

In The Court of Common Pleas of Clearfield County, Pennsylvania

HOMEQ SERVICING CORPORATION f/k/a TMS MORTGAGE

Sheriff Docket #

15619

VS.

04-710-CD

DOE, JOHN and or Tenant/Occupant

COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW JUNE 23, 2004 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURN THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO JOHN DOE and TENANT/OCCUPANT AT ROLLINGSTONE ROAD, PO BOX 115, KYLERTOWN, PA. ATTEMPTED, NOT HOME.

Return Costs

Cost	Description
42.24	SHERIFF HAWKINS PAID BY: ATTY CK# 11905
20.00	SURCHARGE PAID BY: ATTY CK# 11906

Sworn to Before Me This

23rd Day Of June 2004

William A. Shaw

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,

Chester A. Hawkins

Chester A. Hawkins
Sheriff

FILED

01210204
JUN 23 2004

WAS
William A. Shaw
Prothonotary/Clerk of Courts

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

ATTORNEY FOR PLAINTIFF

**WE HEREBY CERTIFY THE
WITHIN TO BE A TRUE AND
CORRECT COPY OF THE ORIGINAL**

Homeq Servicing Corporation
f/k/a TMS Mortgage Inc.
d/b/a The Money Store
1100 Corporate Center Drive
Raleigh, NC 27607-5066
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 04-710-W

v.

John Doe
and/or Tenant/Occupant
Rollingstone Road
P.O. Box 115
Kylertown, PA 16847 (Premises)
Defendant(s)

CIVIL ACTION
COMPLAINT IN EJECTMENT

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LAWYERS REFERRAL SERVICE
Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
100 South Street
P.O. Box 186
Harrisburg, PA 17108
800-692-7375

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

MAY 19 2004

Attest.

William L. Shaw
Prothonotary/
Clerk of Courts

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

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1. Plaintiff is the corporation or individual named on the caption, and whose address or principal office appears in the caption.

2. Defendant(s) are those named as such on the caption, and occupy the premises (hereinafter "Premises") which address is set forth on the caption.

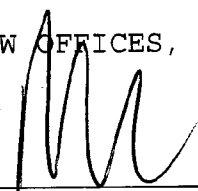
3. Premises, a legal description of which is attached hereto, was sold at Sheriff's Sale in accordance with law on May 7, 2004, and Plaintiff became owner thereof as a result of being the successful bidder and thus the purchaser at said sale, and remains real owner thereof. (Abstract of Title).

4. The person(s) in possession of Premises are the Defendant(s) herein, and are occupying Premises without right or claim to title.

5. Plaintiff has demanded possession of Premises from Defendant(s) who have refused to deliver up the possession thereof.

WHEREFORE, Plaintiff demands judgment for immediate possession of Premises, issuance of a Writ of Possession and a judgment of its costs and disbursement in this action.

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire
ATTORNEY FOR PLAINTIFF

ALL THAT CERTAIN LOT OF LAND WITH A HOUSE ERECTED THEREON SITUATE IN THE TOWNSHIP OF COOPER, COUNTY OF CLEARFIELD, COMMONWEALTH OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIPE, SAID PIPE BEING ALONG THE EASTERN RIGHT-OF-WAY OF L. R. 17067 AND THE SOUTHWEST CORNER OF THE LAND OF DURVIN AND ROSALIND WICK; THENCE ALONG THE LOT OF DURVIN AND ROSALIND WICK, SOUTH SEVENTY-SEVEN DEGREES THIRTY-FIVE MINUTES EAST (S 77 DEGREES 35 MINUTES E), TWO HUNDRED FIVE AND FORTY-FIVE HUNDREDTHS (205.45) FEET TO AN IRON PIPE; THENCE ALONG AN ALLEY, SOUTH ZERO DEGREES ZERO MINUTES (50 DEGREES 00 MINUTES), FIFTY-SEVEN AND SEVENTY-NINE HUNDREDTHS (57.79) FEET TO AN IRON PIPE; THENCE ALONG THE LAND OF MAX D. AND ANNE E. BETTS, NORTH SEVENTY-SEVEN DEGREES THIRTY-FIVE MINUTES WEST (N 77 DEGREES 35 MINUTES W) TWO HUNDRED FIVE AND FORTY-FIVE HUNDREDTHS (205.45) FEET TO A POINT ALONG THE EASTERN RIGHT-OF-WAY OF L. R. 17067; THENCE ALONG THE RIGHT-OF-WAY OF L. R. 17067, NORTH ZERO DEGREES ZERO MINUTES (N 0 DEGREES 00 MINUTES) FIFTY-SEVEN AND SEVENTY-NINE HUNDREDTHS (57.79) FEET TO AN IRON PIPE AND PLACE OF BEGINNING.

CONTAINING 0.27 ACRES.

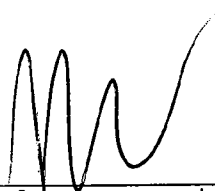
BEING KNOWN AS ROLLINGSTONE ROAD, PO BOX 115, KYLERTOWN, PA 16847

PROPERTY ID NO. 110-R08-551-00003

VERIFICATION

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation; that he is authorized to take this verification and does so because Plaintiff must verify through agents and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the facts set forth in the foregoing pleading are true and correct to the best of his knowledge information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end, positioned above a horizontal line.

Mark J. Udren, Esquire

DATED: May 17, 2004

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
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f/k/a TMS Mortgage Inc.
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Raleigh, NC 27607-5066
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 04-710-CD

v.

John Doe
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Rollingstone Road
P.O. Box 115
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Defendant(s)

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AVISO

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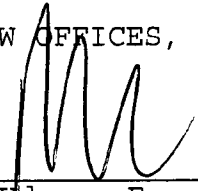
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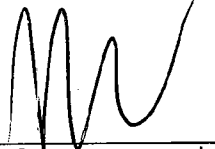
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Plaintiff

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NO. 04-710-22

v.

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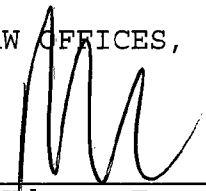
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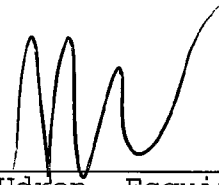
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DATED: May 17, 2004

FILED 2005H

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Attg udren pd. 85.00

William A. Shaw
Prothonotary/Clerk of Courts