

04-658-CD
COUNTRYWIDE HOMES LOANS INC. vs. BENNY J. BAKER, et al.

Countrywide Home Loans vs Benny Baker
2004-658-CD

GOLDBECK McCAFFERTY & MCKEEVER

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

COUNTRYWIDE HOME LOANS INC.
Plaintiff

vs.

BENNY J. BAKER and LINDA L. BAKER
(Mortgagors) and (Record Owners)

P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

Defendant(s)

In the Court of Common Pleas of
Clearfield County

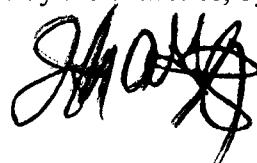
Civil Action - Law

Action of Mortgage Foreclosure

Term
No. 2004-658-CD

SUGGESTION OF DEATH

It is respectfully suggested that Defendant BENNY J. BAKER is deceased, having departed this life on May 21, 2003. Accordingly, as Defendants owned the property which is the subject of this Action of Mortgage Foreclosure as tenants by the entireties, by operation of law, title vests solely in LINDA L. BAKER.



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

FILED

JUL 21 2004

William A. Shaw
Prothonotary Clerk of Courts

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

COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX C-35
Plano, TX 75024-3632

Plaintiff
vs.

BENNY J. BAKER
LINDA L. BAKER
(Mortgagor(s) and Record owner(s))
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

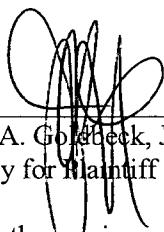
CIVIL ACTION LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2004-658-CD

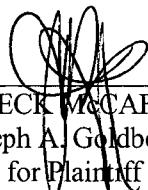
ORDER FOR JUDGMENT

Please enter Judgment in favor of COUNTRYWIDE HOME LOANS INC., and against BENNY J. BAKER and LINDA L. BAKER 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 \$59,440.43.



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 COUNTRYWIDE HOME LOANS INC. 7105 Corporate Drive PTX C-35 Plano, TX 75024-3632 and that the name(s) and last known address(es) of the Defendant(s) is/are BENNY J. BAKER, P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164 Mahaffey, PA 15757-164 and LINDA L. BAKER, P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164 Mahaffey, PA 15757-164;



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

FILED

JUL 21 2004

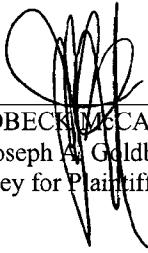
William A. Shaw
Prothonotary, Clerk of Courts

ASSESSMENT OF DAMAGES

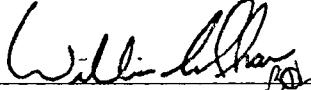
TO THE PROTHONOTARY:

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

| | |
|---|----------------------|
| Principal Balance | \$51,937.46 |
| Interest from 09/01/2003 through 06/30/2004 | \$3,675.35 |
| Attorney's Fee at 5.0000% of principal balance | \$2,596.87 |
| Late Charges | \$199.44 |
| Costs of Suit and Title Search | \$900.00 |
| Escrow Balance Deficit | \$131.31 (\$0.00) |
| | <hr/> \$59,440.43 |


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

AND NOW, this 21st day of July, 2004 damages are assessed as above.



Pro Prothy

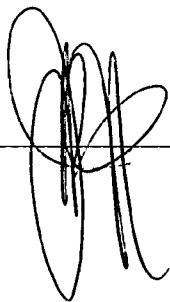
VERIFICATION OF NON-MILITARY SERVICE

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, LINDA L. BAKER, is about unknown years of age, that Defendant's last known residence is P.O. Box 103 Locust Street/a/k/a 43 Locust Street a/k/a P.O. Box 164, Mahaffey, PA 15757-164, 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, appearing to read "Linda L. Baker", is written over a horizontal line. The signature is fluid and cursive, with a large, stylized 'L' at the beginning.

In the Court of Common Pleas of Clearfield County

COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX C-35
Plano, TX 75024-3632

Plaintiff

VS.

BENNY J. BAKER
LINDA L. BAKER
(Mortgagor(s) and Record Owner(s))
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

No. 2004-658-CD

Defendant(s)

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 BENNY J. BAKER and LINDA L. BAKER by default for want of an Answer.

Assess damages as follows:

\$59,440.43

Debt

Interest - 09/01/2003 to 06/30/2004

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 July 21, 2004, judgment is entered in favor of COUNTRYWIDE HOME LOANS INC. and against BENNY J. BAKER and LINDA L. BAKER by default for want of an Answer and damages assessed in the sum of \$59,440.43 as per the above certification. *m*

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 17, 2004**

TO:

BENNY J. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX C-35
Plano, TX 75024-3632

Plaintiff

vs.
BENNY J. BAKER
LINDA L. BAKER
(Mortgagor(s) and Record Owner(s))
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

In the Court of
Common Pleas
of Clearfield County

CIVIL ACTION - LAW

Action of
Mortgage Foreclosure

Term
No. 2004-658-CD

Defendant(s)

TO: **BENNY J. BAKER**
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

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 17, 2004**

TO:

LINDA L. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX C-35
Plano, TX 75024-3632

Plaintiff

vs.
BENNY J. BAKER
LINDA L. BAKER
(Mortgagor(s) and Record Owner(s))
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

In the Court of
Common Pleas
of Clearfield County

CIVIL ACTION - LAW

Action of
Mortgage Foreclosure

Term
No. 2004-658-CD

Defendant(s)

TO: **LINDA L. BAKER**
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

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
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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

NOTICE OF JUDGMENT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,
PENNSYLVANIA

CIVIL DIVISION

Countrywide Home Loans Inc.

Vs.

No. 2004-00658-CD

Benny J. Baker
Linda L. Baker

To: DEFENDANT(S)

NOTICE is given that a JUDGMENT in the above captioned matter has been entered
against you in the amount of \$59,440.43 on July 21, 2004.

William A. Shaw
Prothonotary

William A. Shaw

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

Countrywide Home Loans Inc.
Plaintiff(s)

No.: 2004-00658-CD

Real Debt: \$59,440.43

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Benny J. Baker
Linda L. Baker
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: July 21, 2004

Expires: July 21, 2009

Certified from the record this 21st day of July, 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

PRAEICE 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

COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX C-35
Plano, TX 75024-3632

Plaintiff
vs.

BENNY J. BAKER
LINDA L. BAKER
Mortgagor(s) and Record Owner(s)
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION – LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2004-658-CD

PRAEICE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Issue Writ of Execution in the above matter:

Amount Due

\$59,440.43

Interest from
09/01/2003 to
06/30/2004 at
8.5000%

(Costs to be added)

125.00 Prothonotary costs

~~GOLDBECK MCAFERTY & MCKEEVER~~
BY: Joseph A. Goldebeck, Jr.
Attorney for Plaintiff

FILED

JUL 21 2004

W. S. & S. S. & S.
Prothoracal, - era of Courts

Term
No. 2004-658-CD
IN THE COURT OF COMMON PLEAS
COUNTRYWIDE HOME LOANS INC.

vs.

BENNY J. BAKER and
LINDA L. BAKER
(Mortgagor(s) and Record Owner(s))
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

RECEIVED
IN THE COURT OF COMMON PLEAS
COUNTRYWIDE HOME LOANS INC.
BENNY J. BAKER and
LINDA L. BAKER
Mortgagors
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757
RECEIVED
IN THE COURT OF COMMON PLEAS
COUNTRYWIDE HOME LOANS INC.
BENNY J. BAKER and
LINDA L. BAKER
Mortgagors
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

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

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

COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX C-35
Plano, TX 75024-3632

In the Court of Common Pleas of
Clearfield County

vs.

BENNY J. BAKER
LINDA L. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

No. 2004-658-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: P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164 Mahaffey, PA 15757

See Exhibit "A" attached

| AMOUNT DUE | <u>\$59,440.43</u> |
|------------|--------------------|
|------------|--------------------|

Interest From 09/01/2003
Through 06/30/2004

(Costs to be added)

Prothonotary costs 125.00

Willie L. Haze

Prothonotary, Common Pleas Court
of Clearfield County, Pennsylvania

Dated: 7/2/04

Deputy _____

Term
No. 2004-658-CD

IN THE COURT OF COMMON PLEAS
COUNTRYWIDE HOME LOANS INC.

vs.

BENNY J. BAKER and
LINDA L. BAKER
Mortagor(s)

P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

WRIT OF EXECUTION
(Mortgage Foreclosure)

| | |
|----------------------------|-------------|
| REAL DEBT | \$59,440.43 |
| 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

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

COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX C-35
Plano, TX 75024-3632

Plaintiff

vs.

BENNY J. BAKER
LINDA L. BAKER
(Mortgagor(s) and Record Owner(s))
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2004-658-CD

AFFIDAVIT PURSUANT TO RULE 3129

COUNTRYWIDE HOME LOANS 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:

P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

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

BENNY J. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

LINDA L. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

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

LINDA L. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

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:

SECRETARY OF HOUSING AND URBAN DEVELOPMENT
451 Seventh Street SW
Washington, DC 20410

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.

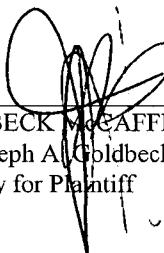
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale.

TENANTS/OCCUPANTS
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

(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 30, 2004


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

Legal Description: (As shown on Mortgage)

ALL THAT CERTAIN PIECE, PARCEL AND LOT OF LAND SITUATE, LYING AND BEING IN THE BOROUGH OF MAHAFFEY, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO-WIT:

BOUNDED ON THE NORTH BY LOCUST STREET;
BOUNDED ON THE SOUTH BY AN ALLEY AND A P. & N. W. RAILROAD RIGHT OF WAY;
BOUNDED ON THE EAST BY AN ALLEY; AND
BOUNDED ON THE WEST BY P. & N. W. RAILROAD RIGHT OF WAY.

BEING A PARCEL OF LAND TRIANGULAR IN SHAPE AND KNOWN AS LOTS NOS. 28 AND 29 IN THE PLAN OF LOTS FOR THE WESTERN PART OF THE BOROUGH OF MAHAFFEY.

BEING DESIGNATED AS TAX IDENTIFICATION NUMBER C11-303-00033.

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

COUNTRYWIDE HOME LOANS INC.

7105 Corporate Drive

PTX C-35

Plano, TX 75024-3632

Plaintiff

vs.

BENNY J. BAKER

LINDA L. BAKER

Mortgagor(s) and Real Owner(s)

P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a
P.O. Box 164, Mahaffey, PA 15757

Defendant(s)

IN THE COURT OF COMMON PLEAS

OF CLEARFIELD COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term

No. 2004-658-C0

**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

A V I S O

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 RESPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIR 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 ENSEGUITA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEER CON INFORMACION DE COMO CONSEGUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ESTA OFICINA PUEDE PROVEER INFORMACION ACERCA A AGENCIAS QUE PUEDEN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLES A UN HONORARIO REDUCIDO O GRATIS.

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

FILED

MAY 12 2004

11-30145

William A. Shaw
Prothonotary
2 CEN TO SHFC

1 CEN TO ATTY

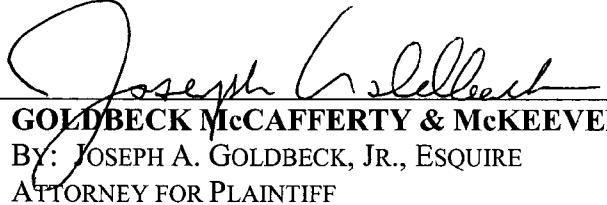
COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff is COUNTRYWIDE HOME LOANS INC., 7105 Corporate Drive, PTX C-35 Plano, TX 75024-3632.
2. The name(s) and address(es) of the Defendant(s) is/are BENNY J. BAKER, P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164, Mahaffey, PA 15757 and LINDA L. BAKER, P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164, Mahaffey, PA 15757, who is/are the mortgagor(s) and real owner(s) of the mortgaged premises hereinafter described.
3. On October 24, 1997 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to TOWNE & COUNTRY MORTGAGE CORP., which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Book: 1883 Page: 222. The mortgage has not been assigned unless said assignment to the Plaintiff is hereafter mentioned. The aforementioned mortgage was assigned to: COUNTRYWIDE HOME LOANS INC. by Assignment of Mortgage which Assignment is lodged for recording; and these documents are matters of public record and are incorporated herein by reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g).
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payment of principal and interest upon said mortgage due October 01, 2003, 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.
6. The following amounts are due on the mortgage:

| | |
|---|-------------------|
| Principal Balance | \$51,937.46 |
| Interest from 09/01/2003 | \$3,312.65 |
| through 05/31/2004 at 8.5000% | |
| Per Diem interest rate at \$12.09 | |
| Attorney's Fee at 5.0% of Principal Balance | \$2,596.87 |
| Late Charges from 10/01/2003 to 05/31/2004 | \$177.28 |
| Monthly late charge amount at \$22.16 | |
| Costs of suit and Title Search | <hr/> \$900.00 |
| Monthly Escrow amount \$131.31 | <hr/> \$58,924.26 |
| | <hr/> \$58,924.26 |

7. 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.
8. The within mortgage is insured by the Federal Housing Administration under Title II of the National Housing Act and, as such, is not subject to the provisions of Pennsylvania Act No. 91 of 1983.

WHEREFORE, Plaintiff demands an in rem judgment in mortgage foreclosure in the sum of \$58,924.26, together with interest at the rate of \$12.09, 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, Michael D. Vestal, 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: 5-10-07

Michael D. Vestal
Michael D. Vestal
COUNTRYWIDE HOME LOANS INC.

Legal Description: (As shown on Mortgage)

ALL THAT CERTAIN PIECE, PARCEL AND LOT OF LAND SITUATE, LYING AND BEING IN THE BOROUGH OF MAHAFFEY, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO-WIT:

BOUNDED ON THE NORTH BY LOCUST STREET;
BOUNDED ON THE SOUTH BY AN ALLEY AND A P. & N. W. RAILROAD RIGHT OF WAY;
BOUNDED ON THE EAST BY AN ALLEY; AND
BOUNDED ON THE WEST BY P. & N. W. RAILROAD RIGHT OF WAY.

BEING A PARCEL OF LAND TRIANGULAR IN SHAPE AND KNOWN AS LOTS NOS. 28 AND 29 IN THE PLAN OF LOTS FOR THE WESTERN PART OF THE BOROUGH OF MAHAFFEY.

BEING DESIGNATED AS TAX IDENTIFICATION NUMBER C11-303-00033.

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

COUNTRYWIDE HOME LOANS INC.

7105 Corporate Drive

PTX C-35

Plano, TX 75024-3632

Plaintiff

vs.

BENNY J. BAKER

LINDA L. BAKER

Mortgagor(s) and

Record Owner(s)

P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term

No. 2004-658-CD

E&K
 FILED NO
 11/13/2004
 NOV 04 2004

William A. Shaw
 Prothonotary/Clerk of Courts

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:

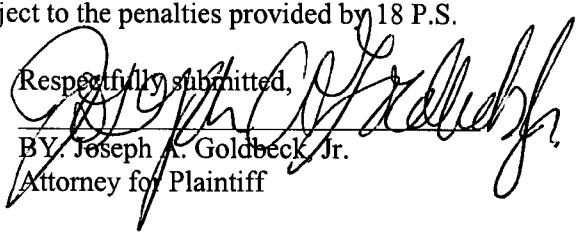
- Personal Service by the Sheriff's Office/competent adult (copy of return attached).
- Certified mail by Joseph A. Goldbeck, Jr. (original green Postal return receipt attached).
- Certified mail by Sheriff's Office.
- Ordinary mail by Joseph A. Goldbeck, Jr., Esquire to Attorney for Defendant(s) of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

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

Name and Address of Sender
GOLDBECK
SUITE 5000
701 MARKET STREET
PHILADELPHIA, PA
19106-1532

| | | Check type of mail or service. | | Affix Stamp Here (If issued as a certificate of mailing, or for additional copies of this bill) | | | | | | | | | | | |
|--|----------------|---|--|---|---|-----------------|----------------------------|---------------|-------------------|--------|--------|--------|--------|--------|--|
| | | <input type="checkbox"/> Certified | <input type="checkbox"/> Recorded Delivery (International) | <input type="checkbox"/> Registered | <input type="checkbox"/> Return Receipt for Merchandise | | | | | | | | | | |
| | | <input type="checkbox"/> COD | <input type="checkbox"/> Delivery Confirmation | <input type="checkbox"/> Express Mail | <input type="checkbox"/> Signature Confirmation | | | | | | | | | | |
| | | | | Insured | | | | | | | | | | | |
| 1. | Article Number | Addressee (Name, Street, City, State, & ZIP Code) | | Postage | Fee | Handling Charge | Actual Value if Registered | Insured Value | Due Sender if COD | DC Fee | SC Fee | SH Fee | RD Fee | RR Fee | |
| 2. | | PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement Health and Welfare Bldg. - Room 432 P.O. Box 2675 Harrisburg, PA 17105-2675 | | | | | | | | | | | | | |
| 3. | | DOMESTIC RELATIONS OF CLEARFIELD COUNTY 230 E. Market Street Clearfield, PA 16830 | | | | | | | | | | | | | |
| 4. | | SECRETARY OF HOUSING AND URBAN DEVELOPMENT 451-Seven Street SW Washington, DC 20410 | | | | | | | | | | | | | |
| 5. | | COMMONWEALTH OF PA DEPT OF REVENUE INHERITANCE TAX DIVISION 1131 Strawberry Square 6th Floor Harrisburg, PA 17128 | | | | | | | | | | | | | |
| 6. | | INTERNAL REVENUE SERVICE - SPECIAL PROCEDURES BRANCH 1001 Liberty Avenue Thirteenth Floor, Suite 1300 Pittsburgh, PA 15222 | | | | | | | | | | | | | |
| 7. | | DEPARTMENT OF PUBLIC WELFARE Estate Recovery Program PO Box 8486, Willow Oak Building Harrisburg, PA 17105-8486 | | | | | | | | | | | | | |
| 8. | | TENANTS/OCCUPANTS P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164 Mahanay, PA 15757 Postmaster, Per (Name of receiving employee) | | | | | | | | | | | | | |
| Total Number of Pieces Used by Sender | | Total Number of Pieces Received at Post Office | | See Privacy Act Statement on Reverse | | | | | | | | | | | |

Clearfield

7160-3901 9848 3827 7777

TO: Linda L. Baker
4655 Lochvale Road
Rossiter, PA 15772

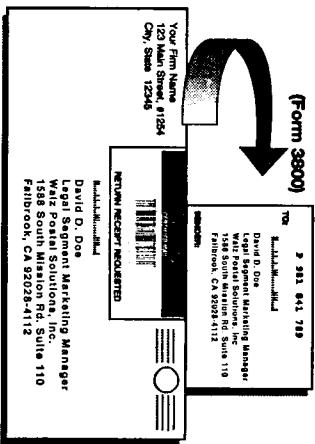
SENDER: GOLDBECK MCCAFFERTY & MCKEEVER
October 21, 2004

REFERENCE: BAKER, BENNY J / CWD-3524
12/03/04 - 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 | |
| POSTMARK OR DATE | |
| <i>10/21/04</i> | |
| 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.

7160 3901 9848 3826 5682

TO: BAKER, LINDA
LINDA L. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

SENDER: GOLDBECK MCCAFFERTY & MCKEEVER
June 30, 2004

REFERENCE: BAKER, BENNY J. / CWD-3524
12/3/04
- Clearfield

| PS Form 3800, June 2000 | |
|------------------------------|--------------------------|
| RETURN RECEIPT SERVICE | Postage Certified Fee |
| | Return Receipt Fee |
| | Restricted Delivery |
| | Total Postage & Fees |

STATE
PHILADELPHIA
PA
CITY
17/2

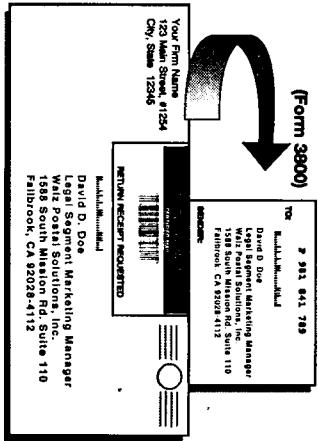
POSTMARK OR DATE
CITY
17/2

**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.

2. Article Number



7160 3901 9848 3827 7777

3. Service Type CERTIFIED MAIL

4. Restricted Delivery? (Extra Fee) Yes

1. Article Addressed to:

Linda L Baker

4655 Lochvale Road
Rossiter, PA 15772

GOLDBECK MCCAFFERTY & MCKEEVER
BAKER, BENNY J. / CWD-3524 12/03/04 - Clearfield

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Linda L. Baker

B. Date of Delivery

10-23-04

C. Signature

X

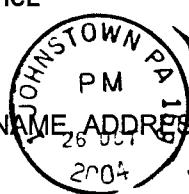
Linda L. Baker

Agent
 Addressee

D. Is delivery address different from item 1?
If YES, enter delivery address below:

Yes
 No

UNITED STATES POSTAL SERVICE



● PRINT YOUR NAME, ADDRESS AND ZIP CODE BELOW ●

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

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

2. Article Number



7160 3901 9848 3826 5662

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? (Extra Fee) Yes

1. Article Addressed to:

BAKER, LINDA

LINDA L. BAKER

P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

GOLDBECK MCCAFFERTY & MCKEEVER
BAKER, BENNY J. / CWD-3524 - Clearfield

PS Form 3811, July 2001

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly)

Linda L. Baker 10-29-04

B. Date of Delivery

C. Signature

X Linda L. Baker

Agent
 Addressee

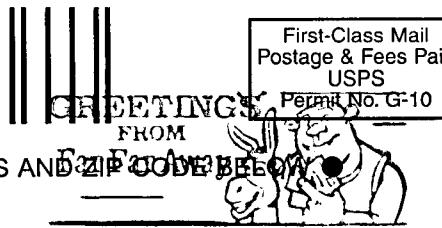
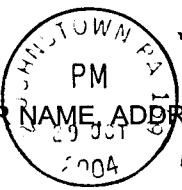
D. Is delivery address different from item 1?
If YES, enter delivery address below:

Yes
 No

4655 LOCKVALE RD

UNITED STATES POSTAL SERVICE

● PRINT YOUR NAME, ADDRESS AND ZIP CODE BELOW



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

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

COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX C-35
Plano, TX 75024-3632

Plaintiff

vs.

BENNY J. BAKER
LINDA L. BAKER
Mortgagor(s) and Record Owner(s)

P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term
No. 2004-658-CD

AFFIDAVIT PURSUANT TO RULE 3129

COUNTRYWIDE HOME LOANS 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:

P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

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

BENNY J. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

LINDA L. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

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

BENNY J. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

LINDA L. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757-164

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:

SECRETARY OF HOUSING AND URBAN DEVELOPMENT
451 Seventh Street SW
Washington, DC 20410

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.

COMMONWEALTH OF PA DEPT OF REVENUE INHERITANCE TAX DIVISION
1131 Strawberry Square
6th Floor
Harrisburg, PA 17128

INTERNAL REVENUE SERVICE - SPECIAL PROCEDURES BRANCH
1001 Liberty Avenue
Thirteenth Floor, Suite 1300
Pittsburgh, PA 15222

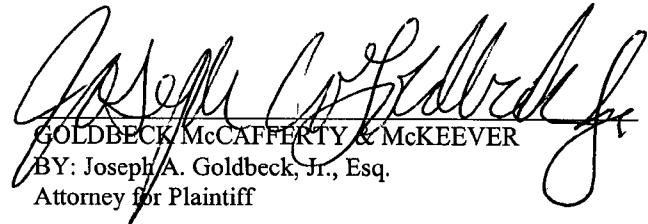
DEPARTMENT OF PUBLIC WELFARE
Estate Recovery Program
PO Box 8486, Willow Oak Building
Harrisburg, PA 17105-8486

TENANTS/OCCUPANTS
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

(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: October 29, 2004



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

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME BENNY J. BAKER

NO. 04-658-CD

NOW, February 17, 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 December 03, 2004, I exposed the within described real estate of Benny J. Baker And Linda L. Baker to public venue or outcry at which time and place I sold the same to COUNTRYWIDE HOME LOANS INC. 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 | 16.50 |
| LEVY | 15.00 |
| MILEAGE | 16.50 |
| POSTING | 15.00 |
| CSDS | 10.00 |
| COMMISSION | 0.00 |
| POSTAGE | 9.69 |
| HANDBILLS | 15.00 |
| DISTRIBUTION | 25.00 |
| ADVERTISING | 15.00 |
| ADD'L SERVICE | 15.00 |
| DEED | 30.00 |
| ADD'L POSTING | |
| ADD'L MILEAGE | |
| ADD'L LEVY | |
| BID AMOUNT | 1.00 |
| RETURNS/DEPUTIZE | |
| COPIES | 15.00 |
| | 5.00 |
| BILLING/PHONE/FAX | 10.00 |
| CONTINUED SALES | |
| MISCELLANEOUS | |

TOTAL SHERIFF COSTS

\$243.69

DEED COSTS:

| | |
|-------------------------|----------------|
| ACKNOWLEDGEMENT | 5.00 |
| REGISTER & RECORDER | 28.50 |
| TRANSFER TAX 2% | 0.00 |
| TOTAL DEED COSTS | \$28.50 |

PLAINTIFF COSTS, DEBT AND INTEREST:

| | |
|-------------------------------|-----------|
| DEBT-AMOUNT DUE | 59,440.43 |
| INTEREST @ 13.8400 % | 6,352.56 |
| FROM 09/01/2003 TO 12/03/2004 | |

| | |
|--------------------------|-------|
| PROTH SATISFACTION | |
| LATE CHARGES AND FEES | |
| COST OF SUIT-TO BE ADDED | |
| FORECLOSURE FEES | |
| ATTORNEY COMMISSION | |
| REFUND OF ADVANCE | |
| REFUND OF SURCHARGE | 40.00 |
| SATISFACTION FEE | |
| ESCROW DEFICIENCY | |
| PROPERTY INSPECTIONS | |
| INTEREST | |
| MISCELLANEOUS | |

| | |
|--------------------------------|--------------------|
| TOTAL DEBT AND INTEREST | \$65,832.99 |
|--------------------------------|--------------------|

COSTS:

| | |
|---------------------|--------|
| ADVERTISING | 288.42 |
| TAXES - COLLECTOR | |
| TAXES - TAX CLAIM | |
| DUE | |
| LIEN SEARCH | 100.00 |
| ACKNOWLEDGEMENT | 5.00 |
| DEED COSTS | 28.50 |
| SHERIFF COSTS | 243.69 |
| LEGAL JOURNAL COSTS | 135.00 |
| PROTHONOTARY | 125.00 |
| MORTGAGE SEARCH | 40.00 |
| MUNICIPAL LIEN | |

| | |
|--------------------|-----------------|
| TOTAL COSTS | \$965.61 |
|--------------------|-----------------|

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 16393
NO: 04-658-CD

PLAINTIFF: COUNTRYWIDE HOME LOANS INC.
vs.
DEFENDANT: BENNY J. BAKER AND LINDA L. BAKER

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 07/21/2004

LEVY TAKEN 10/18/2004 @ 9:40 AM
POSTED 10/18/2004 @ 9:40 AM
SALE HELD 12/03/2004
SOLD TO COUNTRYWIDE HOME LOANS INC.
SOLD FOR AMOUNT \$1.00 PLUS COSTS
WRIT RETURNED 02/17/2005
DATE DEED FILED 02/01/2005

PROPERTY ADDRESS P. O. BOX 103 LOCUST ST A/K/A 43 LOCUST ST A/K/A P. O. BOX 164 MAHAFFEY , PA 15757

6K 01/0081
FILED
FEB 17 2005

William A. Shaw
Prothonotary/Clerk of Courts

SERVICES

@ SERVED BENNY J. BAKER
DECEASED

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.

11/10/2004 @ SERVED LINDA L. BAKER

SERVED LINDA L. BAKER AT 4655 LOCHVALE ROAD, ROSSITER, PENNSYLVANIA BY REGULAR AND CERT. MAIL SIGNED FOR BY JOHN BAKER ON 11/10/2004. CERT #70023150000078546365

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 16393
NO: 04-658-CD

PLAINTIFF: COUNTRYWIDE HOME LOANS INC.

vs.

DEFENDANT: BENNY J. BAKER AND LINDA L. BAKER

WRIT OF EXECUTION REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS

243.69
\$242.69

SURCHARGE

\$40.00 PAID BY ATTORNEY

Sworn to Before Me This

____ Day of _____ 2005

So Answers,

Chester Hawkins
by Captain Bette Aufderhaar
Chester A. Hawkins
Sheriff

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

COUNTRYWIDE HOME LOANS INC.
7105 Corporate Drive
PTX C-35
Plano, TX 75024-3632

In the Court of Common Pleas of
Clearfield County

vs.

BENNY J. BAKER
LINDA L. BAKER
P.O. Box 103 Locust Street
a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

No. 2004-658-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: P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164 Mahaffey, PA 15757

See Exhibit "A" attached

| AMOUNT DUE | \$59,440.43 |
|------------|-------------|
|------------|-------------|

Interest From 09/01/2003
Through 06/30/2004

(Costs to be added)

Prothonotary costs 125.00

Will Shantz

Prothonotary, Common Pleas Court
of Clearfield County, Pennsylvania

Deputy _____

Received July 21, 2004 @ 3:45 p.m.
Chester G. Hawkins
by Cynthia Butter-Aughenbaugh

Term
No. 2004-658-CD

IN THE COURT OF COMMON PLEAS
COUNTRYWIDE HOME LOANS INC.

vs.

BENNY J. BAKER and
LINDA L. BAKER

Mortagor(s)

P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164
Mahaffey, PA 15757

WRIT OF EXECUTION
(Mortgage Foreclosure)

| | |
|----------------------------|--------------------|
| REAL DEBT | <u>\$59,440.43</u> |
| INTEREST from | <u>\$</u> |
| COSTS PAID: | <u>125.00</u> |
| PROTHY | <u>\$</u> |
| SHERIFF | <u>\$</u> |
| STATUTORY | <u>\$</u> |
| COSTS DUE PROTHY | <u>\$</u> |
| Office of Judicial Support | <u>\$</u> |
| Judg. Fee | <u>\$</u> |
| Cr. | <u>\$</u> |
| Sat. | <u>\$</u> |

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

Legal Description: (As shown on Mortgage)

ALL THAT CERTAIN PIECE, PARCEL AND LOT OF LAND SITUATE, LYING AND BEING IN THE BOROUGH OF MAHAFFEY, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO-WIT:

BOUNDED ON THE NORTH BY LOCUST STREET;
BOUNDED ON THE SOUTH BY AN ALLEY AND A P. & N. W. RAILROAD RIGHT OF WAY;
BOUNDED ON THE EAST BY AN ALLEY; AND
BOUNDED ON THE WEST BY P. & N. W. RAILROAD RIGHT OF WAY.

BEING A PARCEL OF LAND TRIANGULAR IN SHAPE AND KNOWN AS LOTS NOS. 28 AND 29 IN THE PLAN OF LOTS FOR THE WESTERN PART OF THE BOROUGH OF MAHAFFEY.

BEING DESIGNATED AS TAX IDENTIFICATION NUMBER C11-303-00033.

In The Court of Common Pleas of Clearfield County, Pennsylvania

COUNTRYWIDE HOME LOANS INC

VS.

BAKER, BEENNY J. & LINDA L.

Sheriff Docket # 15568

04-658-CD

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW MAY 27, 2004 AT 10:08 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON LINDA L. BAKER, DEFENDANT AT RESIDENCE, P OBOX 103 LOCUST ST., a/k/a 43 LOCUST ST., a/k/a PO BOX 164 MAHAFFEY, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JOHN BAKER, SON A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: DAVIS/MORGILLO

NOW JUNE 2, 2004 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO BENNY J. BAKER, DEFENDANT IS "DECEASED".

Return Costs

| Cost | Description |
|--------------|--|
| 56.37 | SHERIFF HAWKINS PAID BY: ATT CK# 200048 |
| 20.00 | SURCHARGE PAID BY: ATTY CK# 200049 |

Sworn to Before Me This

3rd Day Of June 2004

Chester A. Hawkins

So Answers,

Chester A. Hawkins
My Deputy, Hano

Chester A. Hawkins

Sheriff

FILED

JUN 9 2004

010548 a-21

**William A. Shaw
Prothonotary**

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

I HEREBY CERTIFY THAT THIS IS
A TRUE AND CORRECT COPY OF
THE ORIGINAL FILED

COUNTRYWIDE HOME LOANS INC.

7105 Corporate Drive

PTX C-35

Plano, TX 75024-3632

Plaintiff

vs.

BENNY J. BAKER

LINDA L. BAKER

Mortgagor(s) and Real Owner(s)

P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a
P.O. Box 164, Mahaffey, PA 15757

Defendant(s)

IN THE COURT OF COMMON PLEAS

OF CLEARFIELD COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term

No. 2004-658-10

**SUITE 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

A V I S O

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 RESPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIR 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 TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEER CON INFORMACION DE COMO CONSEGUIR UN ABOGADO.

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

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800-692-7375

KEYSTONE LEGAL SERVICES
211 1/2 E. Locust Street
Clearfield, PA 16830
814-765-9646

I hereby certify this to be a true
and correct copy of the original
statement of facts.

MAY 1, 2004

Attest.

*John J. Goldbeck
Plaintiff's Attorney
Goldbeck McCafferty & McKeever, LLP*

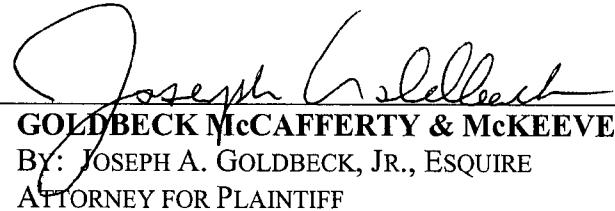
COMPLAINT IN MORTGAGE FORECLOSURE THAT THIS IS
A TRUE AND CORRECT COPY OF
THE ORIGINAL FILED

1. Plaintiff is COUNTRYWIDE HOME LOANS INC., 7105 Corporate Drive, PTX C-35 Plano, TX 75024-3632.
2. The name(s) and address(es) of the Defendant(s) is/are BENNY J. BAKER, P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164, Mahaffey, PA 15757 and LINDA L. BAKER, P.O. Box 103 Locust Street a/k/a 43 Locust Street a/k/a P.O. Box 164, Mahaffey, PA 15757, who is/are the mortgagor(s) and real owner(s) of the mortgaged premises hereinafter described.
3. On October 24, 1997 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to TOWNE & COUNTRY MORTGAGE CORP., which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Book: 1883 Page: 222. The mortgage has not been assigned unless said assignment to the Plaintiff is hereafter mentioned. The aforementioned mortgage was assigned to: COUNTRYWIDE HOME LOANS INC. by Assignment of Mortgage which Assignment is lodged for recording; and these documents are matters of public record and are incorporated herein by reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g).
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payment of principal and interest upon said mortgage due October 01, 2003, 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.
6. The following amounts are due on the mortgage:

| | |
|---|-------------------|
| Principal Balance | \$51,937.46 |
| Interest from 09/01/2003 | \$3,312.65 |
| through 05/31/2004 at 8.5000% | |
| Per Diem interest rate at \$12.09 | |
| Attorney's Fee at 5.0% of Principal Balance | \$2,596.87 |
| Late Charges from 10/01/2003 to 05/31/2004 | \$177.28 |
| Monthly late charge amount at \$22.16 | |
| Costs of suit and Title Search | <hr/> \$900.00 |
| Monthly Escrow amount \$131.31 | <hr/> \$58,924.26 |
| | <hr/> \$58,924.26 |

7. 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.
8. The within mortgage is insured by the Federal Housing Administration under Title II of the National Housing Act and, as such, is not subject to the provisions of Pennsylvania Act No. 91 of 1983.

WHEREFORE, Plaintiff demands an in rem judgment in mortgage foreclosure in the sum of \$58,924.26, together with interest at the rate of \$12.09, 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, Michael D. Vestal, 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: 5-10-07

Michael D. Vestal
Michael D. Vestal
COUNTRYWIDE HOME LOANS INC.

Legal Description: (As shown on Mortgage)

ALL THAT CERTAIN PIECE, PARCEL AND LOT OF LAND SITUATE, LYING AND BEING IN THE BOROUGH OF MAHAFFEY, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO-WIT:

BOUNDED ON THE NORTH BY LOCUST STREET;
BOUNDED ON THE SOUTH BY AN ALLEY AND A P. & N. W. RAILROAD RIGHT OF WAY;
BOUNDED ON THE EAST BY AN ALLEY; AND
BOUNDED ON THE WEST BY P. & N. W. RAILROAD RIGHT OF WAY.

BEING A PARCEL OF LAND TRIANGULAR IN SHAPE AND KNOWN AS LOTS NOS. 28 AND 29 IN THE PLAN OF LOTS FOR THE WESTERN PART OF THE BOROUGH OF MAHAFFEY.

BEING DESIGNATED AS TAX IDENTIFICATION NUMBER C11-303-00033.