O. Box, 81, Karthaus, PA 16845

WRIT OF POSSESSION

Costs:

Prothonotary	\$	<u>125.00</u>
Judgment Fee	\$	_____
Cr.	\$	_____
Satisfaction	\$	_____
<b>TOTAL</b>	<b>\$</b>	_____

The Law Offices of Barbara A. Fein, P.C.  
Barbara A. Fein and Kristen J. DiPaolo, Esquires  
Attorneys for the Plaintiff  
425 Commerce Drive, Suite 100  
Fort Washington, PA 19034

THE LAW OFFICES OF BARBARA A. FEIN, P.C.  
Barbara A. Fein, Esquire / I.D. No. 53002  
Kristen J. DiPaolo, Esquire / I.D. No. 79992  
425 Commerce Drive, Suite 100  
Fort Washington, PA 19034  
(215) 653-7450  
Attorneys for Plaintiff

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthaus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

PRAECIPE TO MARK JUDGMENT SATISFIED

TO THE PROTHONOTARY:

Kindly mark the judgment entered in the above referenced  
matter satisfied of record.

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY: 

Kristen J. DiPaolo, Esquire  
Attorney for Plaintiff  
Attorney I.D. No. 79992

Dated: June 29, 2004

FILED No  
cc  
JUL 06 2004 Certificate to Atty  
William A. Shaw Atty pd. 7.00  
Prothonotary/Clerk of Courts

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

**CIVIL DIVISION**

COPY

**CERTIFICATE OF SATISFACTION OF JUDGMENT**

Federal National Mortgage Association

No.: 2004-00535-CD

Vs.

Debt: Judgment for Possession

Michael Shirey and  
Ruth Dombrowski and  
Occupants

Atty's Comm.:

Interest From:

Cost: \$7.00

NOW, Tuesday, July 06, 2004 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 6th day of July, A.D. 2004.

\_\_\_\_\_  
Prothonotary

THE LAW OFFICES OF BARBARA A. FEIN, P.C.  
Barbara A. Fein, Esquire / I.D. No. 53002  
Kristen J. DiPaolo, Esquire / I.D. No. 79992  
425 Commerce Drive, Suite 100  
Fort Washington, PA 19034  
(215) 653-7450  
Attorneys for Plaintiff

FEDERAL NATIONAL  
MORTGAGE ASSOCIATION ,  
Plaintiff,

v.

MICHAEL SHIREY  
AND RUTH DOMBROWSKI  
and OCCUPANTS OF  
Water Street, P.O. Box, 81  
Karthaus, PA 16845,  
Defendants.

COURT OF COMMON PLEAS  
CLEARFIELD COUNTY

NO. 2004-535-CD

PRAECIPE TO SETTLE, DISCONTINUE, AND END

TO THE PROTHONOTARY:

Kindly mark the above referenced matter settled,  
discontinued and ended without prejudice to Plaintiff.

THE LAW OFFICES OF BARBARA A. FEIN, P.C.

BY: 

Kristen J. DiPaolo, Esquire  
Attorney for Plaintiff  
Attorney I.D. No. 79992

Dated: June 29, 2004

FILED *NO CC*  
*m/2:14/301*  
JUL 06 2004  
*Copy to CIA*  
William A. Shaw  
Prothonotary/Clerk of Courts



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

**CIVIL DIVISION**

COPEL

**Federal National Mortgage Association**

**Vs.**

**No. 2004-00535-CD**

**Michael Shirey and  
Ruth Dombrowski and  
Occupants**

**CERTIFICATE OF DISCONTINUATION**

Commonwealth of PA  
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on July 6, 2004, marked:

Settled, Discontinued and Ended without Prejudice to Plaintiff

Record costs in the sum of \$132.00 have been paid in full by Barbara A. Fein, P.C.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 6th day of July A.D. 2004.

---

William A. Shaw, Prothonotary