

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


ATTORNEY FOR PLAINTIFF

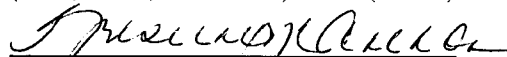
I HEREBY CERTIFY THAT THE ADDRESS
OF THE PLAINTIFF IS:
75 Fairway Drive
Vernon Hills, IL 60061

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


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)


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

GRENN & BIRSIC, 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.

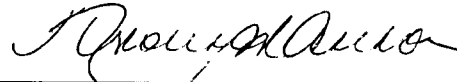
6. On April 14, 2004, counsel for Plaintiff sent written notice to the Defendants to vacate the Premises on or before April 29, 2004. A true and correct copy of said Notices are marked Exhibit "B", attached hereto and made a part hereof.

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”

GRENN & BIRSIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER

NINE WEST

PITTSBURGH, PA 15222

(412) 281-7650

FAX (412) 281-7657

EMAIL KANTHOU@GRENNBIRSIC.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

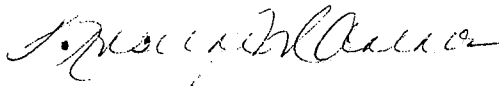
RE: NOTICE TO VACATE

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:

Gretna & Linn, Inc.
One Gateway Center, Nine West
Pittsburgh, PA 15222

One piece of ordinary mail addressed to:

Ricky A. Bloom or Current OCC
316 Pine Street
Curtwensville, 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.

1. Article Addressed to:

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

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☐ Agent
Jonathan Blum ☐ Addressee
- B. Received by (Printed Name) ☐ Agent
J ☐ Addressee
- C. Date of Delivery
4/16/04
- D. Is delivery address different from item 1? ☐ Yes ☐ No
If YES, enter delivery address below:

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-M-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

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$4.42

Postmark Here

Sent To
Ricky A. Bloom or Current OCC
Street, Apt. No., or PO Box No. 316 Pine Street
City, State, ZIP+4
Curtwensville, PA 16833

TT90 9058 5000 0922 E002

GRENN & BIRSIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER
NINE WEST
PITTSBURGH, PA 15222
(412) 281-7650
FAX (412) 281-7657
EMAIL KANTHOU@GRENNBIRSIC.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: Green & Ursic, PC
One Gateway Center, Nine West
Pittsburgh, PA 15222

One piece of ordinary mail addressed to:
Dalinda A. Bloom or Current occupant
316 Pine Street
Cumwensville, PA 16833

PS Form 3817, January 2001

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

PITTSBURGH PA 15204
 APR 14 2004
 15-9884

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	\$ 9.92

Postmark Here

Sent To: Dalinda A. Bloom or Current occupant
Street, Apt. No., or PO Box No. 316 Pine Street
City, State, ZIP+4 Cumwensville, PA 16833

PS Form 3800, June 2002 See Reverse for Instructions

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature Dalinda Bloom ☐ Agent

B. Received by (Printed Name) [Signature] ☐ Addressee

C. Date of Delivery 4/16/04

D. Is delivery address different from item 1? ☒ Yes ☐ No
 If YES, enter delivery address below:

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 0888

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

8800 9058 5000 0922 E002

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

So Answers,

3rd Day Of June 2004
William A. Shaw

Chester A. Hawkins
by Marilyn Hahn
Chester A. Hawkins
Sheriff

FILED

JUN 03 2004

0/10:48 am

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
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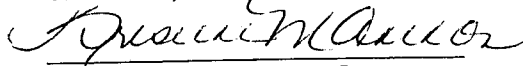
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ATTORNEY FOR PLAINTIFF

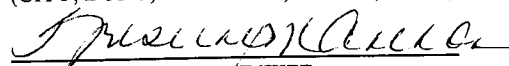
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OF THE PLAINTIFF IS:
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Vernon Hills, IL 60061

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


ATTORNEY FOR PLAINTIFF

CERTIFICATE OF LOCATION
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REAL ESTATE AFFECTED BY THIS LIEN IS
316 Pine Street, Borough of Curwensville

(CITY, BORO, TOWNSHIP) (WARD)


ATTORNEY FOR PLAINTIFF

CIVIL DIVISION

NO.: 04-627-CD

TYPE OF PLEADING

CIVIL ACTION-COMPLAINT
IN EJECTMENT

FILED ON BEHALF OF PLAINTIFF:
Chase Manhattan Mortgage Corporation

COUNSEL OF RECORD FOR THIS
PARTY:

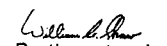
Kristine M. Anthou, Esquire
Pa. I.D. #77991

GRENN & BIRSIC, 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.


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.

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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.

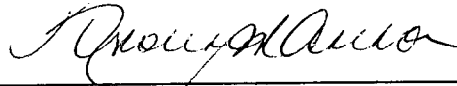
6. On April 14, 2004, counsel for Plaintiff sent written notice to the Defendants to vacate the Premises on or before April 29, 2004. A true and correct copy of said Notices are marked Exhibit "B", attached hereto and made a part hereof.

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.

GRENNEN & 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"

GRENNEN & BIRSIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER

NINE WEST

PITTSBURGH, PA 15222

(412) 281-7650

FAX (412) 281-7657

EMAIL KANTHOU@GRENNENBIRSIC.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

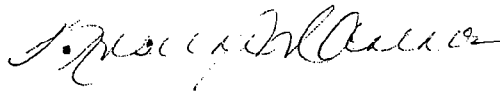
RE: NOTICE TO VACATE

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or Current Occupant:

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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: Greent & Dineen, LLC
One Gateway Center Nine West
Pittsburgh, PA 15222

One piece of ordinary mail addressed to:
Ricky A. Bloom or Current OCC
316 Pine Street
Curwensville, PA 16833

APR 14 2004
 PITTSBURGH, PA
 75-544-1111

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

SPECIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$4.42

Postmark Here

Sent To: Ricky A. Bloom or Current OCC
 Street, Apt. No., or PO Box No. 316 Pine Street
 City, State, ZIP+4 Curwensville, PA 16833

PS Form 3800, June 2002 See Reverse for Instructions

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature X Jonathan Bloom ☐ Agent ☐ Addressee

B. Received by (Printed Name) J C. Date of Delivery 4/16/04

D. Is delivery address different from item 1? ☐ Yes ☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No

2. Article Number 7003 2260 0005 8506 0611
 (Transfer from service label)

PS Form 3811, August 2001 Domestic Return Receipt

102595-02-M-1540

1190 9059 5000 0922 E002

GRENN & BIRSIC, P.C.

ATTORNEYS AT LAW

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

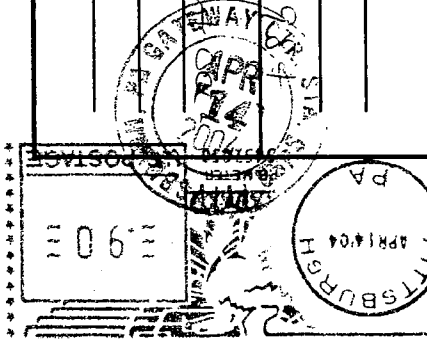
Green & Hirsch, P.C.
One Gateway Center, Nine West
Pittsburgh, PA 15222

One piece of ordinary mail addressed to:

Dalinda A. Bloom or Current occupant
316 Pine Street
Currwensville, Pa. 16833

PS Form 3817, January 2001

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



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:

Dalinda A. Bloom or
Current occupant
316 Pine Street
Currwensville, Pa. 16833

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent ☐ Addressee
Janethun Blum
- B. Received by (Printed Name) ☐ C. Date of Delivery
4/16/04
- D. Is delivery address different from item 1? ☒ Yes ☐ No
 If YES, enter delivery address below:

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 0888

PS Form 3811, August 2001

Domestic Return Receipt

102595-02-M-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

ORIGINAL COPY

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 9.92

Postmark
 Here

Sent To
Dalinda A. Bloom or Current occ
 Street, Apt. No.,
 or PO Box No. **316 Pine Street**
 City, State, ZIP+4
Currwensville, Pa. 16833

PS Form 3800, June 2002

See Reverse for Instructions

9900 9059 5000 0922 E002

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


ATTORNEY FOR PLAINTIFF

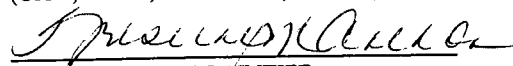
I HEREBY CERTIFY THAT THE ADDRESS
OF THE PLAINTIFF IS:
75 Fairway Drive
Vernon Hills, IL 60061

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


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)


ATTORNEY FOR PLAINTIFF

CIVIL DIVISION

NO.: 04-627-40

TYPE OF PLEADING

CIVIL ACTION-COMPLAINT
IN EJECTMENT

FILED ON BEHALF OF PLAINTIFF:
Chase Manhattan Mortgage Corporation

COUNSEL OF RECORD FOR THIS
PARTY:

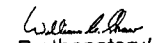
Kristine M. Anthou, Esquire
Pa. I.D. #77991

GRENN & BIRSIC, 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.


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.

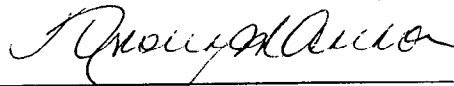
6. On April 14, 2004, counsel for Plaintiff sent written notice to the Defendants to vacate the Premises on or before April 29, 2004. A true and correct copy of said Notices are marked Exhibit "B", attached hereto and made a part hereof.

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.

GRENNEN & 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"

GRENN & BIRSIC, P.C.

ATTORNEYS AT LAW

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

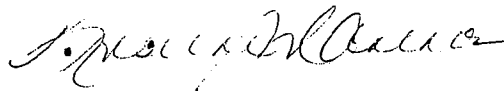
RE: NOTICE TO VACATE

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: Green & Bros, Inc.
One Gateway Center, Nine West
Pittsburgh, PA 15222

One piece of ordinary mail addressed to:
Ricky A. Bloom or Current OCC
316 Pine Street
Curwensville, PA 16833

APR 14 2004
 PITTSBURGH, PA
 54.90

APR 14 2004
 PITTSBURGH, PA
 54.90

APR 14 2004
 PITTSBURGH, PA
 54.90

PS Form 3817, January 2001

U.S. Postal ServiceTM CERTIFIED MAILTM 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: Ricky A. Bloom or Current OCC
Street, Apt. No., or PO Box No. 316 Pine Street
City, State, ZIP+4 Curwensville, PA 16833

PS Form 3800, June 2002 See Reverse for Instructions

TT90 9059 5000 0922 E002

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

COMPLETE THIS SECTION ON DELIVERY

- A. Signature X Jonathan Blom ☐ Agent ☐ Addressee
- B. Received by (Printed Name) J C. Date of Delivery 4/16/04
- D. Is delivery address different from item 1? ☐ Yes ☐ No
- If YES, enter delivery address below:

3. Service Type
- ☐ Certified Mail ☐ Express Mail
- ☐ Registered ☐ Return Receipt for Merchandise
- ☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No

2. Article Number (Transfer from service label)

7003 2260 0005 8506 0611

PS Form 3811, August 2001

Domestic Return Receipt

102586-02-M-1540

GRENN & BIRSIC, P.C.

ATTORNEYS AT LAW

ONE GATEWAY CENTER
NINE WEST
PITTSBURGH, PA 15222 ,
(412) 281-7650
FAX (412) 281-7657
EMAIL KANTHOU@GRENNBIRSIC.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 & Birnie, PC One Gateway Center, Nine West Pittsburgh, PA 15222	
One piece of ordinary mail addressed to:	
Dalinda A. Bloom or Current occupant 316 Pine Street Currensville, PA 16833	
PS Form 3817, January 2001	

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

PITTSBURGH PA 15222
APR 14 2004

9.90

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 \$	Postmark Here
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 9.92
Send To Dalinda A. Bloom or Current occupant Street, Apt. No., or PO Box No. 316 Pine Street City, State, ZIP+4 Currensville, PA 16833	
PS Form 3800, June 2002 See Reverse for Instructions	

9980 9059 5000 0922 E002

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:

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

COMPLETE THIS SECTION ON DELIVERY

- A. Signature ☒ Agent ☐ Addressee
B. Received by (Printed Name) C. Date of Delivery
D. Is delivery address different from item 1? ☒ Yes ☐ No
If YES, enter delivery address below:

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 0888
PS Form 3817, August 2001 Domestic Return Receipt 102386-02-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.

) CIVIL DIVISION

) NO.: 2004-00627-CD

) **TYPE OF PLEADING:**

) **PRAECIPE TO SETTLE AND**
) **DISCONTINUE WITHOUT PREJUDICE**

) FILED ON BEHALF OF:
) Chase Manhattan Mortgage Corporation

) COUNSEL OF RECORD OF THIS PARTY:

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

) GRENN & BIRSIC, P.C.
) One Gateway Center
) Ninth Floor
) Pittsburgh, PA 15222
) (412) 281-7650

NO
CC
m/11-05-04
2010
A. Shaw
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CHASE MANHATTAN MORTGAGE
CORPORATION,

Plaintiff,

vs.

RICKY A. BLOOM and
DALINDA A. BLOOM,

Defendants.

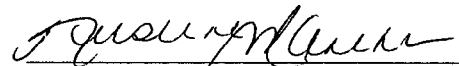
) CIVIL DIVISION
)
) NO.: 2004-00627-CD
)
)
)
)
)
)

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


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