



# GOLDBECK McCAFFERTY & McKEEVER

BY: JOSEPH A. GOLDBECK, JR.

ATTORNEY I.D. #16132

SUITE 5000 – MELLON INDEPENDENCE CENTER.

701 MARKET STREET

PHILADELPHIA, PA 19106

(215) 627-1322

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS INC.

9441 LBJ Freeway

Suite 350

Dallas, TX 75243

*Plaintiff*

vs.

JENNIFER SUHONEY

**Mortgagor(s) and Real Owner(s)**

Box 72

Smokerun, PA 16681

*Defendant(s)*

IN THE COURT OF COMMON PLEAS

OF CLEARFIELD COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term

No.

2004-642-CN

**CIVIL ACTION: MORTGAGE  
FORECLOSURE**

**THIS FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT  
A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU  
WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

## 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 the 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 claim 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. 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.

PENNSYLVANIA BAR ASSOCIATION

P.O. Box 186

Harrisburg, PA 17108

800-692-7375

KEYSTONE LEGAL SERVICES

211 1/2 E. Locust Street

Clearfield, PA 16830

814-765-9646

## AVISO

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESSARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESSARIO QUE USTED, O SU ABOGADO, REGISTRE CON LA CORTE EN FORMA ESCRITA, EL PUNTO DE VISTA DE USTED Y CUALQUIER OBJECCION CONTRA LAS QUEJAS EN ESTA DEMANDA.

RECUERDE: SI USTED NO REPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIRA QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELÉFONO LA OFICINA FIJADA AQUÍ ABAJO. ESTA OFICINA PUEDE PROVEERÉ CON INFORMACION DE COMO CONSEUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ÉSTA OFICINA PUEDE PROVEERÉ INFORMACION ACERCA AGENCIAS QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

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211 1/2 E. Locust Street

Clearfield, PA 16830

814-765-9646

**FILED**

MAY 10 2004

m / 11:30 / w  
William A. Shaw  
Prothonotary  
1 CENT TO WTT  
2 CENT TO SHFE

## COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff is MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC., 9441 LBJ Freeway, Suite 350, Dallas, TX 75243.
2. The name and address of the Defendant is JENNIFER SUHONEY, Box 86, Smokerun, PA 16681, who is the mortgagor and real owner of the mortgaged premises hereinafter described.
3. On November 21, 2002 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to ALLIED MORTGAGE GROUP, which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Instrument #200218974. The mortgage has not been assigned unless said assignment to the Plaintiff is hereafter mentioned. The aforementioned mortgage was assigned to: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC. by Assignment of Mortgage, which assignment is lodged for recording. These documents are matters of public record and are incorporated herein by reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g).
4. Plaintiff MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC. is or will be, the owner of legal title to the mortgage that is the subject of this action, and is nominee for Homeq Servicing Corporation f/k/a TMS Mortgage Inc., which is the owner of the entire beneficial interest in the mortgage.
5. The premises subject to said mortgage is described as attached.
6. The mortgage is in default because monthly payment of principal and interest upon said mortgage due January 01, 2004, and each month thereafter are due and unpaid, and by the terms of said mortgage, upon default in such payments for a period of one month, the entire principal balance and all interest due thereon are collectible forthwith.
7. The following amounts are due on the mortgage:

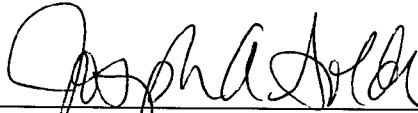
Principal Balance	\$43,416.31
Interest from 12/01/2003	\$1,672.00
through 04/30/2004 at 9.2500%	
Per Diem interest rate at \$11.00	
Attorney's Fee at 5.0% of Principal Balance	\$2,170.82
Late Charges from 01/01/2004 to 04/30/2004	\$197.78
Monthly late charge amount at \$17.98	
Costs of suit and Title Search	\$900.00
	<hr/>
	\$48,356.91
Suspense	-\$43.14
Escrow	+\$223.29
Check fees	+\$15.00
Corporate advance	+\$111.19
Monthly Escrow amount \$97.35	
	<hr/> <hr/>
	\$48,663.25

8. The Attorney's Fees set forth above are in conformity with the Mortgage documents and Pennsylvania law, and, will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale reasonable Attorney's Fees will be charged based on work actually performed.

9. Notice of Intention to Foreclose and a Notice of Homeowners' Emergency Mortgage Assistance has been sent to Defendant(s) by Certified and regular mail, as required by Act 160 of 1998 of the Commonwealth of Pennsylvania, on the date(s) set forth in the true and correct copy of such notice(s) attached hereto as Exhibit "A". The Defendant(s) has/have not had the required face-to-face meeting within the required time and Plaintiff has no knowledge of any such meeting being requested by the Defendant(s) through the Plaintiff, the Pennsylvania Housing Finance Agency, or any appropriate Consumer Credit Counseling Agency.

WHEREFORE, Plaintiff demands an in rem judgment in mortgage foreclosure in the sum of \$48,663.25, together with interest at the rate of \$11.00, per day and other expenses incurred by the Plaintiff which are properly chargeable in accordance with the terms of the mortgage, and for the foreclosure and sale of the mortgaged premises.

By: \_\_\_\_\_



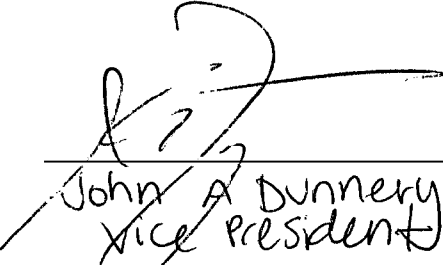
**GOLDBECK McCAFFERTY & McKEEVER**

By: JOSEPH A. GOLDBECK, JR., ESQUIRE  
ATTORNEY FOR PLAINTIFF

VERIFICATION

I, John A Dunnery, as the representative of the Plaintiff corporation within named do hereby verify that I am authorized to and do make this verification on behalf of the Plaintiff corporation and the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: April 29, 2004

  
\_\_\_\_\_  
John A Dunnery  
Vice President

#320068604 - JENNIFER SUHONEY

## **EXHIBIT "A"**

**ALL that certain plot or piece of ground located on the West side of State Highway in the Village of Smoke Run, Bigler Township, Clearfield County, Pennsylvania, which was designated as Lots Numbered 4, 5, and 6 by a predecessor in title in the plot or plan of the Village of Beyer, and bounded and described as follows:**

**BEGINNING at the South West corner of the intersection of Centre Street and State Highway; thence North 28 ½ degrees West along Centre Street one hundred and fifty (150) feet to an alley; thence South 61 ½ degrees West along said Alley one hundred and fifty (150) feet to another Alley; thence South 28 ½ degrees East along last mentioned Alley one hundred and fifty (150) feet to State Highway; thence North 61 ½ degrees East along said State Highway one hundred and fifty (150) feet to corner at Centre Street and place of beginning. MAP #103-K15-496-00025.**

**BEING the same premises conveyed by Betty Tutokey, a widow, and Genevieve Lehmier, a widow, to Jennifer Suhoney, an individual, by deed dated November 21, 2002 and recorded November 21, 2002, in Clearfield County, at Instrument Number**

\_\_\_\_\_.

DF785

JENNIFER SUHONEY

BOX 72  
SMOKERUN, PA 16681

February 3, 2004  
0320068604

**EXHIBIT A**

NBRC

# **ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE**

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

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

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

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

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

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

**HomeEq Servicing Corporation is a debt collector. HomeEq is attempting to collect a debt and any information obtained will be used for that purpose.**

**SEE LAST PAGE FOR ADDITIONAL IMPORTANT DISCLOSURES**

**THIS NOTICE CONTINUES ON THE NEXT PAGE**



**WACHOVIA**

# HOMEQ SERVICING

DF785

JENNIFER SUHONEY

BOX 86  
SMOKERUN, PA 16681

February 3, 2004  
0320068604

NBRC

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**SEE LAST PAGE FOR ADDITIONAL IMPORTANT DISCLOSURES**

**THIS NOTICE CONTINUES ON THE NEXT PAGE**



WACHOVIA



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

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

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

**TEMPORARY STAY OF FORECLOSURE**

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

**CONSUMER CREDIT COUNSELING AGENCIES**

If you attend a face-to-face meeting with one of the consumer credit counseling agencies listed at the end of this notice, the lender may NOT take further action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer counseling agencies for the county in which your property is located are set forth at the end of this notice. It is necessary to schedule only one face-to-face meeting. You should advise this lender/servicer **immediately** of your intentions.

**APPLICATION FOR MORTGAGE ASSISTANCE**

Your mortgage is in default for the reasons set forth later in this notice (see the following pages for specific information about the nature of your default). If you have tried and are unable to resolve this problem with the lender/servicer, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Fund. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a completed application to the Pennsylvania Housing Finance Agency. Your application **MUST** be filed or postmarked within thirty (30) days of your face-to-face meeting.

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

**AGENCY ACTION**

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

***THIS NOTICE CONTINUES ON THE NEXT PAGE***

**NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATIONAL PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT.**

**If you have filed bankruptcy you can still apply for Emergency Mortgage Assistance.**

**NATURE OF THE DEFAULT**

The MORTGAGE debt secured by your property located at:

BOX 72 SMOKERUN, PA 16681

IS SERIOUSLY IN DEFAULT because:

1. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following months and the following amounts are now past due:

a) Number of Payments Delinquent:	3
b) Delinquent Amount Due:	\$1,370.58
c) Late Charges:	\$143.84
d) Recoverable Corporate Advances:	\$4.75
e) Other Charges and Advances:	\$0.00
f) Less funds in Suspense:	\$0.00
g) Total amount required as of (due date):	<b>\$1,519.17</b>

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

**HOW TO CURE THE DEFAULT** – You may cure this default within THIRTY (30) days from the date of this letter **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER/SERVICER, WHICH IS \$1,370.58 PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES (and other charges) WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cashier's check, certified check, or money order made payable to:**

Regular Mail  
HomEq Servicing Corporation  
P.O. Box 96012 Charlotte, NC 28296-0012

Overnight  
Attn: Cash Central NC 4726  
1100 Corporate Center Drive  
Raleigh, NC 27607-5066

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this notice: (Do not use if not applicable)

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*THIS NOTICE CONTINUES ON THE NEXT PAGE*

**IF YOU DO NOT CURE THE DEFAULT**

If you do not cure the default within THIRTY (30) days of this notice, the lender/servicer intends to exercise its rights to accelerate the mortgage debt. This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the opportunity to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within THIRTY (30) DAYS OF THE DATE OF THIS LETTER, HomEq Servicing Corporation also intends to instruct its attorneys to start a legal action to foreclose upon your mortgaged property.

**IF THE MORTGAGE IS FORECLOSED UPON**

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

**OTHER LENDER/SERVICER REMEDIES**

The lender/servicer may also sue you personally for the unpaid principal balance and all other sums due under the Mortgage.

**RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE**

If you have not cured the default within the THIRTY (30) day period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the total amount then past due plus any late charges, other charges then due, reasonable attorneys' fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender/servicer and by performing any other requirements under the mortgage. **Curing your default in the manner set forth in this Notice will restore your mortgage to the same position as if you had never defaulted.**

**EARLIEST POSSIBLE SHERIFF'S SALE DATE**

It is estimated that the earliest date that such Sheriff's sale could be held would be **approximately five (5) months from the date of this notice.** A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. The amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender/servicer.

**HOW TO CONTACT THE LENDER/SERVICER BY TELEPHONE OR MAIL:**

Name of Lender/Servicer	HomEq Servicing Corporation
Address	Attn: Account Research, Mail Code CA3345 P.O. Box 13716 Sacramento, CA 95853
Telephone Number:	1-800-795-5125

**EFFECT OF SHERIFF'S SALE**

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

**ASSUMPTION OF MORTGAGE**

You may not sell or transfer your home to a buyer or transferee who will assume the mortgage debt.

***THIS NOTICE CONTINUES ON THE NEXT PAGE***

**YOU MAY ALSO HAVE THE RIGHT**

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

THE CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY ARE  
ATTACHED TO THIS LETTER

If you received a discharge of the account through the Bankruptcy Court and if your account has not been reaffirmed, the acceleration and sale will not result in your being held personally liable for the debt and this letter is not an attempt to collect a personal debt. However, failure to pay the delinquent balance is necessary to avoid foreclosure.

You are notified that this default, and any other legal action that may occur as a result thereof, may be reported by HomEq to one or more credit reporting agencies.

Please take appropriate action with respect to the important matters discussed herein.

Sincerely,

HomEq Servicing Corporation

***THIS NOTICE CONTINUES ON THE NEXT PAGE***

## **IMPORTANT DISCLOSURES**

### **Colorado**

Collection agencies are licensed by the Colorado Collection Agency Board, 1525 Sherman Street, 5<sup>th</sup> Floor, Denver, Colorado 80203. Please do not send payments to the collection agency board.

### **Minnesota**

This collection agency is licensed by the Minnesota Department of Commerce.

### **Nebraska**

Any credit insurance issued in connection with the loan contract may be canceled unless the borrower cures the default.

### **New York City**

Collection Agency License: #1099500 – North Highlands, CA (Main office)  
#1099501 – Raleigh, NC (Branch)  
#1099512 – Boone, NC (Branch)

### **North Carolina**

North Carolina Department of Insurance Permit: #3677 – North Highlands, CA (Main office)  
#3676 – Raleigh, NC (Branch)  
#3675 – Boone, NC (Branch)

### **Tennessee**

This collection agency is licensed by the Collection Service Board, State Department of Commerce and Industry, 500 James Robertson Parkway, Nashville, Tennessee 37243

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

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC

Sheriff Docket #

15547

VS.

04-642-CD

SUHONEY, JENNIFER

COMPLAINT ACTION OF MORTGAGE FORECLOSURE

**SHERIFF RETURNS**

NOW MAY 19, 2004 AT 1:48 PM SERVED THE WITHIN COMPLAINTS IN MORTGAGE FORECLOSURE ON JENNIFER SUHONEY, DEFENDANT AT RESIDENCE, BOX 86, SMOKE RUN, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JENNIFER SUHONEY (2)TWO TRUE AND ATTESTED COPIES OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: DAVIS/MORGILLO

**Return Costs**

Cost	Description
58.87	SHERIFF HAWKINS PAID BY: ATT CK# 199223
20.00	SURCHARGE PAID BY: ATT CK# 199651

Sworn to Before Me This

4th Day Of June 2004

William A. Shaw

So Answers,

Chester A. Hawkins  
by Marilyn Hamr

Chester A. Hawkins  
Sheriff

**FILED**

JUN 04 2004

01:30 p.m.

William A. Shaw  
Prothonotary

KB

no cc

GOLDBECK McCAFFERTY & McKEEVER  
BY: Joseph A. Goldbeck, Jr.  
Attorney I.D. #16132  
Suite 500 – The Bourse Bldg.  
111 S. Independence Mall East  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS INC.  
9441 LBJ Freeway  
Suite 350  
Dallas, TX 75243

Plaintiff

vs.

JENNIFER SUHONEY  
**(Mortgagor(s) and Record owner(s))**  
Box 72  
Smokerun, PA 16681

Defendant(s)

IN THE COURT OF COMMON PLEAS  
of Clearfield County

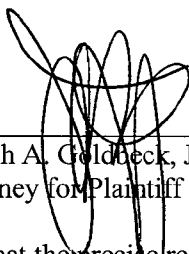
CIVIL ACTION LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2004-642-CD

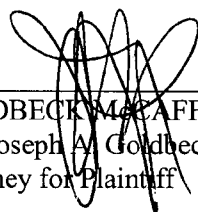
**ORDER FOR JUDGMENT**

Please enter Judgment in favor of MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC., and against JENNIFER SUHONEY for failure to file an Answer in the above action within (20) days (or sixty (60) days if defendant is the United States of America) from the date of service of the Complaint, in the sum of \$49,498.91.



\_\_\_\_\_  
Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

I hereby certify that the above names are correct and that the precise residence address of the judgment creditor is MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC. 9441 LBJ Freeway Suite 350 Dallas, TX 75243 and that the name(s) and last known address(es) of the Defendant(s) is/are JENNIFER SUHONEY, Box 86 Smokerun, PA 16681;



\_\_\_\_\_  
GOLDBECK McCAFFERTY & McKEEVER  
BY: Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

**FILED**

**JUN 28 2004**

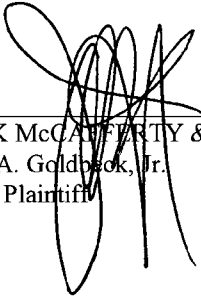
William A. Shaw  
Prothonotary/Clerk of Courts

**ASSESSMENT OF DAMAGES**

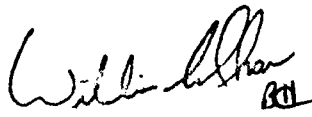
TO THE PROTHONOTARY:

Kindly assess the damages in this case to be as follows:

Principal Balance	\$43,416.31
Interest from 12/01/2003 through 06/24/2004	\$2,277.00
Attorney's Fee at 5.0000% of principal balance	\$2,170.82
Late Charges	\$233.74
Costs of Suit and Title Search	\$900.00
Suspense	\$-43.14
Escrow	\$223.29
Check Fees	\$15.00
Corporate Advance	\$111.19
Escrow Balance Deficit	\$194.70
	<hr/>
	\$49,498.91

  
\_\_\_\_\_  
GOLDBECK McCARTHERY & McKEEVER  
BY: Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

AND NOW, this 28<sup>th</sup> day of June, 2004 damages are assessed as above.

  
\_\_\_\_\_  
Pro Prothy



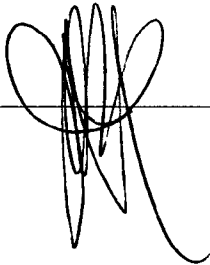
VERIFICATION OF NON-MILITARY SERVICE

The undersigned, as the representative for the Plaintiff corporation within named do hereby verify that I am authorized to make this verification on behalf of the Plaintiff corporation and that the facts set forth in the foregoing verification of Non-Military Service are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

1. That the above named Defendant, JENNIFER SUHONEY, is about unknown years of age, that Defendant's last known residence is Box 86, Smokerun, PA 16681, and is engaged in the unknown business located at unknown address.

2. That Defendant is not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Action of Congress of 1940 and its Amendments.

Date: \_\_\_\_\_

A handwritten signature in black ink, consisting of several loops and a long trailing stroke, is written over the horizontal line following the 'Date:' label.

**In the Court of Common Pleas of Clearfield County**

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC.  
9441 LBJ Freeway  
Suite 350  
Dallas, TX 75243

Plaintiff

vs.

JENNIFER SUHONEY  
(Mortgagor(s) and Record Owner(s))  
Box 72  
Smokerun, PA 16681

Defendant(s)

No. 2004-642-CD

**PRAECIPE FOR JUDGMENT**

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

Enter the Judgment in favor of Plaintiff and against JENNIFER SUHONEY by default for want of an Answer.

Assess damages as follows:

Debt \$49,498.91

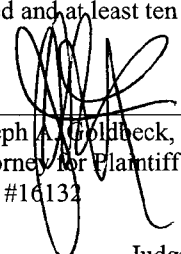
Interest - 12/01/2003 to 06/24/2004

Total

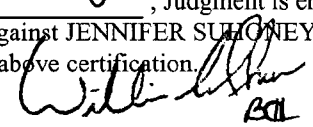
(Assessment of Damages attached)

**I CERTIFY THAT FOREGOING ASSESSMENT OF DAMAGES IS FOR SPECIFIED AMOUNTS ALLEGED TO BE DUE IN THE COMPLAINT AND IS CALCULABLE AS A SUM CERTAIN FROM THE COMPLAINT.**

I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his attorney of record, if any, after the default occurred and at least ten days prior to the date of the filing of this praecipe. A copy of the notice is attached. R.C.P. 237.1

  
\_\_\_\_\_  
Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff  
I.D. #16132

AND NOW June 28, 2004, Judgment is entered in favor of  
MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC. and against JENNIFER SUHONEY by default for want  
of an Answer and damages assessed in the sum of \$49,498.91 as per the above certification.

  
\_\_\_\_\_  
Prothonotary

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO  
COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED  
FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

DATE OF THIS NOTICE: **June 10, 2004**

TO:

**JENNIFER SUHONEY**

Box 86

Smokerun, PA 16681

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC.

9441 LBJ Freeway

Suite 350

Dallas, TX 75243

*Plaintiff*

vs.

**JENNIFER SUHONEY**

(Mortgagor(s) and Record Owner(s))

Box 72

Smokerun, PA 16681

*Defendant(s)*

In the Court of  
Common Pleas  
of Clearfield County

CIVIL ACTION - LAW

Action of  
Mortgage Foreclosure

Term  
No. 2004-642-CD

TO:

**JENNIFER SUHONEY**

Box 86

Smokerun, PA 16681

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

PENNSYLVANIA BAR ASSOCIATION

P.O. Box 186

Harrisburg, PA 17108

800-692-7375

KEYSTONE LEGAL SERVICES

211 1/2 E. Locust Street

Clearfield, PA 16830

814-765-9646

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Joseph A. Goldbeck, Jr., Esq.

Attorney for Plaintiff

Suite 5000 - Mellon Independence Center.

701 Market Street

Philadelphia, PA 19106 215-627-1322

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO  
COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED  
FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

DATE OF THIS NOTICE: **June 10, 2004**

TO:

**JENNIFER SUHONEY**

Box 72

Smokerun, PA 16681

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC.

9441 LBJ Freeway

Suite 350

Dallas, TX 75243

*Plaintiff*

vs.

**JENNIFER SUHONEY**

(Mortgagor(s) and Record Owner(s))

Box 72

Smokerun, PA 16681

*Defendant(s)*

In the Court of  
Common Pleas  
of Clearfield County

CIVIL ACTION - LAW

Action of  
Mortgage Foreclosure

Term  
No. 2004-642-CD

TO:

**JENNIFER SUHONEY**

Box 72

Smokerun, PA 16681

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

PENNSYLVANIA BAR ASSOCIATION

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800-692-7375

KEYSTONE LEGAL SERVICES

211 1/2 E. Locust Street

Clearfield, PA 16830

814-765-9646

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Joseph A. Goldbeck, Jr., Esq.

Attorney for Plaintiff

Suite 5000 - Mellon Independence Center.

701 Market Street

Philadelphia, PA 19106 215-627-1322

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC.  
9441 LBJ Freeway  
Suite 350  
Dallas, TX 75243

Plaintiff

No. 2004-642-CD

vs.

JENNIFER SUHONEY  
(Mortgagors and Record Owner(s))  
Box 72  
Smokerun, PA 16681

Defendant(s)

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT  
OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE  
PURPOSE OF COLLECTING THE DEBT.**

NOTICE

Notice is given that a judgment in the above-captioned matter has been entered against you.

William Shaw  
Prothonotary

By: \_\_\_\_\_

Deputy

If you have any questions concerning the above, please contact:

Joseph A. Goldbeck, Jr.  
**Goldbeck McCafferty & McKeever**  
Suite 500 – The Bourse Bldg.  
111 S. Independence Mall East  
Philadelphia, PA 19106  
215-627-1322

NOTICE OF JUDGMENT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

CIVIL DIVISION

Mortgage Electronic Registration Systems Inc.

Vs.

No. 2004-00642-CD

Jennifer Suhoney

To: DEFENDANT(S)

NOTICE is given that a JUDGMENT in the above captioned matter has been entered against you in the amount of \$49,498.91 on June 28, 2004.

William A. Shaw  
Prothonotary

---

William A. Shaw

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

Mortgage Electronic Registration Systems Inc.  
Plaintiff(s)

No.: 2004-00642-CD

Real Debt: \$49,498.91

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Jennifer Suhoney  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: June 28, 2004

Expires: June 28, 2009

Certified from the record this 28th day of June, 2004.

\_\_\_\_\_  
William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

Received on \_\_\_\_\_, \_\_\_\_\_, of defendant full satisfaction of this Judgment,  
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

\_\_\_\_\_  
Plaintiff/Attorney

PRAECIPE FOR WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)  
P.R.C.P 3180-3183

Joseph A. Goldbeck, Jr.  
Attorney I.D.#16132  
Suite 500 - The Bourse Bldg.  
111 S. Independence Mall East  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS INC.  
9441 LBJ Freeway  
Suite 350  
Dallas, TX 75243

Plaintiff

vs.

JENNIFER SUHONEY  
Mortgagor(s) and Record Owner(s)  
Box 72  
Smokerun, PA 16681

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION – LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2004-642-CD

**PRAECIPE FOR WRIT OF EXECUTION**

TO THE PROTHONOTARY:

Issue Writ of Execution in the above matter:

Amount Due

\$49,498.91

Interest from  
12/01/2003 to  
06/24/2004 at  
9.2500%

(Costs to be added)

*125.00 Prothonotary costs*

GOLDBECK & McKEEVER  
BY: Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

**FILED**

**JUN 28 2004**

William A. Shaw  
Prothonotary/Clerk of Courts



Term  
No. 2004-642-CD  
**IN THE COURT OF COMMON PLEAS**

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS  
INC.

vs.

JENNIFER SUHONEY  
(Mortgagor(s) and Record Owner(s))  
Box 72  
Smokerun, PA 16681

---

**PRAECIPE FOR WRIT OF EXECUTION**  
**(Mortgage Foreclosure)**

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Jospeh A. Goldbeck, Jr.  
Attorney for Plaintiff

---

**Goldbeck McCafferty & McKeever**  
Suite 500 – The Bourse Bldg.  
111 S. Independence Mall East  
Philadelphia, PA 19106  
215-627-1322

**FILED**  
m/4:00 PM  
JUN 28 2004

1002 Le wirts w/ prop descr.  
to Shss

*Shaw*

William A. Shaw  
Prothonotary/Clerk of Courts

Atty pd. 20.00

Goldbeck McCafferty & McKeever  
BY: Joseph A. Goldbeck, Jr.  
Attorney I.D. #16132  
Suite 500 – The Bourse Bldg.  
111 S. Independence Mall East  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS INC.  
9441 LBJ Freeway  
Suite 350  
Dallas, TX 75243

Plaintiff

vs.

JENNIFER SUHONEY  
(Mortgagor(s) and Record Owner(s))  
Box 72  
Smokerun, PA 16681

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2004-642-CD

**AFFIDAVIT PURSUANT TO RULE 3129**

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC., Plaintiff in the above action, by its attorney, Joseph A. Goldbeck, Jr., Esquire, sets forth as of the date the praecipe for the writ of execution was filed the following information concerning the real property located at:

Box 72  
Smokerun, PA 16681

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

JENNIFER SUHONEY  
Box 86  
Smokerun, PA 16681

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

JENNIFER SUHONEY  
Box 86  
Smokerun, PA 16681

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

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement  
Health and Welfare Bldg. - Room 432  
P.O. Box 2675  
Harrisburg, PA 17105-2675

DOMESTIC RELATIONS OF CLEARFIELD COUNTY  
230 E. Market Street  
Clearfield, PA 16830

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

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

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

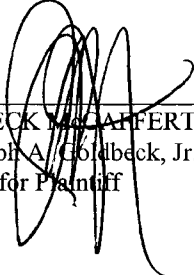
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale.

TENANTS/OCCUPANTS  
Box 72  
Smokerun, PA 16681

(attach separate sheet if more space is needed)

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

DATED: June 24, 2004



---

GOLDBECK, McCAFFERTY & McKEEVER  
BY: Joseph A. Goldbeck, Jr., Esq.  
Attorney for Plaintiff

Jospheh A. Goldbeck, Jr.  
Attorney I.D. #16132  
Suite 500 – The Bourse Bldg.  
111 S. Independence Mall East  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS INC.  
9441 LBJ Freeway  
Suite 350  
Dallas, TX 75243

Plaintiff

vs.

JENNIFER SUHONEY  
**Mortgagor(s) and Record Owner(s)**  
Box 72  
Smokerun, PA 16681

Defendant(s)

IN THE COURT OF  
COMMON PLEAS

of Clearfield County

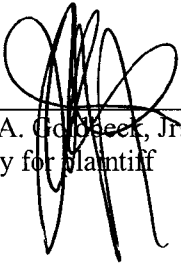
CIVIL ACTION - LAW

ACTION OF  
MORTGAGE FORECLOSURE

NO. 2004-642-CD

**CERTIFICATION AS TO THE SALE OF REAL PROPERTY**

I, Joseph A. Goldbeck, Jr., Esquire hereby certify that I am the attorney of record for the Plaintiff in this action, and I further certify that this property is subject to Act 91 of 1983 and the Plaintiff has complied with all the provisions of the Act.

  
\_\_\_\_\_  
Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff



Term  
No. 2004-642-CD

IN THE COURT OF COMMON PLEAS  
MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC.

vs.

JENNIFER SUHONEY  
Mortagor(s)  
Box 72 Smokerun, PA 16681

WRIT OF EXECUTION (Mortgage Foreclosure)	
REAL DEBT	\$49,498.91
INTEREST from	\$
COSTS PAID:	
PROTHY	\$ 125.00
SHERIFF	\$
STATUTORY	\$
COSTS DUE PROTHY	\$
Office of Judicial Support	
Judg. Fee	
Cr.	
Sat.	

Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

**Goldbeck McCafferty & McKeever**  
Suite 500 – The Bourse Bldg.  
111 S. Independence Mall East  
Philadelphia, PA 19106  
(215) 627-1322

**ALL that certain plot or piece of ground located on the West side of State Highway in the Village of Smoke Run, Bigler Township, Clearfield County, Pennsylvania, which was designated as Lots Numbered 4, 5, and 6 by a predecessor in title in the plot or plan of the Village of Beyer, and bounded and described as follows:**

**BEGINNING at the South West corner of the intersection of Centre Street and State Highway; thence North 28 ½ degrees West along Centre Street one hundred and fifty (150) feet to an alley; thence South 61 ½ degrees West along said Alley one hundred and fifty (150) feet to another Alley; thence South 28 ½ degrees East along last mentioned Alley one hundred and fifty (150) feet to State Highway; thence North 61 ½ degrees East along said State Highway one hundred and fifty (150) feet to corner at Centre Street and place of beginning. MAP #103-K15-496-00025.**

**BEING the same premises conveyed by Betty Tutokey, a widow, and Genevieve Lehmier, a widow, to Jennifer Suhoney, an individual, by deed dated November 21, 2002 and recorded November 21, 2002, in Clearfield County, at Instrument Number**

BY: Joseph A. Goldbeck, Jr.

Attorney I.D.#16132

Suite 5000 - Mellon Independence Center

701 Market Street

Philadelphia, PA 19106-1532

215-627-1322

Attorney for Plaintiff

MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS INC.

9441 LBJ Freeway

Suite 350

Dallas, TX 75243

Plaintiff

vs.

JENNIFER SUHONEY

**Mortgagor(s) and  
Record Owner(s)**

Box 72

Smokerun, PA 16681

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term

No. 2004-642-CD

FILED  
OCT 07 2004  
my 1:05 PM  
WILLIAM A. SHAW  
Prothonotary Clerk of Courts  
no c/c

EGK

**CERTIFICATE OF SERVICE**  
**PURSUANT TO Pa.R.C.P. 3129.2 (c) (2)**

Joseph A. Goldbeck, Jr., Esquire, Attorney for Plaintiff, hereby certifies that service on the Defendants of the Notice of Sheriff Sale was made by:

- ☐ Personal Service by the Sheriff's Office/competent adult (copy of return attached).
- ☒ Certified mail by Joseph A. Goldbeck, Jr. (original green Postal return receipt attached).
- ☐ Certified mail by Sheriff's Office.
- ☐ Ordinary mail by Joseph A. Goldbeck, Jr., Esquire to Attorney for Defendant(s) of record (proof of mailing attached).
- ☐ Acknowledgment of Sheriff's Sale by Attorney for Defendant(s) (proof of acknowledgment attached).
- ☐ Ordinary mail by Sheriff's Office to Attorney for Defendant(s) of record.

**IF SERVICE WAS ACCOMPLISHED BY COURT ORDER.**

- ☐ Premises was posted by Sheriff's Office/competent adult (copy of return attached).
- ☐ Certified Mail & ordinary mail by Sheriff's Office (copy of return attached).
- ☐ Certified Mail & ordinary mail by Joseph A. Goldbeck, Jr. (original receipt(s) for Certified Mail attached).

Pursuant to the Affidavit under Rule 3129 (copy attached), service on all lienholders (if any) has been made by ordinary mail by Joseph A. Goldbeck, Jr., Esquire (copies of proofs of mailing attached).

The undersigned understands that the statements herein are subject to the penalties provided by 18 P.S. Section 4904.

Respectfully submitted,

*Joseph A. Goldbeck, Jr.*  
BY: Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff



7160 3901 9848 3826 6597

**TO:** SUHONEY, JENNIFER  
**JENNIFER SUHONEY**  
Box 86  
Smokerun, PA 16681

**SENDER:** GOLDBECK MCCAFFERTY & MCKEEVER  
June 24, 2004

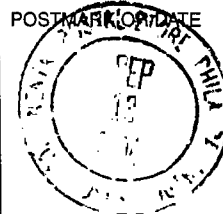
**REFERENCE:** SUHONEY, JENNIFER / O-3038  
11/5/04 - Clearfield

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

US Postal Service  
**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail



**AFFIX POSTAGE TO MAIL PIECE TO COVER FIRST CLASS  
POSTAGE, CERTIFIED FEE, RETURN RECEIPT FEE AND  
CHARGES FOR ANY SELECTED OPTIONAL SERVICES.**

1. Detach the form 3811, Domestic return receipt by tearing left to right across perf. Attach to mailpiece by peeling back the adhesive strips and affixing to front of mailpiece if space permits. Otherwise affix to back of mailpiece.
2. If you do not want the receipt postmarked, stick the article # label to the right of the return address, date receipt and retain the receipt.
3. If you want this receipt postmarked, slip the 3800 receipt between the return receipt, and the mailpiece, and slide the edge of the receipt to the gummed edge of adhesive. This will hold the receipt in place to present to your mailcenter, or post office service window. (SEE ILLUSTRATION)

(Form 3800)

TO: 981 841 789  
David D. Doe  
Legal Segment Marketing Manager  
Waltz Postal Solutions, Inc.  
1588 South Mission Rd. Suite 110  
Fallsbrook, CA 92028-4112

FROM: Your Firm Name  
123 Main Street, #1254  
City, State 12345

RETURN RECEIPT REQUESTED

David D. Doe  
Legal Segment Marketing Manager  
Waltz Postal Solutions, Inc.  
1588 South Mission Rd. Suite 110  
Fallsbrook, CA 92028-4112

4. Enter fees for the services requested in the appropriate spaces on the front of this receipt.
5. Save this receipt and present it if you make an inquiry.

7160 3901 9848 3826 6597

**TO:** SUHONEY, JENNIFER  
**JENNIFER SUHONEY**  
Box 86  
Smokerun, PA 16681

**SENDER:** GOLDBECK MCCAFFERTY & MCKEEVER  
June 24, 2004

**REFERENCE:** SUHONEY, JENNIFER / O-3038  
11/5/04 - Clearfield

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

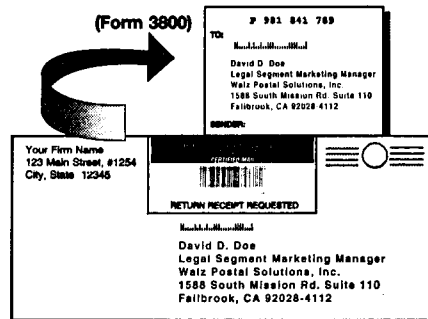
US Postal Service  
**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail



**AFFIX POSTAGE TO MAIL PIECE TO COVER FIRST CLASS POSTAGE, CERTIFIED FEE, RETURN RECEIPT FEE AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES.**

1. Detach the form 3811, Domestic return receipt by tearing left to right across perf. Attach to mailpiece by peeling back the adhesive strips and affixing to front of mailpiece if space permits. Otherwise affix to back of mailpiece.
2. If you do not want the receipt postmarked, stick the article # label to the right of the return address, date receipt and retain the receipt.
3. If you want this receipt postmarked, slip the 3800 receipt between the return receipt, and the mailpiece, and slide the edge of the receipt to the gummed edge of adhesive. This will hold the receipt in place to present to your mailcenter, or post office service window. (SEE ILLUSTRATION)



4. Enter fees for the services requested in the appropriate spaces on the front of this receipt.
5. Save this receipt and present it if you make an inquiry.

Article Number



7160 3901 9848 3826 6597

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? (Extra Fee) ☐ Yes

1. Article Addressed to:

SUHONEY, JENNIFER

**JENNIFER SUHONEY**

Box 86

Smokerun, PA 16681

GOLDBECK MCCAFFERTY & MCKEEVER  
SUHONEY, JENNIFER / O-3038 - Clearfield

PS Form 3811, July 2001

Domestic Return Receipt

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)

*Derek Freeman*

B. Date of Delivery

*9-15-04*

C. Signature

*x Derek Freeman*

☐ Agent  
☒ Addressee

D. Is delivery address different from item 1?

If YES, enter delivery address below:

☒ Yes  
☐ No

*11/5/04*

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

● PRINT YOUR NAME, ADDRESS AND ZIP CODE BELOW ●



GOLDBECK MCCAFFERTY & MCKEEVER  
STE 5000 - MELLON INDEPENDENCE CENTER  
701 MARKET STREET  
PHILADELPHIA PA 19106-1538

**GOLDBECK McCAFFERTY & McKEEVER**  
Mellon Independence Center, Suite 5000  
701 Market Street  
Philadelphia, PA 19106-1532

**Philadelphia, PA 19106-1532**

Check type of mail:

<input type="checkbox"/> Express	<input type="checkbox"/> Registered	<input type="checkbox"/> Insured	<input type="checkbox"/> COD
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If Registered Mail, Affix stamp here if issued as certificate of mailing, or for additional copies of this bill.

Date of Receipt

Postmark and Date of Receipt

Line	Article Number	Addressee Name, Street, and PO Address	Postage	Fees	Handling Charge	Actual Value (if Reg.)	Insured Value	Due Sender If COD	RR Fee	DC Fee	SC Fee	SH Fee	SD Fee	RD Fee
1		PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement Health and Welfare Bldg. - Room 432 P.O. Box 2675 Harrisburg, PA 17105-2675												
2		DOMESTIC RELATIONS OF CLEARFIELD COUNTY 230 E. Market Street Clearfield, PA 16830												
3		TENANTS/OCCUPANTS Box 72 Smokerun, PA 16681												
4														
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11														
12														
13														
14														
15														
Total Number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of receiving employ.):											

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Domestic Mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (®) parcels.

PS Form 3877, April 1999

Complete by Typewriter, Ink, or Ball Point Pen

Standard Matt (

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonpostable documents under Express Mail document reconstruction insurance is \$50,000 per item, subject to a limit of \$390,000 per declaration. The maximum indemnity payable on Express Mail merchandise Domestic Mail Manual (R00), 5913, and 5921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to Standard Mail (4) and all Point Pen (5) parcels.

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Joseph A. Goldbeck, Jr.  
Attorney I.D.#16132  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS INC.  
9441 LBJ Freeway  
Suite 350  
Dallas, TX 75243

Plaintiff

vs.

JENNIFER SUHONEY  
**Mortgagor(s) and Record Owner(s)**

Box 72  
Smokerun, PA 16681

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 2004-642-CD

**AFFIDAVIT PURSUANT TO RULE 3129**

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC., Plaintiff in the above action, by its attorney, Joseph A. Goldbeck, Jr., Esquire, sets forth as of the date the praecipe for the writ of execution was filed the following information concerning the real property located at:

Box 72  
Smokerun, PA 16681

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

JENNIFER SUHONEY  
Box 86  
Smokerun, PA 16681

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

JENNIFER SUHONEY  
Box 86  
Smokerun, PA 16681



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

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement  
Health and Welfare Bldg. - Room 432  
P.O. Box 2675  
Harrisburg, PA 17105-2675

DOMESTIC RELATIONS OF CLEARFIELD COUNTY  
230 E. Market Street  
Clearfield, PA 16830

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

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

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

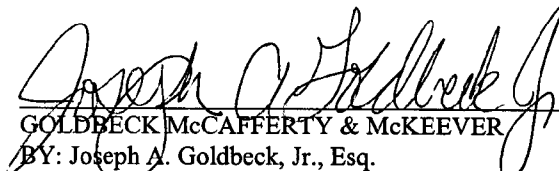
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale.

TENANTS/OCCUPANTS  
Box 72  
Smokerun, PA 16681

(attach separate sheet if more space is needed)

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

DATED: September 30, 2004

  
GOLDBECK McCafferty & McKEEVER  
BY: Joseph A. Goldbeck, Jr., Esq.  
Attorney for Plaintiff

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

DOCKET # 16201  
NO: 04-642-CD

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION  
vs.  
DEFENDANT: JENNIFER SUHONEY

WRIT OF EXECUTION REAL ESTATE

**SHERIFF RETURN**

DATE RECEIVED WRIT: 06/28/2004

LEVY TAKEN 08/31/2004 @ 9:25 AM

POSTED 08/31/2004 @ 9:25 AM

SALE HELD 06/24/2004

SOLD TO MORTGAGE ELECTRONIC REGISTRATION

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 02/11/2005

DATE DEED FILED 02/11/2005

PROPERTY ADDRESS BOX 72 CLEARFIELD , PA 16830

**SERVICES**

09/02/2004 @ 7:10 PM SERVED JENNIFER SUHONEY

SERVED JENNIFER SUHONEY, DEFENDANT, AT HER RESIDENCE BOX 86, SMOKERUN, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO JENNIFER SUHONEY

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY AND BY MAKING KNOWN TO HIM / HER THE CONTENTS THEREOF.

**FILED**

64 10:27 AM FEB 11 2005  
MCL

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 16201  
NO: 04-642-CD

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION

vs.

DEFENDANT: JENNIFER SUHONEY

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURN

---

SHERIFF HAWKINS \$253.44



SURCHARGE \$20.00 PAID BY ATTORNEY

Sworn to Before Me This

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

\_\_\_\_\_

So Answers,

Chester A. Hawkins  
Sheriff

WRIT OF EXECUTION – (MORTGAGE FORECLOSURE)  
P.R.C.P. 3180-3183 AND Rule 3257

MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS INC.  
9441 LBJ Freeway  
Suite 350  
Dallas, TX 75243

vs.

JENNIFER SUHONEY  
Box 72  
Smokerun, PA 16681

In the Court of Common Pleas of  
Clearfield County

No. 2004-642-CD

WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield

To the Sheriff of Clearfield County, Pennsylvania

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

PREMISES: Box 72 Smokerun, PA 16681

See Exhibit "A" attached

AMOUNT DUE \$49,498.91

Interest From 12/01/2003  
Through 06/24/2004

(Costs to be added)

125.00 Prothonotary  
costs 6

Dated: 6/28/04

*William L. Hays*

Prothonotary, Common Pleas Court  
of Clearfield County, Pennsylvania

Deputy \_\_\_\_\_

Received June 28, 2004 @ 3:15 P.M.  
Chester A. Hanken's  
By Cynthia Butler-Aylenbaugh

Term  
No. 2004-642-CD

IN THE COURT OF COMMON PLEAS

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC.

vs.

JENNIFER SUHONEY  
Mortgagor(s)  
Box 72 Smokerun, PA 16681

WRIT OF EXECUTION  
(Mortgage Foreclosure)

REAL DEBT	\$49,498.91
INTEREST from	\$
COSTS PAID:	\$
PROTHY	\$
SHERIFF	\$
STATUTORY	\$
COSTS DUE PROTHY	\$
Office of Judicial Support	\$
Judg. Fee	\$
Cr.	\$
Sat.	\$

Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

**Goldbeck McCafferty & McKeever**  
Suite 500 - The Bourse Bldg.  
111 S. Independence Mall East  
Philadelphia, PA 19106  
(215) 627-1322

**ALL that certain plot or piece of ground located on the West side of State Highway in the Village of Smoke Run, Bigler Township, Clearfield County, Pennsylvania, which was designated as Lots Numbered 4, 5, and 6 by a predecessor in title in the plot or plan of the Village of Beyer, and bounded and described as follows:**

**BEGINNING at the South West corner of the intersection of Centre Street and State Highway; thence North 28 ½ degrees West along Centre Street one hundred and fifty (150) feet to an alley; thence South 61 ½ degrees West along said Alley one hundred and fifty (150) feet to another Alley; thence South 28 ½ degrees East along last mentioned Alley one hundred and fifty (150) feet to State Highway; thence North 61 ½ degrees East along said State Highway one hundred and fifty (150) feet to corner at Centre Street and place of beginning. MAP #103-K15-496-00025.**

**BEING the same premises conveyed by Betty Tutokey, a widow, and Genevieve Lehmier, a widow, to Jennifer Suhoney, an individual, by deed dated November 21, 2002 and recorded November 21, 2002, in Clearfield County, at Instrument Number**

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME JENNIFER SUHONEY

NO. 04-642-CD

NOW, February 11, 2005, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on June 24, 2004, I exposed the within described real estate of Jennifer Suhoney to public venue or outcry at which time and place I sold the same to MORTGAGE ELECTRONIC REGISTRATION he/she being the highest bidder, for the sum of \$1.00 plus costs and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	15.00
SERVICE	15.00
MILEAGE	17.25
LEVY	15.00
MILEAGE	17.25
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	4.44
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	34.50
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	

**TOTAL SHERIFF COSTS                    \$254.44**

**DEED COSTS:**

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	28.50
TRANSFER TAX 2%	0.00
<b>TOTAL DEED COSTS</b>	<b>\$28.50</b>

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	49,498.91
INTEREST @ %	0.00
FROM 12/01/2003 TO 06/24/2004	

PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	20.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	

**TOTAL DEBT AND INTEREST                    \$49,518.91**

**COSTS:**

ADVERTISING	284.46
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	28.50
SHERIFF COSTS	254.44
LEGAL JOURNAL COSTS	153.00
PROTHONOTARY	125.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	

**TOTAL COSTS    \$990.40**

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

CHESTER A. HAWKINS, Sheriff