

04-627-CD
CHASE MANHATTAN MORTGAGE CORP. vs. RICKY A. BLOOM, Ftal

**Chase Manhattan vs Ricky A. Bloom
2004-627-CD**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
CORPORATION,

Plaintiff,

vs.

RICKY A. BLOOM and
DALINDA A. BLOOM,

Defendants.

TO DEFENDANT

You are hereby notified to plead
to the ENCLOSED COMPLAINT WITHIN
TWENTY (20) DAYS FROM SERVICE HEREOF

Kristine M. Anthou

ATTORNEY FOR PLAINTIFF

I HEREBY CERTIFY THAT THE ADDRESS
OF THE PLAINTIFF IS:
75 Fairway Drive
Vernon Hills, IL 60061

AND THE DEFENDANT IS:
316 Pine Street
Curwensville, PA 16833

Kristine M. Anthou

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF LOCATION

I HEREBY CERTIFY THAT THE LOCATION OF THE
REAL ESTATE AFFECTED BY THIS LIEN IS
316 Pine Street, Borough of Curwensville

(CITY, BORO, TOWNSHIP) (WARD)

Kristine M. Anthou

ATTORNEY FOR PLAINTIFF

CIVIL DIVISION

NO.: 04-627-4

TYPE OF PLEADING

CIVIL ACTION-COMPLAINT
IN EJECTMENT

FILED ON BEHALF OF PLAINTIFF:
Chase Manhattan Mortgage Corporation

COUNSEL OF RECORD FOR THIS
PARTY:

Kristine M. Anthou, Esquire
Pa. I.D. #77991

GRENNEN & BIRSCIC, P.C.
One Gateway Center
9 West
Pittsburgh, PA 15222
(412) 281-7650

FILED

MAY 05 2004

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
CORPORATION,

CIVIL DIVISION

NO.:

Plaintiff,

vs.

RICKY A. BLOOM and
DALINDA A. BLOOM,

Defendants.

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claim 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.

Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
1(800) 692-7375

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
CORPORATION,

CIVIL DIVISION

NO.:

Plaintiff,

vs.

RICKY A. BLOOM and
DALINDA A. BLOOM,

Defendants.

CIVIL ACTION - COMPLAINT IN EJECTMENT

Chase Manhattan Mortgage Corporation, by its attorneys, Grenen & Birsic, P.C., files this Complaint in Ejectment, as follows:

1. Plaintiff is a lending institution duly authorized to conduct business in the Commonwealth of Pennsylvania with a place of business located at 3415 Vision Drive, Columbus, OH, 43219-6009.
2. The Defendants, Ricky A. Bloom and Dalinda A. Bloom are individuals whose last known address is 316 Pine Street, Curwensville, PA, 16833.
3. On or about April 2, 2004, the real property and improvements thereon commonly known as 316 Pine Street, Curwensville, PA, 16833(hereinafter "Premises") were sold to Plaintiff pursuant to the Sheriff's Sale in Clearfield County. A true and correct copy of the legal description of said property is marked as Exhibit "A", attached hereto and made a part hereof.
4. At the time of the Sheriff Sale, Defendants were occupying the Premises.
5. Plaintiff, by virtue of said Sheriff's Sale, is the owner of the Premises and therefore right to immediate possession and title to the Premises is in Plaintiff and not in Defendants.

6. On April 14, 2004, counsel for Plaintiff sent written notice to the Defendants to vacate the Premises on or before April 29, 2004. A true and correct copy of said Notices are marked Exhibit "B", attached hereto and made a part hereof.

7. Defendants are unjustly and unlawfully occupying, using and enjoying the Premises without right and to the detriment of Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendants for possession of the Premises known as 316 Pine Street, Curwensville, PA, 16833, together with such other relief as this Honorable Court may deem necessary.

GRENEN & BIRSIC, P.C.

BY:

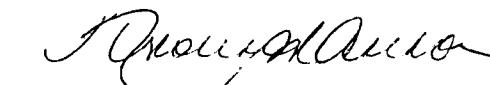

Kristine M. Anthou, Esquire
PA ID. #77991
Attorneys for Plaintiff
Nine West, One Gateway Center
Pittsburgh, PA 15222
(412) 281-7650

Exhibit “A”

ALL that certain lot or piece of ground, including improvements, situated in the Borough of Curwensville, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post at corner of Pine Street and an alley, at rear of lot now or formerly of Dr. G.C. Jenkins, thence by said alley westward, one hundred and ninety (190) feet to a post on alley, thence by said alley southward, forty-two (42) feet to a post at corner of lot now or formerly of Ned Bloom, thence by said lot eastward one hundred ninety (190) feet to a post on Pine Street, thence by Pine Street northward, forty-two (42) feet, to a post and place of beginning.

Exhibit “B”

GRENEN & BIRSIK, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER
NINE WEST
PITTSBURGH, PA 15222
(412) 281-7650
FAX (412) 281-7657
EMAIL KANTHOU@GRENENBIRSIK.COM

April 14, 2004

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
AND
FIRST CLASS MAIL, POSTAGE PREPAID

Ricky A. Bloom or
Current Occupant
316 Pine Street
Curwensville, PA 16833

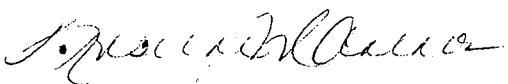
RE: NOTICE TO VACATE

Dear Mr. Bloom
or Current Occupant:

As you may be aware, this firm represents Chase Manhattan Mortgage Corporation in connection with the above-captioned matter. As you may also be aware, Chase purchased the property at a sale conducted by the Sheriff of Clearfield County on April 2, 2004. Accordingly, Chase is now the record title owner of the property.

Our client has recently informed me that you remain on this property. The purpose of this letter is to notify you that you must vacate the premises on or before fifteen (15) days from the date of this letter. If you fail to vacate the premises on or before that date, Chase will institute formal legal action to have you removed from the premises. I trust that such will not be necessary. If you have any questions, please feel free to contact me.

Very truly yours,



Kristine M. Anthou

U.S. POSTAL SERVICE	CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	
Received From:	

Grenet, T. J. T.	
One Gateway Center, Nine West	
Pittsburgh, PA 15222	
15-Suburbia, PA 15222	
APR 14 2004	
4457685	
One piece of ordinary mail addressed to:	
RICKY A. Bloom or Current OCC	
314 Pine Street	
Curwensville, PA 16833	
16833 POSTAGE	
6 0	
4457685	

Postage in stamps or meter postage and postmark, if any, or Postmaster's signature and fee.

PS Form 3817, January 2001

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Ricky A. Bloom or
Current Occupant
314 Pine Street
Curwensville, PA 16833

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *Jonathan Brown* Agent

Addressee

B. Received by (Printed Name)

TJ

C. Date of Delivery

4/16/04

D. Is delivery address different from item 1?

Yes

If YES, enter delivery address below:

No

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number
(Transfer from service label)

7003 2260 0005 8506 0611

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-14-1540

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only, No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
TT90 9059 5000 0922 E002	Postage
	\$
	4.42
Return Receipt Fee (Endorsement Required)	Certified Fee
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	
\$ 4.42	
Postmark Here	
Sent To RICKY A. Bloom or Current OCC Street, Apt. No.: 314 Pine Street or PO Box No. City, State, ZIP+4 Curwensville, PA 16833	
PS Form 3800, June 2002	
See reverse for instructions.	

GRENNEN & BIRSCIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER
NINE WEST
PITTSBURGH, PA 15222
(412) 281-7650
FAX (412) 281-7657
EMAIL KANTHOU@GRENNENBIRSCIC.COM

April 14, 2004

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
AND
FIRST CLASS MAIL, POSTAGE PREPAID

Dalinda A. Bloom or
Current Occupant
316 Pine Street
Curwensville, PA 16833

RE: NOTICE TO VACATE

Dear Mrs. Bloom
or Current Occupant:

As you may be aware, this firm represents Chase Manhattan Mortgage Corporation in connection with the above-captioned matter. As you may also be aware, Chase purchased the property at a sale conducted by the Sheriff of Clearfield County on April 2, 2004. Accordingly, Chase is now the record title owner of the property.

Our client has recently informed me that you remain on this property. The purpose of this letter is to notify you that you must vacate the premises on or before fifteen (15) days from the date of this letter. If you fail to vacate the premises on or before that date, Chase will institute formal legal action to have you removed from the premises. I trust that such will not be necessary. If you have any questions, please feel free to contact me.

Very truly yours,



Kristine M. Anthou

U.S. POSTAL SERVICE

CERTIFICATE OF MAILING

MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT
PROVIDE FOR INSURANCE—POSTMASTER

Received From:

Greener & Ehrle, P.C.

One Gateway Center, Nine West

Pittsburgh, PA 15222

15

May 2001

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VERIFICATION

The undersigned, and duly authorized representative of Plaintiff, deposes and says subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities that the facts set forth in the foregoing Complaint in Ejectment are true and correct to his information and belief.



STEPHEN STROBEL

ASSISTANT SECRETARY

In The Court of Common Pleas of Clearfield County, Pennsylvania

CHASE MANHATTAN MORTGAGE CORPORATION

Sheriff Docket # 15537

VS.

04-627-CD

BLOOM, RICKY A. & DALINDA A.

COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW JUNE 1, 2004 RETURN THE WITHIN COMPLAINT IN EJECTMENT "NOT SERVED, HOUSE EMPTY" AS TO RICKY A. BLOOM and DALINDA A. BLOOM, DEFENDANTS.

Return Costs

Cost	Description
29.50	SHERIFF HAWKINS PAID BY: ATTY CK# 88155
20.00	SURCHARGE PAID BY: ATTY CK# 88156

Sworn to Before Me This

3rd Day Of June 2004
William A. Shaw

So Answers,

Chester A. Hawkins
by Marilyn Hause
Chester A. Hawkins
Sheriff

FILED

Q10

JUN 03 2004

010548 am

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
CORPORATION,

Plaintiff,

CIVIL DIVISION

NO.: 04-627-CD

vs.

RICKY A. BLOOM and
DALINDA A. BLOOM,

Defendants.

TYPE OF PLEADING

CIVIL ACTION-COMPLAINT
IN EJECTMENT

FILED ON BEHALF OF PLAINTIFF:
Chase Manhattan Mortgage Corporation

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TWENTY (20) DAYS FROM SERVICE HEREOF

Kristine M. Anthou
ATTORNEY FOR PLAINTIFF

COUNSEL OF RECORD FOR THIS
PARTY:

Kristine M. Anthou, Esquire
Pa. I.D. #77991

I HEREBY CERTIFY THAT THE ADDRESS
OF THE PLAINTIFF IS:
75 Fairway Drive
Vernon Hills, IL 60061

GRENEN & BIRSCIC, P.C.
One Gateway Center
9 West
Pittsburgh, PA 15222
(412) 281-7650

AND THE DEFENDANT IS:

316 Pine Street
Curwensville, PA 16833

Kristine M. Anthou
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF LOCATION
I HEREBY CERTIFY THAT THE LOCATION OF THE
REAL ESTATE AFFECTED BY THIS LIEN IS
316 Pine Street, Borough of Curwensville

(CITY, BORO, TOWNSHIP) (WARD)

Kristine M. Anthou
ATTORNEY FOR PLAINTIFF

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

MAY 05 2004

Attest.

William J. Brown
Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
CORPORATION,

CIVIL DIVISION

NO.:

Plaintiff,

vs.

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DALINDA A. BLOOM,

Defendants.

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1(800) 692-7375

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
CORPORATION,

CIVIL DIVISION

NO.:

Plaintiff,

vs.

RICKY A. BLOOM and
DALINDA A. BLOOM,

Defendants.

CIVIL ACTION - COMPLAINT IN EJECTMENT

Chase Manhattan Mortgage Corporation, by its attorneys, Grenen & Birsic, P.C., files this Complaint in Ejectment, as follows:

1. Plaintiff is a lending institution duly authorized to conduct business in the Commonwealth of Pennsylvania with a place of business located at 3415 Vision Drive, Columbus, OH, 43219-6009.
2. The Defendants, Ricky A. Bloom and Dalinda A. Bloom are individuals whose last known address is 316 Pine Street, Curwensville, PA, 16833.
3. On or about April 2, 2004, the real property and improvements thereon commonly known as 316 Pine Street, Curwensville, PA, 16833(hereinafter "Premises") were sold to Plaintiff pursuant to the Sheriff's Sale in Clearfield County. A true and correct copy of the legal description of said property is marked as Exhibit "A", attached hereto and made a part hereof.
4. At the time of the Sheriff Sale, Defendants were occupying the Premises.
5. Plaintiff, by virtue of said Sheriff's Sale, is the owner of the Premises and therefore right to immediate possession and title to the Premises is in Plaintiff and not in Defendants.

6. On April 14, 2004, counsel for Plaintiff sent written notice to the Defendants to vacate the Premises on or before April 29, 2004. A true and correct copy of said Notices are marked Exhibit "B", attached hereto and made a part hereof.

7. Defendants are unjustly and unlawfully occupying, using and enjoying the Premises without right and to the detriment of Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendants for possession of the Premises known as 316 Pine Street, Curwensville, PA, 16833, together with such other relief as this Honorable Court may deem necessary.

GRENEN & BIRSIC, P.C.

BY:


Kristine M. Anthou, Esquire
PA ID. #77991
Attorneys for Plaintiff
Nine West, One Gateway Center
Pittsburgh, PA 15222
(412) 281-7650

Exhibit "A"

ALL that certain lot or piece of ground, including improvements, situated in the Borough of Curwensville, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post at corner of Pine Street and an alley, at rear of lot now or formerly of Dr. G.C. Jenkins, thence by said alley westward, one hundred and ninety (190) feet to a post on alley, thence by said alley southward, forty-two (42) feet to a post at corner of lot now or formerly of Ned Bloom, thence by said lot eastward one hundred ninety (190) feet to a post on Pine Street, thence by Pine Street northward, forty-two (42) feet, to a post and place of beginning.

Exhibit "B"

GRENEN & BIRSIĆ, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER
NINE WEST
PITTSBURGH, PA 15222
(412) 281-7650
FAX (412) 281-7657

EMAIL KANTHOU@GRENENBIRSIĆ.COM

April 14, 2004

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
AND
FIRST CLASS MAIL, POSTAGE PREPAID

Ricky A. Bloom or
Current Occupant
316 Pine Street
Curwensville, PA 16833

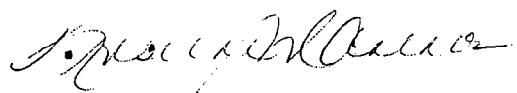
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Very truly yours,



Kristine M. Anthou

U.S. POSTAL SERVICE	CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	
Received From:	

Gretchen & Rickie, R.R.	
One Gateway Center, Nine-West	
Pittsburgh, PA 15222	
75-Suburbia, APR 14 2004	
One piece of ordinary mail addressed to: Ricky A. Bloom or Current OCC	
316 Pine Street	
Curwensville, PA 16833	

PS Form 3817, January 2001

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT	
*Domestic Mail Only; No Insurance Coverage Provided	
For delivery information visit our website at www.usps.com ®	
TT90 9058 5000 0922 E002	Postage
	Certified Fee
	Return Receipt Fee (Endorsement Required)
	Restricted Delivery Fee (Endorsement Required)
	Total Postage & Fees \$ 4.42

Postmark Here

Send To Street, Apt. No., or PO Box No. City, State, ZIP+	Ricky A. Bloom or Current OCC 316 Pine Street Curwensville, PA 16833
--	--

PS Form 3800, June 2002

See Reverse for Instructions

Ricky A. Bloom or
Current occupant
316 Pine Street
Curwensville, PA 16833

2. Article Number

7003 2260 0005 8506 0611
(Transfer from service label)

PS Form 3811, August 2001
Domestic Return Receipt

102595-02-M-1540

SENDER: COMPLETE THIS SECTION	
■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.	
■ Print your name and address on the reverse so that we can return the card to you.	
■ Attach this card to the back of the mailpiece, or on the front if space permits.	
1. Article Addressed to:	
Ricky A. Bloom or Current occupant 316 Pine Street Curwensville, PA 16833	
2. Article Number (Transfer from service label)	
7003 2260 0005 8506 0611	
3. Service Type	
<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.	
4. Restricted Delivery? (Extra Fee)	
<input type="checkbox"/> Yes	

GRENNEN & BIRSCIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER
NINE WEST
PITTSBURGH, PA 15222
(412) 281-7650
FAX (412) 281-7657
EMAIL KANTHOU@GRENNENBIRSCIC.COM

April 14, 2004

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
AND
FIRST CLASS MAIL, POSTAGE PREPAID

Dalinda A. Bloom or
Current Occupant
316 Pine Street
Curwensville, PA 16833

RE: NOTICE TO VACATE

Dear Mrs. Bloom
or Current Occupant:

As you may be aware, this firm represents Chase Manhattan Mortgage Corporation in connection with the above-captioned matter. As you may also be aware, Chase purchased the property at a sale conducted by the Sheriff of Clearfield County on April 2, 2004. Accordingly, Chase is now the record title owner of the property.

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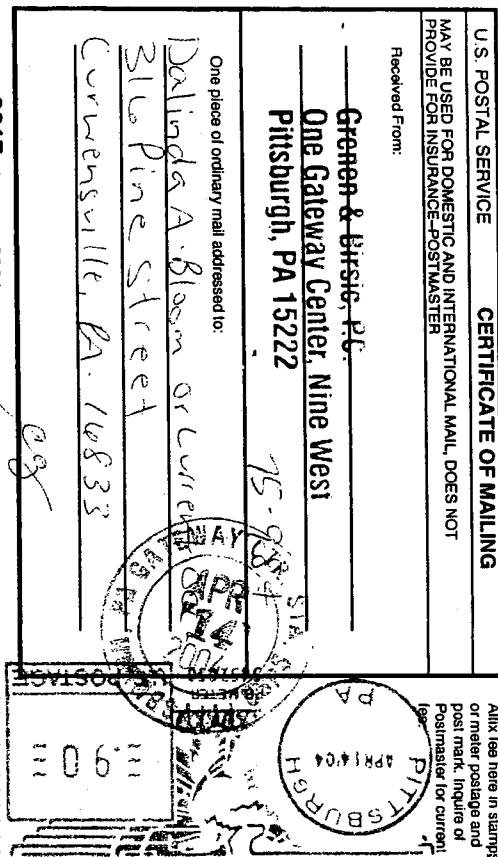
Very truly yours,



Kristine M. Anthou

U.S. POSTAL SERVICE	CERTIFICATE OF MAILING
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMASTER	
Received From:	
Gretchen & Birsig, P.C.	
One Gateway Center, Nine West	
Pittsburgh, PA 15222	

Alix, fee here in stamps
or master postage and
post mark. Inquire of
Postmaster for current
fee.



PS Form 3817, January 2001

**U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT**
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees		\$ 7.92

Postmark
Here

Send to
Street, Apt. No.;
or PO Box No.

316 Pine Street
Curwensville, PA 16833

City, State, ZIP+4

PS Form 3800, June 2002

See Reverse for Instructions

Dalinda A. Bloom or
Current occupant
316 Pine Street
Curwensville, PA 16833

2. Article Number

(Transfer from service label) 7003 2260 0005 8506 0000

PS Form 3811, August 2001 Domestic Return Receipt

102595-02-M-1540

VERIFICATION

The undersigned, and duly authorized representative of Plaintiff, deposes and says subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities that the facts set forth in the foregoing Complaint in Ejectment are true and correct to his information and belief.



STEPHEN STROBEL
ASSISTANT SECRETARY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
CORPORATION,

Plaintiff,

vs.

RICKY A. BLOOM and
DALINDA A. BLOOM,

Defendants.

TO DEFENDANT

You are hereby notified to plead
to the ENCLOSED COMPLAINT WITHIN
TWENTY (20) DAYS FROM SERVICE HEREOF

Kristine M. Anthou
ATTORNEY FOR PLAINTIFF

I HEREBY CERTIFY THAT THE ADDRESS
OF THE PLAINTIFF IS:
75 Fairway Drive
Vernon Hills, IL 60061

AND THE DEFENDANT IS:
316 Pine Street
Curwensville, PA 16833

Kristine M. Anthou
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF LOCATION
I HEREBY CERTIFY THAT THE LOCATION OF THE
REAL ESTATE AFFECTED BY THIS LIEN IS
316 Pine Street, Borough of Curwensville

(CITY, BORO, TOWNSHIP) (WARD)

Kristine M. Anthou
ATTORNEY FOR PLAINTIFF

CIVIL DIVISION

NO.: 04-627-4

TYPE OF PLEADING

CIVIL ACTION-COMPLAINT
IN EJECTMENT

FILED ON BEHALF OF PLAINTIFF:
Chase Manhattan Mortgage Corporation

COUNSEL OF RECORD FOR THIS
PARTY:

Kristine M. Anthou, Esquire
Pa. I.D. #77991

GRENNEN & BIRSCIC, P.C.
One Gateway Center
9 West
Pittsburgh, PA 15222
(412) 281-7650

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

MAY 05 2004

Attest.

William A. Brown
Prothonotary/
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
CORPORATION,

CIVIL DIVISION

NO.:

Plaintiff,

vs.

RICKY A. BLOOM and
DALINDA A. BLOOM,

Defendants.

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claim 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.

Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
1(800) 692-7375

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
CORPORATION,

CIVIL DIVISION

NO.:

Plaintiff,

vs.

RICKY A. BLOOM and
DALINDA A. BLOOM,

Defendants.

CIVIL ACTION - COMPLAINT IN EJECTMENT

Chase Manhattan Mortgage Corporation, by its attorneys, Grenen & Birsic, P.C., files this
Complaint in Ejectment, as follows:

1. Plaintiff is a lending institution duly authorized to conduct business in the Commonwealth
of Pennsylvania with a place of business located at 3415 Vision Drive, Columbus, OH, 43219-6009.
2. The Defendants, Ricky A. Bloom and Dalinda A. Bloom are individuals whose last known
address is 316 Pine Street, Curwensville, PA, 16833.
3. On or about April 2, 2004, the real property and improvements thereon commonly known
as 316 Pine Street, Curwensville, PA, 16833(hereinafter "Premises") were sold to Plaintiff pursuant
to the Sheriff's Sale in Clearfield County. A true and correct copy of the legal description of said
property is marked as Exhibit "A", attached hereto and made a part hereof.
4. At the time of the Sheriff Sale, Defendants were occupying the Premises.
5. Plaintiff, by virtue of said Sheriff's Sale, is the owner of the Premises and therefore right
to immediate possession and title to the Premises is in Plaintiff and not in Defendants.

6. On April 14, 2004, counsel for Plaintiff sent written notice to the Defendants to vacate the Premises on or before April 29, 2004. A true and correct copy of said Notices are marked Exhibit "B", attached hereto and made a part hereof.

7. Defendants are unjustly and unlawfully occupying, using and enjoying the Premises without right and to the detriment of Plaintiff.

WHEREFORE, Plaintiff demands judgment against Defendants for possession of the Premises known as 316 Pine Street, Curwensville, PA, 16833, together with such other relief as this Honorable Court may deem necessary.

GRENEN & BIRSIC, P.C.

BY:


Kristine M. Anthou, Esquire
PA ID. #77991
Attorneys for Plaintiff
Nine West, One Gateway Center
Pittsburgh, PA 15222
(412) 281-7650

Exhibit “A”

ALL that certain lot or piece of ground, including improvements, situated in the Borough of Curwensville, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post at corner of Pine Street and an alley, at rear of lot now or formerly of Dr. G.C. Jenkins, thence by said alley westward, one hundred and ninety (190) feet to a post on alley, thence by said alley southward, forty-two (42) feet to a post at corner of lot now or formerly of Ned Bloom, thence by said lot eastward one hundred ninety (190) feet to a post on Pine Street, thence by Pine Street northward, forty-two (42) feet, to a post and place of beginning.

Exhibit "B"

GRENEN & BIRSIĆ, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER
NINE WEST
PITTSBURGH, PA 15222
(412) 281-7650
FAX (412) 281-7657

EMAIL KANTHOU@GRENENBIRSIĆ.COM

April 14, 2004

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
AND
FIRST CLASS MAIL, POSTAGE PREPAID

Ricky A. Bloom or
Current Occupant
316 Pine Street
Curwensville, PA 16833

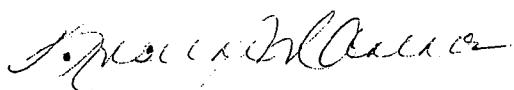
RE: NOTICE TO VACATE

Dear Mr. Bloom
or Current Occupant:

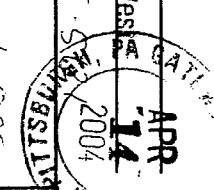
As you may be aware, this firm represents Chase Manhattan Mortgage Corporation in connection with the above-captioned matter. As you may also be aware, Chase purchased the property at a sale conducted by the Sheriff of Clearfield County on April 2, 2004. Accordingly, Chase is now the record title owner of the property.

Our client has recently informed me that you remain on this property. The purpose of this letter is to notify you that you must vacate the premises on or before fifteen (15) days from the date of this letter. If you fail to vacate the premises on or before that date, Chase will institute formal legal action to have you removed from the premises. I trust that such will not be necessary. If you have any questions, please feel free to contact me.

Very truly yours,



Kristine M. Anthou

U.S. POSTAL SERVICE		CERTIFICATE OF MAILING	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMASTER			
Received From:		<input type="text" value="Greement to pay Postage"/> <input type="text" value="One Gateway Center, Nine West"/> <input type="text" value="Pittsburgh, PA 15222"/>	
<input type="text" value="RICKY A. Bloom or Current OCC"/> <input type="text" value="316 Pine Street"/> <input type="text" value="Curwensville, PA 16833"/>		<input type="text" value="APR 14 2004"/> <input type="text" value="PA 15222"/> <input type="text" value="PA POSTAGE"/> 	
Affix postage in stamps or meter postage and post mark. Name of PostMaster for current fee.			

PS Form 3817, January 2001

SENDER: COMPLETE THIS SECTION	
<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>1. Article Addressed to:</p> <p>Ricky A. Bloom or Current occupant 316 Pine Street Curwensville, PA 16833</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7003 2260 0005 8506 0611</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>	

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT			
(Domestic Mail Only; No Insurance Coverage Provided)			
For delivery information visit our website at www.usps.com ®			
Postage	\$		
Certified Fee	\$		
Return Receipt Fee (Endorsement Required)			
Restricted Delivery Fee (Endorsement Required)			
Total Postage & Fees			
\$ 4.42			
Postmark Here			

Sent To	
<input type="text" value="Ricky A. Bloom or Current OCC"/> <input type="text" value="316 Pine Street"/> <input type="text" value="Curwensville, PA 16833"/>	
<input type="text" value="Street, Apt. No.; or PO Box No."/> <input type="text" value="City, State, ZIP+4"/>	
<small>PS Form 8800, June 2002</small>	
<small>See Reverse for Instructions</small>	

GRENNEN & BIRSCIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER
NINE WEST
PITTSBURGH, PA 15222
(412) 281-7650
FAX (412) 281-7657
EMAIL KANTHOU@GRENNENBIRSCIC.COM

April 14, 2004

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
AND
FIRST CLASS MAIL, POSTAGE PREPAID

Dalinda A. Bloom or
Current Occupant
316 Pine Street
Curwensville, PA 16833

RE: NOTICE TO VACATE

Dear Mrs. Bloom
or Current Occupant:

As you may be aware, this firm represents Chase Manhattan Mortgage Corporation in connection with the above-captioned matter. As you may also be aware, Chase purchased the property at a sale conducted by the Sheriff of Clearfield County on April 2, 2004. Accordingly, Chase is now the record title owner of the property.

Our client has recently informed me that you remain on this property. The purpose of this letter is to notify you that you must vacate the premises on or before fifteen (15) days from the date of this letter. If you fail to vacate the premises on or before that date, Chase will institute formal legal action to have you removed from the premises. I trust that such will not be necessary. If you have any questions, please feel free to contact me.

Very truly yours,



Kristine M. Anthou

U.S. POSTAL SERVICE**CERTIFICATE OF MAILING**

MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL. DOES NOT PROVIDE FOR INSURANCE. POSTMASTER

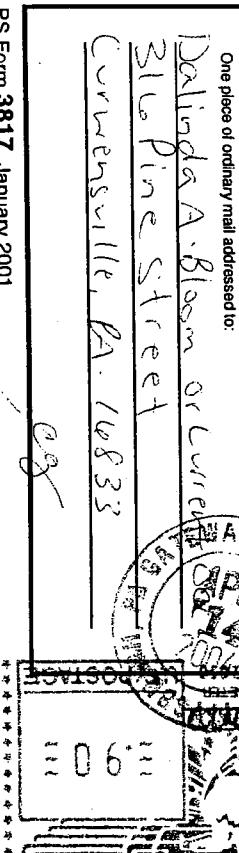
Received From:

Greer & Busic, P.C.**One Gateway Center, Nine West****Pittsburgh, PA 15222**

75-985-1111

One piece of ordinary mail addressed to:

Dalinda A. Bloom or Current
314 Pine Street
Curwensville, PA 16833



PS Form 3817, January 2001

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

COMPLETE THIS SECTION ON DELIVERY

A. Signature	X <i>Jonathan Bloom</i>	
B. Received by (Printed Name)		C. Date of Delivery
<i>J. Bloom</i>		<i>4/16/04</i>
D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
If YES, enter delivery address below:		

1. Article Addressed to:

Dalinda A. Bloom or
Current Occupant
314 Pine Street
Curwensville, PA 16833

2. Article Number

(Transfer from service label)

7003 2260 0005 8506 0888

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-14-1540

Attach fee here in stamps
or meter postage and
post mark. Inquire of
Postmaster for current
fee.

Postmark
Here

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	1.92

Send To
Street, Apt. No.,
or PO Box No.
314 Pine Street
Curwensville, PA 16833
City, State, ZIP+4

PS Form 3800, June 2002

See Reverse for Instructions

VERIFICATION

The undersigned, and duly authorized representative of Plaintiff, deposes and says subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities that the facts set forth in the foregoing Complaint in Ejectment are true and correct to his information and belief.



STEPHEN STROBEL
ASSISTANT SECRETARY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO
CC
(60)
m11056X
2010
A. Shaw
Clark of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

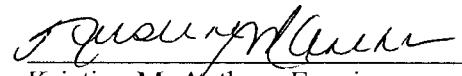
CHASE MANHATTAN MORTGAGE) CIVIL DIVISION
CORPORATION,)
Plaintiff,) NO.: 2004-00627-CD
vs.)
RICKY A. BLOOM and)
DALINDA A. BLOOM,)
Defendants.)

PRAECIPE TO SETTLE AND DISCONTINUE WITHOUT PREJUDICE

PROTHONTARY:

Kindly settle and discontinue without prejudice the above-captioned matter and mark the docket accordingly.

Respectfully Submitted:



Kristine M. Anthou, Esquire
Grenen & Birsic, P.C.
One Gateway Center
Ninth Floor
Pittsburgh, PA 15222
(412) 281-7650

Sworn and subscribed before

This 29th day of March, 2010



Patricia A. Townsend
Notary Public

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Patricia A. Townsend, Notary Public
City of Pittsburgh, Allegheny County
My Commission Expires June 2, 2011

Member, Pennsylvania Association of Notaries