

04-683-CD  
CITIFINANCIAL SERVICES, INC. vs. CHRISTINE E. WHITMORE

Citifinancial Services vs Christine Whitmore  
2004-683-CD

7160 3401 9848 6482 9247

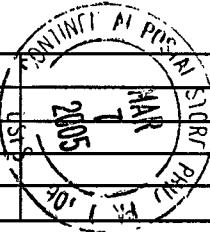
**TO:** WHITMORE, RICKY L.  
**RICKY L. WHITMORE**  
116 Evergreen Street  
Dubois, PA 15801

**SENDER:** GOLDBECK MCCAFFERTY & MCKEEVER  
December 15, 2004

**REFERENCE:** WHITMORE, CHRISTINE E. / CIMD-0299  
5/6/05  
- Clearfield

PS Form 3800, June 2000

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



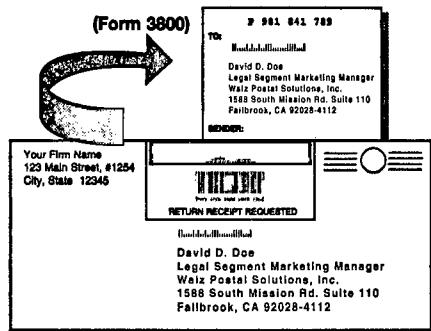
US Postal Service      POSTMARK OR DATE

**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.

7160 3901 9848 6482 9230

**TO:** WHITMORE, CHRISTINE E.  
**CHRISTINE E. WHITMORE**  
116 Evergreen Street  
Dubois, PA 15801

**SENDER:** GOLDBECK MCCAFFERTY & MCKEEVER  
December 15, 2004

**REFERENCE:** WHITMORE, CHRISTINE E. / CIMD-0299  
5/12/05 - 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**

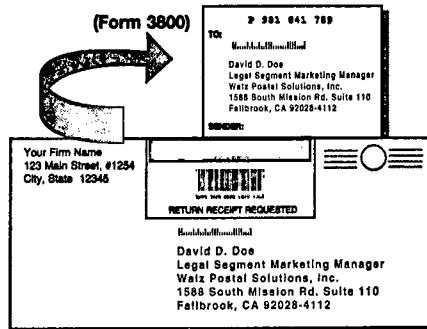
No Insurance Coverage Provided  
Do Not Use for International Mail

POSTMARK OR DATE

PA 15801  
12/15/04

**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.
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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 6482 9230

3. Service Type **CERTIFIED MAIL**4. Restricted Delivery? (Extra Fee)  Yes

## 1. Article Addressed to:

WHITMORE, CHRISTINE E.  
**CHRISTINE E. WHITMORE**

116 Evergreen Street  
 Dubois, PA 15801

GOLDBECK MCCAFFERTY & MCKEEVER  
 WHITMORE, CHRISTINE E. / C1MD-0299 - Clearfield

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly)	B. Date of Delivery
Christine Whitmore	3/30/05
C. Signature	
<i>Christine Whitmore</i>	
D. Is delivery address different from item 1? If YES, enter delivery address below:	
<input type="checkbox"/> Agent <input type="checkbox"/> Addressee <input type="checkbox"/> Yes <input type="checkbox"/> No	

5/10/05

UNITED STATES POSTAL SERVICE



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

• PRINT YOUR NAME, ADDRESS AND ZIP CODE BELOW •

1. ....  
**GOLDBECK MCCAFFERTY & MCKEEVER**  
**STE 5000 - MELLON INDEPENDENCE CENTER**  
**701 MARKET STREET**  
**PHILADELPHIA PA 19106-1538**

2. Article Number



7160 3901 9848 6482 9247

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? (Extra Fee)  Yes

1. Article Addressed to:

WHITMORE, RICKY L.

**RICKY L. WHITMORE**

116 Evergreen Street  
Dubois, PA 15801

GOLDBECK MCCAFFERTY & MCKEEVER  
WHITMORE, CHRISTINE E. / CIMD-0299

- Clearfield

5/6/05

PS Form 3811, July 2001

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY	
A. Received by (Please Print Clearly)	B. Date of Delivery
<i>Ricky Whitmore</i> 5/6/05	
C. Signature	
<input checked="" type="checkbox"/> <i>Ricky Whitmore</i>	
D. Is delivery address different from item 1? If YES, enter delivery address below:	
<input type="checkbox"/> Yes	
<input type="checkbox"/> No	

## 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**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20074  
NO: 04-683-CD

PLAINTIFF: CITIFINANCIAL SERVICES INC.

VS.

DEFENDANT: CHRISTINE E. WHITMORE AND RICKY L. WHITMORE

Execution REAL ESTATE

**SHERIFF RETURN**

DATE RECEIVED WRIT: 12/21/2004

LEVY TAKEN 03/02/2005 @ 2:45 PM

POSTED 03/02/2005 @ 2:43 PM

SALE HELD 05/06/2005

SOLD TO CITIFINANCIAL SERVICES INC.

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 06/14/2005

DATE DEED FILED 06/14/2005

PROPERTY ADDRESS 116 EVERGREEN STREET DUBOIS , PA 15801

**FILED**

JUN 14 2005

0/12/05

William A. Shaw  
Prothonotary/Clerk of Courts

PPS, a

ACW

GW

**SERVICES**

03/02/2005 @ 2:45 PM SERVED CHRISTINE W. WHITMORE

SERVED CHRISTINE W. WHITMORE, DEFENDANT, AT HER RESIDENCE 116 EVERGREEN STREET, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CHRISTINE W. WHITMORE

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

03/02/2005 @ 2:45 PM SERVED RICKY L. WHITMORE

SERVED RICKY L. WHITMORE, DEFENDANT, AT HIS RESIDENCE 116 EVERGREEN STREET, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CHRISTINE W. WHITMORE, WIFE/DEFENDANT,

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20074  
NO: 04-683-CD

PLAINTIFF: CITIFINANCIAL SERVICES INC.

vs.

DEFENDANT: CHRISTINE E. WHITMORE AND RICKY L. WHITMORE

Execution REAL ESTATE

**SHERIFF RETURN**

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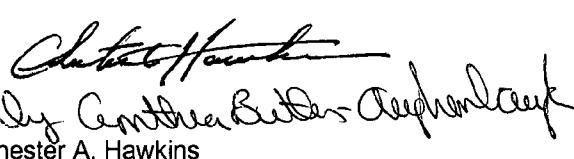
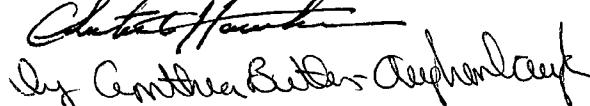
SHERIFF HAWKINS \$231.22

SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This

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

So Answers,

  
by   
Chester A. Hawkins  
Sheriff

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

CITIFINANCIAL SERVICES INC.  
7467 New Ridge Road  
Suite 222  
Hanover, MD 21076

In the Court of Common Pleas of  
Clearfield County

vs.

CHRISTINE E. WHITMORE  
RICKY L. WHITMORE  
116 Evergreen Street  
Dubois, PA 15801

No. 04-683-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: 116 Evergreen Street Dubois, PA 15801

See Exhibit "A" attached

AMOUNT DUE	\$49,380.54
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Interest From 01/02/2004  
Through 12/15/2004

(Costs to be added)

Prothonotary costs 125.00

  
Prothonotary, Common Pleas Court  
of Clearfield County, Pennsylvania

Dated: 12/21/04

Received December 21, 2004 @ 3:00 P.M.  
Cheston A. Waukeens  
by Cynthia Butler Aughenbaugh

Deputy \_\_\_\_\_

ALL THAT CERTAIN PARCEL OF LAND IN 1<sup>ST</sup> WARD OF THE CITY OF DUBOIS,  
CLEARFIELD COUNTY, COMMONWEALTH OF PENNSYLVANIA, AS MORE FULLY  
DESCRIBED IN DEED BOOK 831, PAGE 321, ID# 7.1-07-02034, BEING KNOWN AND  
DESIGNATED AS LOT 11, ALFRED BELL'S ADDITION TO DUBOIS.

BEING PREMISES WHICH ARE MORE FULLY DECSRIBED IN A DEED DATED 4/21/82  
AND RECORDED 4/26/82 IN THE OFFICE OF THE RECORDER OF DEEDS OF  
CLEARFIELD COUNTY, PENNSYLVANIA, IN RECORD BOOK 831 PAGE 321.

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME CHRISTINE W. WHITMORE NO. 04-683-CD

NOW, June 07, 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 May 06, 2005, I exposed the within described real estate of Christine E. Whitmore And Ricky L. Whitmore to public venue or outcry at which time and place I sold the same to CITIFINANCIAL SERVICES 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	15.39
LEVY	15.00
MILEAGE	15.39
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	4.44
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	5.00
CONTINUED SALES	
MISCELLANEOUS	
<b>TOTAL SHERIFF COSTS</b>	<b>\$231.22</b>

**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	49,380.54
INTEREST @ %	0.00
FROM 01/02/2004 TO 05/06/2005	
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	
<b>TOTAL DEBT AND INTEREST</b>	<b>\$49,420.54</b>
<b>COSTS:</b>	
ADVERTISING	260.38
TAXES - COLLECTOR	276.67
TAXES - TAX CLAIM	2,031.87
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	28.50
SHERIFF COSTS	231.22
LEGAL JOURNAL COSTS	144.00
PROTHONOTARY	125.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
<b>TOTAL COSTS</b>	<b>\$3,242.64</b>

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

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

CIMD-0299  
05/06/2005  
\$49,380.54

CITIFINANCIAL SERVICES INC.  
7467 New Ridge Road  
Suite 222  
Hanover, MD 21076

Plaintiff  
vs.

CHRISTINE E. WHITMORE  
RICKY L. WHITMORE  
**Mortgagor(s) and  
Record Owner(s)**

116 Evergreen Street  
Dubois, PA 15801

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 04-683-CD

FILED  
m 19:30 AM NO CC  
MAR 29 2005  
GR  
William A. Shaw  
Prothonotary Clerk of Court

**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.**

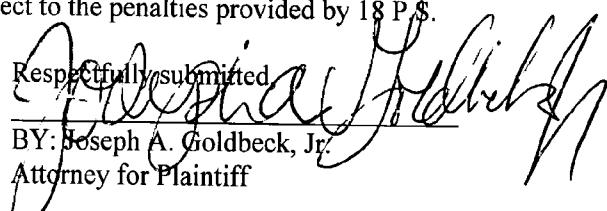
Premises was posted by Sheriff's Office/competent adult (copy of return attached).  
 Certified Mail & ordinary mail by Sheriff's Office (copy of return attached).  
 Certified Mail & ordinary mail by Joseph A. Goldbeck, Jr. (original receipt(s) for Certified Mail attached).

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**

Article Number

2.

3.

4.

5.

6.

7.

8.

Check type of mail or service:		Affix Stamp Here (If issued as a certificate of mailing, or for additional copies of this bill)	
Certified	Recorded Delivery (International)	Postage	Fee
COD	Registered	Handling	Actual Value
Delivery Confirmation	Return Receipt for Merchandise	if Registered	Insured
Express Mail	Signature Confirmation	Value	Due Sender
Insured	Postmark and Date of Receipt	DC	SC
Addressee (Name, Street, City, State, & ZIP Code)	PA DEPARTMENT OF PUBLIC WELFARE -	SH	RD
Bureau of Child Support Enforcement		Fee	Fee
Health and Welfare Bldg. - Room 432		Fee	Fee
P.O. Box 2675		Fee	Fee
Harrisburg, PA 17105-2675		Fee	Fee
DOMESTIC RELATIONS OF CLEARFIELD COUNTY			
230 E. Market Street Clearfield, PA 16830			
BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE			
COMPANY OF PENNSYLVANIA			
237 MAIN STREET RIDGWAY, PA 15853			
BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE			
COMPANY OF PENNSYLVANIA			
90 BEAVER DRIVE SUITE 114 C DUBOIS, PA 15801			
BENEFICIAL CONSUMER DISCOUNT CO.			
961 WEIGEL DRIVE ELMHURST, IL 60126			
TENANTS/OCCUPANTS			
116 Evergreen Street Dubois, PA 15801			
Total Number of Pieces Listed by Sender		Postmaster, Per (Name of receiving employee)	

See Privacy Act Statement on Reverse

PS Form 3877, February 2002 (Page 1 of 2)

Complete by Typewriter, Ink, or Ball Point Pen

CIMD-0299

CHRISTINE E. WHITMORE & RICKY L. WHITMORE

**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

CITIFINANCIAL SERVICES INC.  
7467 New Ridge Road  
Suite 222  
Hanover, MD 21076

Plaintiff

vs.

CHRISTINE E. WHITMORE  
RICKY L. WHITMORE  
**Mortgagor(s) and Record Owner(s)**

116 Evergreen Street  
Dubois, PA 15801

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 04-683-CD

**AFFIDAVIT PURSUANT TO RULE 3129**

CITIFINANCIAL SERVICES 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:

116 Evergreen Street  
Dubois, PA 15801

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

CHRISTINE E. WHITMORE  
116 Evergreen Street  
Dubois, PA 15801

RICKY L. WHITMORE  
116 Evergreen Street  
Dubois, PA 15801

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

CHRISTINE E. WHITMORE  
116 Evergreen Street  
Dubois, PA 15801

RICKY L. WHITMORE  
116 Evergreen Street  
Dubois, PA 15801

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:

BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE  
COMPANY OF PENNSYLVANIA  
237 MAIN STREET  
RIDGWAY, PA 15853

BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE  
COMPANY OF PENNSYLVANIA  
90 BEAVER DRIVE  
SUITE 114 C  
DUBOIS, PA 15801

BENEFICIAL CONSUMER DISCOUNT CO.  
961 WEIGEL DRIVE  
ELMHURST, IL 60126

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  
116 Evergreen Street  
Dubois, PA 15801

(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: March 18, 2005

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

**FILED**

**MAR 29 2005**

William A. Shaw  
Prothonotary/Clerk of Courts

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

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

CITIFINANCIAL SERVICES INC.  
7467 New Ridge Road  
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Plaintiff  
vs.

CHRISTINE E. WHITMORE  
RICKY L. WHITMORE  
**Mortgagor(s) and Record Owner(s)**  
116 Evergreen Street  
Dubois, PA 15801

Defendant(s)

IN THE COURT OF COMMON PLEAS  
of Clearfield County  
CIVIL ACTION - LAW  
ACTION OF MORTGAGE FORECLOSURE  
No. 04-683-CD

**PRAECIPE FOR WRIT OF EXECUTION**

TO THE PROTHONOTARY:

Issue Writ of Execution in the above matter:

Amount Due

\$49,380.54

Interest from  
01/02/2004 to  
12/15/2004 at  
12.0000%

(Costs to be added)

125.00 **Prothonotary costs**

612 100 & 600 units  
100 & 600 units w/prop desc.  
M 100 300 to Sheriff  
DEC 21 2004 Atty pd. 20.00  
William A. Shaw  
Prothonotary, Clerk of Courts

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

Term  
No. 04-683-CD  
IN THE COURT OF COMMON PLEAS  
CITIFINANCIAL SERVICES INC.

vs.

CHRISTINE E. WHITMORE and  
RICKY L. WHITMORE  
(Mortgagor(s) and Record Owner(s))  
116 Evergreen Street  
Dubois, PA 15801

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

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Plaintiff's Attorney  
W. E. McCafferty  
DEC 21 2004

---

Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

---

**Goldbeck McCafferty & McKeever**  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322

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

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7467 New Ridge Road  
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Plaintiff  
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DOMESTIC RELATIONS OF CLEARFIELD COUNTY  
230 E. Market Street  
Clearfield, PA 16830

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COMPANY OF PENNSYLVANIA  
237 MAIN STREET  
RIDGWAY, PA 15853

BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE  
COMPANY OF PENNSYLVANIA  
90 BEAVER DRIVE  
SUITE 114 C  
DUBOIS, PA 15801

BENEFICIAL CONSUMER DISCOUNT CO.  
961 WEIGEL DRIVE  
ELMHURST, IL 60126

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  
116 Evergreen Street  
Dubois, PA 15801

(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: December 15, 2004

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

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

CITIFINANCIAL SERVICES INC.  
7467 New Ridge Road  
Suite 222  
Hanover, MD 21076

In the Court of Common Pleas of  
Clearfield County

vs.

CHRISTINE E. WHITMORE  
RICKY L. WHITMORE  
116 Evergreen Street  
Dubois, PA 15801

No. 04-683-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: 116 Evergreen Street Dubois, PA 15801

See Exhibit "A" attached

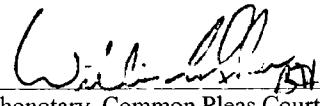
AMOUNT DUE	\$49,380.54
------------	-------------

Interest From 01/02/2004  
Through 12/15/2004

(Costs to be added)

Prothonotary costs 125.00

Dated: 12/21/04

  
Prothonotary, Common Pleas Court  
of Clearfield County, Pennsylvania

Deputy \_\_\_\_\_

Term  
No. 04-683-CD

IN THE COURT OF COMMON PLEAS  
CITIFINANCIAL SERVICES INC.

vs.

CHRISTINE E. WHITMORE and  
RICKY L. WHITMORE  
Mortagor(s)  
116 Evergreen Street Dubois, PA 15801

WRIT OF EXECUTION  
(Mortgage Foreclosure)

REAL DEBT INTEREST from	\$ <u>49,380.54</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	
Judg. Fee	
Cr.	
Sat.	

Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

**Goldbeck McCafferty & McKeever**  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
(215) 627-1322

ALL THAT CERTAIN PARCEL OF LAND IN 1<sup>ST</sup> WARD OF THE CITY OF DUBOIS,  
CLEARFIELD COUNTY, COMMONWEALTH OF PENNSYLVANIA, AS MORE FULLY  
DESCRIBED IN DEED BOOK 831, PAGE 321, ID# 7.1-07-02034, BEING KNOWN AND  
DESIGNATED AS LOT 11, ALFRED BELL'S ADDITION TO DUBOIS.

BEING PREMISES WHICH ARE MORE FULLY DECSRIBED IN A DEED DATED 4/21/82  
AND RECORDED 4/26/82 IN THE OFFICE OF THE RECORDER OF DEEDS OF  
CLEARFIELD COUNTY, PENNSYLVANIA, IN RECORD BOOK 831 PAGE 321.

In the Court of Common Pleas of Clearfield County

CITIFINANCIAL SERVICES INC.  
7467 New Ridge Road  
Suite 222  
Hanover, MD 21076

Plaintiff

vs.

CHRISTINE E. WHITMORE  
RICKY L. WHITMORE  
(Mortgagor(s) and Record Owner(s))  
116 Evergreen Street  
Dubois, PA 15801

No. 04-683-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 CHRISTINE E. WHITMORE and RICKY L. WHITMORE by default for want of an Answer.

Assess damages as follows:

\$49,380.54

Debt

Interest - 01/02/2004 to 12/15/2004

Total

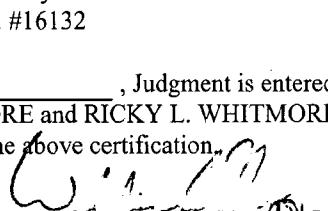
(Assessment of Damages attached)

**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 December 21, 2004, Judgment is entered in favor of  
CITIFINANCIAL SERVICES INC. and against CHRISTINE E. WHITMORE and RICKY L. WHITMORE by default for  
want of an Answer and damages assessed in the sum of \$49,380.54 as per the above certification.

  
Prothonotary

*10/21/04  
Atty pd 20 00  
10/21/04 Notice & Copy of Order  
DEC 21 2004 to Defs  
Anna A. Tracy Statement to Atty  
Prothonotary Clerk of Courts*

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: November 23, 2004

TO:

**RICKY L. WHITMORE**  
116 Evergreen Street  
Dubois, PA 15801

CITIFINANCIAL SERVICES INC.  
7467 New Ridge Road  
Suite 222  
Hanover, MD 21076

*Plaintiff*

vs.  
**CHRISTINE E. WHITMORE**  
**RICKY L. WHITMORE**  
(Mortgagor(s) and Record Owner(s))  
116 Evergreen Street  
Dubois, PA 15801

In the Court of  
Common Pleas  
of Clearfield County

CIVIL ACTION - LAW

Action of  
Mortgage Foreclosure

Term  
No. 04-683-CD

*Defendant(s)*

TO: **RICKY L. WHITMORE**  
116 Evergreen Street  
Dubois, PA 15801

**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: November 23, 2004

TO:

**CHRISTINE E. WHITMORE**  
116 Evergreen Street  
Dubois, PA 15801

CITIFINANCIAL SERVICES INC.  
7467 New Ridge Road  
Suite 222  
Hanover, MD 21076

*Plaintiff*

vs.  
**CHRISTINE E. WHITMORE**  
**RICKY L. WHITMORE**  
(Mortgagor(s) and Record Owner(s))  
116 Evergreen Street  
Dubois, PA 15801

In the Court of  
Common Pleas  
of Clearfield County

CIVIL ACTION - LAW

Action of  
Mortgage Foreclosure

Term  
No. 04-683-CD

*Defendant(s)*

TO: **CHRISTINE E. WHITMORE**  
116 Evergreen Street  
Dubois, PA 15801

**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.

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**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

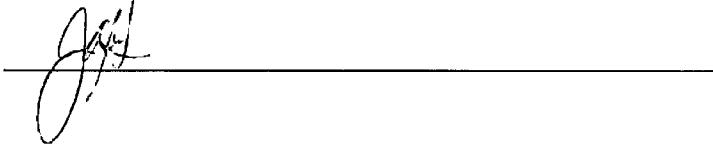
VERIFICATION OF NON-MILITARY SERVICE

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, CHRISTINE E. WHITMORE, is about unknown years of age, that Defendant's last known residence is 116 Evergreen Street, Dubois, PA 15801, 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: 12/15/04



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, RICKY L. WHITMORE, is about unknown years of age, that Defendant's last known residence is 116 Evergreen Street, Dubois, PA 15801, 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:

12/15/01



Rule of Civil Procedure No. 236 – Revised

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

CITIFINANCIAL SERVICES INC.  
7467 New Ridge Road  
Suite 222  
Hanover, MD 21076

Plaintiff

No. 04-683-CD

vs.

CHRISTINE E. WHITMORE  
RICKY L. WHITMORE  
(**Mortgagors and Record Owner(s)**)  
116 Evergreen Street  
Dubois, PA 15801

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:

  
B  
Deputy

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

Joseph A. Goldbeck, Jr.  
**Goldbeck McCafferty & McKeever**  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322

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

CITIFINANCIAL SERVICES INC.  
7467 New Ridge Road  
Suite 222  
Hanover, MD 21076

Plaintiff

vs.

CHRISTINE E. WHITMORE  
RICKY L. WHITMORE  
(Mortgagor(s) and Record owner(s))  
116 Evergreen Street  
Dubois, PA 15801

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

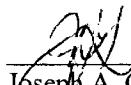
CIVIL ACTION LAW

ACTION OF MORTGAGE FORECLOSURE

No. 04-683-CD

**ORDER FOR JUDGMENT**

Please enter Judgment in favor of CITIFINANCIAL SERVICES INC., and against CHRISTINE E. WHITMORE and RICKY L. WHITMORE 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 \$49,380.54.

  
\_\_\_\_\_  
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 CITIFINANCIAL SERVICES INC. 7467 New Ridge Road Suite 222 Hanover, MD 21076 and that the name(s) and last known address(es) of the Defendant(s) is/are CHRISTINE E. WHITMORE, 116 Evergreen Street Dubois, PA 15801 and RICKY L. WHITMORE, 116 Evergreen Street Dubois, PA 15801;

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

ASSESSMENT OF DAMAGES

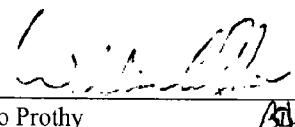
TO THE PROTHONOTARY:

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

Principal Balance	\$41,430.64
Interest from 01/02/2004 through 12/15/2004	\$4,753.37
Attorney's Fee at 5.0000% of principal balance	\$2,071.53
Late Charges	\$0.00
Costs of Suit and Title Search	\$900.00
Title/Appraisal Fee	\$225.00 (\$0.00)
	<hr/> \$49,380.54

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

AND NOW, this 21<sup>st</sup> day of December, 2004 damages are assessed as above.

  
Pro Prothy

  
Bill

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

CitiFinancial Services, Inc.  
Plaintiff(s)

No.: 2004-00683-CD

Real Debt: \$49,380.54

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Christine E. Whitmore  
Ricky L. Whitmore  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: December 21, 2004

Expires: December 21, 2009

Certified from the record this 21st day of December, 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

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

CITIFINANCIAL SERVICES INC.

VS.

WHITMORE, CHRISTINE E. & RICKY L.

**COMPLAINT IN MORTGAGE FORECLOSURE**

Sheriff Docket # 15601

04-683-CD

**SHERIFF RETURNS**

NOW MAY 28, 2004 AT 10:14 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON CHRISTINE E. WHITMORE, DEFENDANT AT RESIDENCE, 116 EVERGREEN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CHRISTINE E. WHITMORE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: MCCLEARY

NOW MAY 28, 2004 AT 10:14 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON RICKY L. WHITMORE, DEFENDANT AT RESIDENCE, 116 EVERGREEN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CHRISTINE E. WHITMORE, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: MCCLEARY

---

**Return Costs**

Cost	Description
38.62	SHERIFF HAWKINS PAID BY: ATTY CK# 200430
20.00	SURCHARGE PAID BY: ATTY CK# 200429

---

Sworn to Before Me This  
8th Day Of May, 2004  
William A. Shaw

So Answers,  
Chester A. Hawkins  
by Maury Harr  
Chester A. Hawkins  
Sheriff

*FILED*  
JUN 08 2004  
*WAS*

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**

---

CITIFINANCIAL SERVICES INC.

7467 New Ridge Road

Suite 222

Hanover, MD 21076

*Plaintiff*

vs.

CHRISTINE E. WHITMORE

RICKY L. WHITMORE

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

116 Evergreen Street

Dubois, PA 15801

*Defendant(s)*

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term

No. *D 4-683-C*

**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 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 ENSEGUNDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELFONO 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 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

*MAY 17 2004*

*William A. Shaw  
Proprietary*

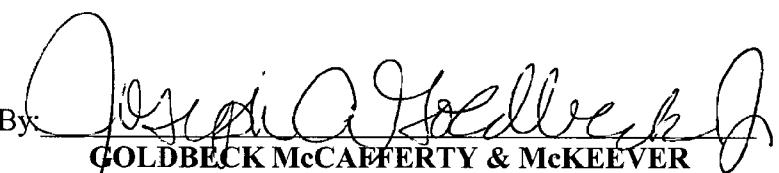
## COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff is CITIFINANCIAL SERVICES INC., 7467 New Ridge Road, Suite 222 Hanover, MD 21076.
2. The name(s) and address(es) of the Defendant(s) is/are CHRISTINE E. WHITMORE, 116 Evergreen Street, Dubois, PA 15801 and RICKY L. WHITMORE, 116 Evergreen Street, Dubois, PA 15801, who is/are the mortgagor(s) and real owner(s) of the mortgaged premises hereinafter described.
3. On October 29, 2001 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to CITIFINANCIAL SERVICES INC., which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Instrument#: 200117389. The mortgage has not been assigned unless said assignment to the Plaintiff is hereafter mentioned. 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 February 02, 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.
6. The following amounts are due on the mortgage:

Principal Balance	\$41,430.64
Interest from 01/02/2004	\$2,056.61
through 05/31/2004 at 12.0000%	
Per Diem interest rate at \$13.62	
Attorney's Fee at 5.0% of Principal Balance	\$2,071.53
Costs of suit and Title Search	\$900.00
	<hr/>
Title/ Appraisal Fee	\$46,458.78
	<hr/>
	+\$225.00
	<hr/>
	\$46,683.78

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. 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.

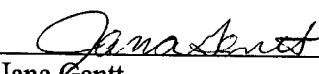
WHEREFORE, Plaintiff demands an in rem judgment in mortgage foreclosure in the sum of \$46,683.78, together with interest at the rate of \$13.62, per day and other expenses incurred by the Plaintiff which are properly chargeable in accordance with the terms of the mortgage, and for the foreclosure and sale of the mortgaged premises.

By:   
**GOLDBECK McCAFFERTY & MCKEEVER**  
BY: JOSEPH A. GOLDBECK, JR., ESQUIRE  
ATTORNEY FOR PLAINTIFF

VERIFICATION

I, Jana Gantt, 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: 5-14-07

  
\_\_\_\_\_  
Jana Gantt  
CITIFINANCIAL SERVICES INC.

KAREN L. STARK  
REGISTER AND RECORDER  
CLEARFIELD COUNTY  
Pennsylvania

INSTRUMENT NUMBER  
200117389

RECORDED ON  
Oct 30, 2001  
10:15:08 AM  
Total Pages: 7

After recording, return to:  
CITIFINANCIAL SERVICES,  
INC.  
RD3 BOX 146H  
DU BOIS PA 15801

## MORTGAGE

THIS MORTGAGE is made this 29th day of October, 2001, between the Mortagor,  
RICKY LEE WHITMORE CHRISTINE E WHITMORE

(herein "Borrower"),

and the Mortgagee, CITIFINANCIAL SERVICES, INC.  
a corporation organized and existing under the laws of Pennsylvania  
whose address is RD3 BOX 146H DU BOIS PA 15801  
(herein "Lender").

WHEREAS, Borrower is indebted to Lender in the principal sum of U.S. \$ 41,659.99, which indebtedness is evidenced by Borrower's note dated 10/29/2001 and extensions and renewals thereof (herein "Note"), providing for monthly installments of principal and interest, with the balance of the indebtedness, if not sooner paid, due and payable on 11/02/2031;

TO SECURE to Lender the repayment of the indebtedness evidenced by the Note, with interest thereon; the payment of all other sums, with the interest thereon, advanced in accordance herewith to protect the security of this Mortgage; and the performance of the covenants and agreements of Borrower herein contained, Borrower does hereby mortgage, grant and convey to Lender the following described property located in the County of CLEARFIELD, State of Pennsylvania:

ALL THAT CERTAIN PARCEL OF LAND IN 1ST WARD OF THE CITY OF DUBOIS,  
CLEARFIELD COUNTY, COMMONWEALTH OF PENNSYLVANIA, AS MORE FULLY  
DESCRIBED IN DEED BOOK 831, PAGE 321, ID# 7.1-07-02034, BEING KNOWN  
AND DESIGNATED AS LOT 11, ALFRED BELL'S ADDITION TO DUBOIS.

BY FEE SIMPLE DEED FROM DELORES WHITMORE, AS SET FORTH IN DEED BOOK  
831, PAGE 321, DATED 04/21/1982 AND RECORDED 04/26/1982, CLEARFIELD  
COUNTY RECORDS, COMMONWEALTH OF PENNSYLVANIA. TOTAL CONSIDERATION  
IS \$6,526.35.

BEING premises which are more fully described in a deed dated the 26th day of APRIL, 1982,  
and recorded in the Office of the Recorder of Deeds of CLEARFIELD  
County, Pennsylvania, in Record Book 831, Volume , Page 321 .

PA 0042-8 7/2000 Original (Recorded) Copy (Branch) Copy (Customer) Page 1 of 7

**REPRESENTATION OF PRINTED DOCUMENT**  
**7107 8381 6540 0502 0977**

91649 000051  
 RICKY LEE WHITMORE  
 CHRISTINE WHITMORE  
 116 EVERGREEN ST  
 DUBOIS PA 15801

**EXHIBIT A**

RE: CitiFinancial Loan#: 05-0071-0223421  
 Property Address: 116 EVERGREEN ST  
 DUBOIS PA 15801

**ACT 91 NOTICE**  
**DATE OF NOTICE: April 14, 2004**

**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 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 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 any 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 notificación obtenga una traducción inmediatamente llamando esta agencia (Pennsylvania Housing Finance Agency) sin cargos al número mencionado arriba. Puedes ser elegible para un préstamo por el programa llamado "Homeowner's Emergency Mortgage Assistance Program" el cual puede salvar su casa de la pérdida del derecho a redimir su hipoteca.**

Prepared by: CITIFINANCIAL SERVICES, INC.  
 6010 FAIRVIEW ROAD  
 CHARLOTTE NC 28210

## REPRESENTATION OF PRINTED DOCUMENT

Date: April 14, 2004

Homeowners Name: **RICKY LEE WHITMORE**  
**CHRISTINE WHITMORE**  
 Property Address: **116 EVERGREEN ST**  
**DUBOIS PA 15801**  
 Loan Account No.: **05-0071-0223421**  
 Lender/Servicer: **CITIFINANCIAL SERVICES, INC.**

**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 PROVISIONS OF THE HOMEOWNER'S EMERGENCY  
MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR  
EMERGENCY MORTGAGE ASSISTANCE:**

**\* IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR  
CONTROL,**

**\* IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR  
MORTGAGE PAYMENTS, AND**

**\* IF 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 foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the designated consumer credit counseling agencies listed at the end of this Notice.

**THIS MEETING MUST OCCUR WITHIN THE NEXT (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 meet with one of the consumer credit counseling agencies listed at the end of this notice, the lender may **NOT** take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face-to-face meeting. Advise your lender immediately of your intentions.

**APPLICATION FOR MORTGAGE ASSISTANCE** - Your mortgage is in default for the reasons set forth later in this Notice (see 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, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. 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

## REPRESENTATION OF PRINTED DOCUMENT

complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your fact-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. They 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 Pennsylvania Housing Finance Agency of its decision on your application.

**NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION 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.)

HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).

NATURE OF THE DEFAULT - The Mortgage debt held by the above lender on your property located at: 116 EVERGREEN ST, DUBOIS PA 15801 IS SERIOUSLY IN DEFAULT because:

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

- (a) Monthly payments (including late charges) from 02/02/04 through present.
- (b) Other charges; Escrow, Inspections, NSF Check
- (c) **TOTAL AMOUNT OF (a) and (b) REQUIRED AS OF THIS DATE \$1480.05**

HOW TO CURE THE DEFAULT - You may cure the default within **THIRTY (30) DAYS** of the date of this notice **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER WHICH IS \$1480.05** PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and send to

CITIFINANCIAL SERVICES, INC., 6010 FAIRVIEW ROAD, CHARLOTTE NC 28210

IF YOU DO NOT CURE THE DEFAULT - If you do not cure the default within THIRTY (30) DAYS of the date of this Notice, the lender 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 chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within THIRTY (30) DAYS, the lender also intends to instruct its attorneys to start 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 refers your case to its attorneys, but you cure the delinquency before the lender brings legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against

## REPRESENTATION OF PRINTED DOCUMENT

you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, 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 attorney's fees.

**OTHER LENDER REMEDIES** - The lender 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 or other charges then due, reasonable attorney's 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 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 a Sheriff's Sale of the mortgaged property could be held would be approximately four (4) to six (6) 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. Of course, 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 by contacting the lender.

**HOW TO CONTACT THE LENDER:**

**Name of Lender:** CITIFINANCIAL SERVICES, INC.

**Address:** 6010 FAIRVIEW ROAD  
CHARLOTTE NC 28210

**Phone Number:** 800-525-2004

**Contact Person:** BRANCH MANAGER

**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 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, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

**REPRESENTATION OF PRINTED DOCUMENT**

**YOU MAY ALSO HAVE THE RIGHT:**

- \* TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO 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 THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- \* TO ASSERT THE NONEXISTENCE 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.
- \* TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

**If you are represented by an Attorney, please refer this letter to such Attorney and provide us with such Attorney's name, address and telephone number.**

**To the extent your obligations have been discharged, or are subject to an automatic stay of bankruptcy order under Title 11 of the United States Code, this notice is for compliance and informational purposes only and does not constitute a demand for payment or any attempt to collect any such obligation.**

**REPRESENTATION OF PRINTED DOCUMENT**

**PENNSYLVANIA HOUSING FINANCE AGENCY**  
**HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM**

**CONSUMER CREDIT COUNSELING AGENCIES**

**CLEARFIELD COUNTY**

KEYSTONE ECONOMIC DEVELOPMENT CORPORATION  
1954 Mary Crace Lane  
Johnstown, PA 15901  
(814) 535-6556  
FAX (814) 539-1688

CCCS OF WESTERN PENNSYLVANIA INC.  
217 East Plank Road  
Altoona, PA 16602  
(814) 944-8100  
FAX (814) 944-5747

CCCS OF WESTERN PENNSYLVANIA  
219-A College Park Plaza  
Johnstown, PA 15904  
(814) 539-6335

INDIANA CO COMMUNITY ACTION PROGRAM  
827 Water Street, Box 187  
Indiana, PA 15701  
(724) 465-2657  
FAX (412) 465-5118

CCCS OF NORTHEASTERN PA  
1631 South Atherton Street  
Suite 100  
State College, PA 16801  
(814) 238-3668  
FAX (814) 238-3669

11:05 AM '04 to 05:00 PM '04  
MAY 17 2004

William A. Schrey  
Prothonotary