

04-1280-CD  
CITIFINANCIAL MORTGAGE CO., INC VS RICHARD SEDGWICK, et al

Citifinancial vs Richard Sedgwick et al  
2004-1280-CD

FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQ., Id. No. 12248  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

11-9-04 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

*William A. Shaw*  
Deputy Prothonotary

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

COURT OF COMMON PLEAS

CIVIL DIVISION *Dec 23, 2004* Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

TERM

NO. *04-1280-05* Deputy Prothonotary

Plaintiff

CLEARFIELD COUNTY

v.

RICHARD R. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

ANITA P. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

Defendant(s)

**FILED** *2600*  
*7/11/04*  
AUG 19 2004 *4cc shff*  
*Any pd. 85.00*

William A. Shaw  
Prothonotary/Clerk of Courts

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**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 this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE  
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION  
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),  
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF  
THE DEBT OR ANY PORTION THEREOF. IF  
DEFENDANT(S) DO SO IN WRITING WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
OBTAIN AND PROVIDE DEFENDANT(S) WITH  
WRITTEN VERIFICATION THEREOF;  
OTHERWISE, THE DEBT WILL BE ASSUMED TO  
BE VALID. LIKEWISE, IF REQUESTED WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
SEND DEFENDANT(S) THE NAME AND ADDRESS  
OF THE ORIGINAL CREDITOR, IF DIFFERENT  
FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT  
UNTIL THE END OF THE THIRTY (30) DAY  
PERIOD FOLLOWING FIRST CONTACT WITH  
YOU BEFORE SUING YOU TO COLLECT THIS  
DEBT. EVEN THOUGH THE LAW PROVIDES  
THAT YOUR ANSWER TO THIS COMPLAINT IS  
TO BE FILED IN THIS ACTION WITHIN TWENTY  
(20) DAYS, YOU MAY OBTAIN AN EXTENSION OF  
THAT TIME. FURTHERMORE, NO REQUEST  
WILL BE MADE TO THE COURT FOR A  
JUDGMENT UNTIL THE EXPIRATION OF THIRTY  
(30) DAYS AFTER YOU HAVE RECEIVED THIS  
COMPLAINT. HOWEVER, IF YOU REQUEST  
PROOF OF THE DEBT OR THE NAME AND  
ADDRESS OF THE ORIGINAL CREDITOR WITHIN  
THE THIRTY (30) DAY PERIOD THAT BEGINS  
UPON YOUR RECEIPT OF THIS COMPLAINT,  
THE LAW REQUIRES US TO CEASE OUR  
EFFORTS (THROUGH LITIGATION OR  
OTHERWISE) TO COLLECT THE DEBT UNTIL  
WE MAIL THE REQUESTED INFORMATION TO  
YOU. YOU SHOULD CONSULT AN ATTORNEY  
FOR ADVICE CONCERNING YOUR RIGHTS AND  
OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND  
RECEIVED A DISCHARGE, THIS IS NOT AN  
ATTEMPT TO COLLECT A DEBT. IT IS AN  
ACTION TO ENFORCE A LIEN ON REAL ESTATE.**

1. Plaintiff is

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY,  
INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

2. The name(s) and last known address(es) of the Defendant(s) are:

RICHARD R. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

ANITA P. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 08/31/2000 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 2000129470.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 02/06/2004 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$46,394.61
Interest	3,609.22
01/06/2004 through 08/18/2004 (Per Diem \$15.97)	
Attorney's Fees	1,250.00
Cumulative Late Charges	59.67
8/31/2000 to 08/18/2004	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 51,863.50
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
<b>TOTAL</b>	<b>\$ 51,863.50</b>

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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. This action does not come under Act 91 of 1983 because the mortgage premises is not the principal residence of Defendant(s).

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 51,863.50, together with interest from 08/18/2004 at the rate of \$15.97 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN AND PHELAN, LLP  
By: Francis S. Hallinan  
FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

## LEGAL DESCRIPTION

All that certain lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

BEGINNING at a post on Ida Street at the Southeast corner of Lot No.1127; thence along said Street two hundred and fifty-nine (259) feet to post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No.1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No.1188 in the general plan of the village of West Houtzdale; and having thereon erected a two story, frame dwelling house.

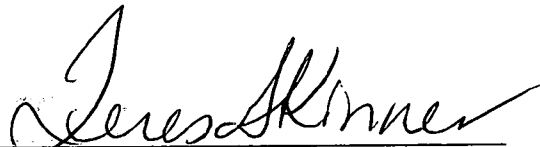
BEING the same premises which became vested in Ernest B. Sedgwick and Anita P. Sedgwick by Deed of Mary E Lorigen, dated October 7,1963 and recorded in Clearfield County Deed Book 504, page 646. Ernest B. Sedgwick having died on April 7, 1994,thereby vesting complete title in Anita P. Sedgwick, by operation of law.

UNDER AND SUBJECT to all exceptions, reservations, restrictions, conditions, easements, rights and rights of way as contained in prior deeds and instruments of record.

Being Known As: RR1 Box 10 ida street

VERIFICATION

TERESA SKINNER hereby states that she is NORTHEAST REGIONAL  
MANAGER of CITIFINANCIAL MORTGAGE COMPANY, INC., mortgage  
servicing agent for the plaintiff in this matter, that she is authorized to take this  
Verification, and that the statements made in the foregoing Civil Action in  
Mortgage Foreclosure are true and correct to the best of her knowledge,  
information and belief. The undersigned understands that this statement is made  
subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to  
authorities

  
TERESA SKINNER

DATE 8/16/14

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

CITIFINANCIAL MORTGAGE COMPANY INC.

Sheriff Docket # 16149

VS.

04-1280-CD

SEDGEWICK, RICHARD R. & ANITA P.

COMPLAINT IN MORTGAGE FORECLOSURE

**SHERIFF RETURNS**

NOW SEPTEMBER 2, 2004 AT 9:55 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON RICHARD R. SEDGEWICK, DEFENDANT AT RESIDENCE, 307 E. CHERRY ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO RICHARD R. SEDGEWICK (2) TWO TRUE AND ATTESTED COPIES OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

RESIDENCE AT RR#1 BOX 10, IDA ST., HOUTZDALE, PA. IS "EMPTY".

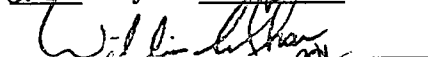
NOW SEPTEMBER 21, 2004 AFTER DILIGENT SEARCH IN MY BALIWICK I RETURN THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE (2 COPIES) "NOT FOUND" AS TO ANITA P. SEDGEWICK, DEFENDANT IS "DECEASED".

**Return Costs**

Cost	Description
53.87	SHERIFF HAWKINS PAID BY: ATTY CK# 372082
40.00	SURCHARGE PAID BY: ATTY CK# 373307

Sworn to Before Me This

23<sup>rd</sup> Day Of Sept. 2004



WILLIAM A. SHAW

Prothonotary

My Commission Expires

1st Monday in Jan. 2006

Clearfield Co., Clearfield, PA

So Answers,



Chester A. Hawkins

Sheriff

**FILED**

01815904  
SEP 23 2004

William A. Shaw  
Prothonotary/Clerk of Courts



FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQ., Id. No. 12248  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 04-1280-CD

CLEARFIELD COUNTY

Plaintiff

v.

RICHARD R. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

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

AUG 19 2004

ANITA P. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

Attest.

*William L. Shaw*  
Prothonotary/  
Clerk of Courts

Defendant(s)

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**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 this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

**No Notice to Defend**  
David S. Meholisk, Court Administrator  
Clearfield County Courthouse  
5th and Market Streets  
Clearfield, PA 16830  
814-765-2641 x5982  
**FEDERMAN AND PHELAN**

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE  
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION  
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),  
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF  
THE DEBT OR ANY PORTION THEREOF. IF  
DEFENDANT(S) DO SO IN WRITING WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
OBTAIN AND PROVIDE DEFENDANT(S) WITH  
WRITTEN VERIFICATION THEREOF;  
OTHERWISE, THE DEBT WILL BE ASSUMED TO  
BE VALID. LIKEWISE, IF REQUESTED WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
SEND DEFENDANT(S) THE NAME AND ADDRESS  
OF THE ORIGINAL CREDITOR, IF DIFFERENT  
FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT  
UNTIL THE END OF THE THIRTY (30) DAY  
PERIOD FOLLOWING FIRST CONTACT WITH  
YOU BEFORE SUING YOU TO COLLECT THIS  
DEBT. EVEN THOUGH THE LAW PROVIDES  
THAT YOUR ANSWER TO THIS COMPLAINT IS  
TO BE FILED IN THIS ACTION WITHIN TWENTY  
(20) DAYS, YOU MAY OBTAIN AN EXTENSION OF  
THAT TIME. FURTHERMORE, NO REQUEST  
WILL BE MADE TO THE COURT FOR A  
JUDGMENT UNTIL THE EXPIRATION OF THIRTY  
(30) DAYS AFTER YOU HAVE RECEIVED THIS  
COMPLAINT. HOWEVER, IF YOU REQUEST  
PROOF OF THE DEBT OR THE NAME AND  
ADDRESS OF THE ORIGINAL CREDITOR WITHIN  
THE THIRTY (30) DAY PERIOD THAT BEGINS  
UPON YOUR RECEIPT OF THIS COMPLAINT,  
THE LAW REQUIRES US TO CEASE OUR  
EFFORTS (THROUGH LITIGATION OR  
OTHERWISE) TO COLLECT THE DEBT UNTIL  
WE MAIL THE REQUESTED INFORMATION TO  
YOU. YOU SHOULD CONSULT AN ATTORNEY  
FOR ADVICE CONCERNING YOUR RIGHTS AND  
OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND  
RECEIVED A DISCHARGE, THIS IS NOT AN  
ATTEMPT TO COLLECT A DEBT. IT IS AN  
ACTION TO ENFORCE A LIEN ON REAL ESTATE.**

1. Plaintiff is

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY,  
INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

2. The name(s) and last known address(es) of the Defendant(s) are:

RICHARD R. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

ANITA P. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 08/31/2000 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 2000129470.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 02/06/2004 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$46,394.61
Interest	3,609.22
01/06/2004 through 08/18/2004 (Per Diem \$15.97)	
Attorney's Fees	1,250.00
Cumulative Late Charges	59.67
8/31/2000 to 08/18/2004	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 51,863.50
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
<b>TOTAL</b>	<b>\$ 51,863.50</b>

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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. This action does not come under Act 91 of 1983 because the mortgage premises is not the principal residence of Defendant(s).

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 51,863.50, together with interest from 08/18/2004 at the rate of \$15.97 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN AND PHELAN, LLP

By: Francis S. Hallinan

FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

## LEGAL DESCRIPTION

All that certain lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

BEGINNING at a post on Ida Street at the Southeast corner of Lot No.1127; thence along said Street two hundred and fifty-nine (259) feet to post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No.1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No.1188 in the general plan of the village of West Houtzdale; and having thereon erected a two story, frame dwelling house.

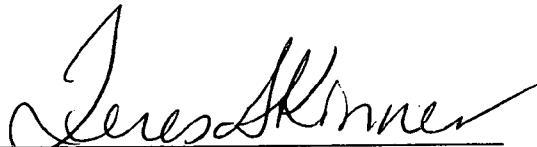
BEING the same premises which became vested in Ernest B. Sedgwick and Anita P. Sedgwick by Deed of Mary E Lorigen, dated October 7,1963 and recorded in Clearfield County Deed Book 504, page 646. Ernest B. Sedgwick having died on April 7, 1994,thereby vesting complete title in Anita P. Sedgwick, by operation of law.

UNDER AND SUBJECT to all exceptions, reservations, restrictions, conditions, easements, rights and rights of way as contained in prior deeds and instruments of record.

Being Known As: RR1 Box 10 ida street

VERIFICATION

TERESA SKINNER hereby states that she is NORTHEAST REGIONAL  
MANAGER of CITIFINANCIAL MORTGAGE COMPANY, INC., mortgage  
servicing agent for the plaintiff in this matter, that she is authorized to take this  
Verification, and that the statements made in the foregoing Civil Action in  
Mortgage Foreclosure are true and correct to the best of her knowledge,  
information and belief. The undersigned understands that this statement is made  
subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to  
authorities

  
TERESA SKINNER

DATE 8/16/4

FEDERMAN AND PHELAN, LLP  
By: FRANK FEDERMAN, ESQ., Id. No. 12248  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 04-1280-CD

CLEARFIELD COUNTY

Plaintiff

v.

RICHARD R. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

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

ANITA P. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

AUG 19 2004

Attest.

*William B. Shaw*  
Prothonotary/  
Clerk of Courts

Defendant(s)

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**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 this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
David S. Micholick, Court Administrator  
Clearfield County Courthouse  
2nd and Market Streets  
Clearfield, PA 16830  
(814) 765-2641  
FEDERMAN AND PHELAN

7  
**IF THIS IS THE FIRST NOTICE THAT YOU HAVE  
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION  
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),  
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF  
THE DEBT OR ANY PORTION THEREOF. IF  
DEFENDANT(S) DO SO IN WRITING WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
OBTAIN AND PROVIDE DEFENDANT(S) WITH  
WRITTEN VERIFICATION THEREOF;  
OTHERWISE, THE DEBT WILL BE ASSUMED TO  
BE VALID. LIKEWISE, IF REQUESTED WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
SEND DEFENDANT(S) THE NAME AND ADDRESS  
OF THE ORIGINAL CREDITOR, IF DIFFERENT  
FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT  
UNTIL THE END OF THE THIRTY (30) DAY  
PERIOD FOLLOWING FIRST CONTACT WITH  
YOU BEFORE SUING YOU TO COLLECT THIS  
DEBT. EVEN THOUGH THE LAW PROVIDES  
THAT YOUR ANSWER TO THIS COMPLAINT IS  
TO BE FILED IN THIS ACTION WITHIN TWENTY  
(20) DAYS, YOU MAY OBTAIN AN EXTENSION OF  
THAT TIME. FURTHERMORE, NO REQUEST  
WILL BE MADE TO THE COURT FOR A  
JUDGMENT UNTIL THE EXPIRATION OF THIRTY  
(30) DAYS AFTER YOU HAVE RECEIVED THIS  
COMPLAINT. HOWEVER, IF YOU REQUEST  
PROOF OF THE DEBT OR THE NAME AND  
ADDRESS OF THE ORIGINAL CREDITOR WITHIN  
THE THIRTY (30) DAY PERIOD THAT BEGINS  
UPON YOUR RECEIPT OF THIS COMPLAINT,  
THE LAW REQUIRES US TO CEASE OUR  
EFFORTS (THROUGH LITIGATION OR  
OTHERWISE) TO COLLECT THE DEBT UNTIL  
WE MAIL THE REQUESTED INFORMATION TO  
YOU. YOU SHOULD CONSULT AN ATTORNEY  
FOR ADVICE CONCERNING YOUR RIGHTS AND  
OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND  
RECEIVED A DISCHARGE, THIS IS NOT AN  
ATTEMPT TO COLLECT A DEBT. IT IS AN  
ACTION TO ENFORCE A LIEN ON REAL ESTATE.**



1. Plaintiff is

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY,  
INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

2. The name(s) and last known address(es) of the Defendant(s) are:

RICHARD R. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

ANITA P. SEDGEWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 08/31/2000 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 2000129470.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 02/06/2004 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$46,394.61
Interest	3,609.22
01/06/2004 through 08/18/2004 (Per Diem \$15.97)	
Attorney's Fees	1,250.00
Cumulative Late Charges	59.67
8/31/2000 to 08/18/2004	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 51,863.50
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
<b>TOTAL</b>	<b>\$ 51,863.50</b>

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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. This action does not come under Act 91 of 1983 because the mortgage premises is not the principal residence of Defendant(s).

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 51,863.50, together with interest from 08/18/2004 at the rate of \$15.97 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN AND PHELAN, LLP

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

  
/s/Francis S. Hallinan

FRANK FEDERMAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

## LEGAL DESCRIPTION

All that certain lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

BEGINNING at a post on Ida Street at the Southeast corner of Lot No.1127; thence along said Street two hundred and fifty-nine (259) feet to post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No.1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No.1188 in the general plan of the village of West Houtzdale; and having thereon erected a two story, frame dwelling house.

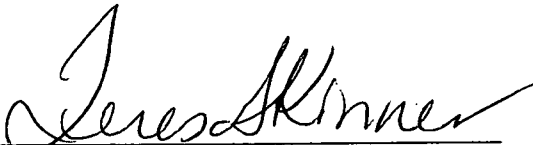
BEING the same premises which became vested in Ernest B. Sedgwick and Anita P. Sedgwick by Deed of Mary E Lorigen, dated October 7,1963 and recorded in Clearfield County Deed Book 504, page 646. Ernest B. Sedgwick having died on April 7, 1994,thereby vesting complete title in Anita P. Sedgwick, by operation of law.

UNDER AND SUBJECT to all exceptions, reservations, restrictions, conditions, easements, rights and rights of way as contained in prior deeds and instruments of record.

Being Known As: RR1 Box 10 ida street

VERIFICATION

TERESA SKINNER hereby states that she is NORTHEAST REGIONAL  
MANAGER of CITIFINANCIAL MORTGAGE COMPANY, INC., mortgage  
servicing agent for the plaintiff in this matter, that she is authorized to take this  
Verification, and that the statements made in the foregoing Civil Action in  
Mortgage Foreclosure are true and correct to the best of her knowledge,  
information and belief. The undersigned understands that this statement is made  
subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to  
authorities

  
\_\_\_\_\_  
TERESA SKINNER

DATE 8/16/4

FEDERMAN PHELAN, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 04-1280-CD

CLEARFIELD COUNTY

Plaintiff

v.

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

Defendants

**CIVIL ACTION - LAW**  
**REINSTATED**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**FILED**  
*m 11:29 by [unclear] 11/9/04*  
*-3cc to shb Reinstated*  
NOV 09 2004

William A. Shaw  
Prothonotary

**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 this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

IF THIS IS THE FIRST NOTICE THAT YOU HAVE  
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:

PURSUANT TO THE FAIR DEBT COLLECTION  
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),  
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF  
THE DEBT OR ANY PORTION THEREOF. IF  
DEFENDANT(S) DO SO IN WRITING WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
OBTAIN AND PROVIDE DEFENDANT(S) WITH  
WRITTEN VERIFICATION THEREOF;  
OTHERWISE, THE DEBT WILL BE ASSUMED TO  
BE VALID. LIKEWISE, IF REQUESTED WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
SEND DEFENDANT(S) THE NAME AND ADDRESS  
OF THE ORIGINAL CREDITOR, IF DIFFERENT  
FROM ABOVE.

THE LAW DOES NOT REQUIRE US TO WAIT  
UNTIL THE END OF THE THIRTY (30) DAY  
PERIOD FOLLOWING FIRST CONTACT WITH  
YOU BEFORE SUING YOU TO COLLECT THIS  
DEBT. EVEN THOUGH THE LAW PROVIDES  
THAT YOUR ANSWER TO THIS COMPLAINT IS  
TO BE FILED IN THIS ACTION WITHIN TWENTY  
(20) DAYS, YOU MAY OBTAIN AN EXTENSION OF  
THAT TIME. FURTHERMORE, NO REQUEST  
WILL BE MADE TO THE COURT FOR A  
JUDGMENT UNTIL THE EXPIRATION OF THIRTY  
(30) DAYS AFTER YOU HAVE RECEIVED THIS  
COMPLAINT. HOWEVER, IF YOU REQUEST  
PROOF OF THE DEBT OR THE NAME AND  
ADDRESS OF THE ORIGINAL CREDITOR WITHIN  
THE THIRTY (30) DAY PERIOD THAT BEGINS  
UPON YOUR RECEIPT OF THIS COMPLAINT,  
THE LAW REQUIRES US TO CEASE OUR  
EFFORTS (THROUGH LITIGATION OR  
OTHERWISE) TO COLLECT THE DEBT UNTIL  
WE MAIL THE REQUESTED INFORMATION TO  
YOU. YOU SHOULD CONSULT AN ATTORNEY  
FOR ADVICE CONCERNING YOUR RIGHTS AND  
OBLIGATIONS IN THIS SUIT.

IF YOU HAVE FILED BANKRUPTCY AND  
RECEIVED A DISCHARGE, THIS IS NOT AN  
ATTEMPT TO COLLECT A DEBT. IT IS AN  
ACTION TO ENFORCE A LIEN ON REAL ESTATE.

1. Plaintiff is

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY,  
INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

2. The name(s) and last known address(es) of the Defendant(s) are:

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.


3. On 08/31/2000 RICHARD SEDGWICK and ANITA P. SEDGWICK made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200012947
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 02/06/2004 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$46,394.61
Interest	4,838.91
01/06/2004 through 11/03/2004 (Per Diem \$15.97)	
Attorney's Fees	1,250.00
Cumulative Late Charges	59.67
09/06/2000 to 11/03/2004	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 53,093.19
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
<b>TOTAL</b>	<b>\$ 53,093.19</b>

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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. Mortgagor ANITA P. SEDGWICK, died on 03/26/2002, and upon information and belief, her surviving heirs are RICHARD SEDGWICK and UNKNOWN PARTIES
10. Plaintiff contacted the Register of Wills of Clearfield County and was informed as of 11/03/2004, no estate has been raised on behalf of the decedent mortgagor.
11. Plaintiff hereby releases ANITA P. SEDGWICK, from liability for the debt secured by the mortgage.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 53,093.19, together with interest from 11/03/2004 at the rate of \$15.97 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN PHELAN, LLP  
By:   
/s/ Francis S. Hallinan  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff



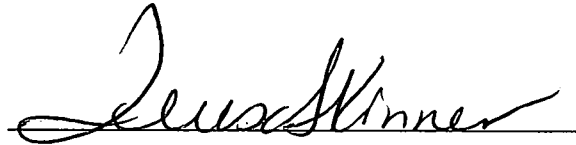
ALL THAT CERTAIN lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

BEGINNING at a post on Ida Street at the Southeast corner of Lot No. 1127; thence along said Street two hundred and fifty-nine (259) feet to a post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No. 1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No. 1188 in the General Plan of the village of West Houtzdale; and having thereon erected a two story frame dwelling, house.

RPEMISES BEING: RR 1 BOX 10 IDA STREET

**VERIFICATION**

TERESA SKINNER hereby states that he/she is NORTHEAST REGIONAL MANAGER of CITIFINANCIAL MORTGAGE COMPANY, INC. mortgage servicing agent or Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.



DATE: 01/01/04

FEDERMAN AND PHELAN, LLP  
BY: FRANK FEDERMAN, ESQUIRE

Identification No. 62695  
Suite 1400, One Penn Center Plaza  
Philadelphia, PA 19103  
(215) 563-7000

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

v.

CLEARFIELD COUNTY

RICHARD R. SEDGEWICK

NO. 04-1280-CD

ANITA P. SEDGEWICK

**PRAECIPE TO CORRECT CAPTION**  
**ON COMPLAINT IN MORTGAGE FORECLOSURE**

TO THE PROTHONOTARY:

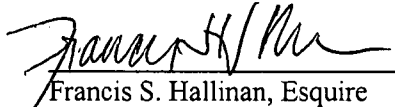
KINDLY, correct the caption on Plaintiff's Complaint, as the last name of the defendants was listed incorrectly as SEDGEWICK. The correct spelling of the defendants' names is:

RICHARD R. SEDGWICK

ANITA P. SEDGWICK

Kindly change the information on the docket.

DATE: 11/24/04

  
Francis S. Hallinan, Esquire  
Attorney for Plaintiff

EGK  
**FILED** <sup>10</sup>cc  
m/12:48/04  
NOV 29 2004

William A. Shaw  
Prothonotary/Clerk of Courts

FEDERMAN AND PHELAN, LLP  
BY: FRANK FEDERMAN, ESQUIRE  
Identification No. 62695  
Suite 1400, One Penn Center Plaza  
Philadelphia, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

COURT OF COMMON PLEAS  
CIVIL DIVISION

v.

CLEARFIELD COUNTY

RICHARD R. SEDGEWICK

NO. 04-1280-CD

ANITA P. SEDGEWICK

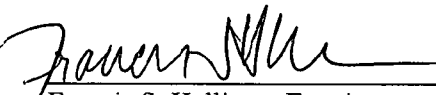
**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Plaintiff's Praecipe to Correct Caption on Complaint in Mortgage Foreclosure was sent via first class mail to the Defendants on the date listed below:

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS OF  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

Date: 11/24/04

  
Francis S. Hallinan, Esquire  
Attorney for Plaintiff

FILED  
m/12:48B  
NOV 29 2004

William A. Shaw  
Prothonotary/Clerk of Courts

6x  
FEDERMAN AND PHELAN  
BY: FRANCIS S. HALLINAN, Esquire  
ATTORNEY I.D. #62695  
One Penn Center at Suburban Station,  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

COURT OF COMMON PLEAS  
CIVIL DIVISION

v.

NO. <sup>04</sup>~~014~~-1280-CD

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED

CLEARFIELD COUNTY

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS CLAIMING  
RIGHT, TITLE OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED

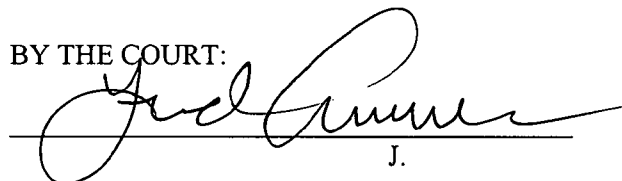
**ORDER**

AND NOW, this <sup>6<sup>th</sup></sup> day of <sup>Dec</sup>, 2004, upon consideration of  
Plaintiff's Motion for Service Pursuant to Special Order of court, it is hereby;

ORDERED that Plaintiff may obtain service of the Complaint on UNKNOWN HEIRS,  
SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING  
RIGHT, TITLE, OR INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED by  
mailing a true and correct copy of the complaint by Certified mail and Regular mail and by  
posting the mortgaged premises at RR1 BOX 10 IDA STREET, CLEARFIELD, PA 16651.

Service of the aforementioned mailings is effective upon the date of mailing and is to be  
done by Plaintiff's attorney, who will file with the Prothonotary's Office an Affidavit of Service.

BY THE COURT:

  
J.

FILED

013:03  
DEC 06 2004

William A. Shaw  
Prothonotary/Clerk of Courts

EGK  
ICC  
Atty  
Hallinan

FEDERMAN AND PHELAN  
BY: FRANCIS S. HALLINAN, Esquire  
ATTORNEY I.D. #62695  
One Penn Center at Suburban Station,  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

COURT OF COMMON PLEAS  
CIVIL DIVISION

v.

NO. <sup>04</sup>014-1280-CD

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED

CLEARFIELD COUNTY

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS CLAIMING  
RIGHT, TITLE OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED

**MOTION FOR SERVICE PURSUANT TO  
SPECIAL ORDER OF COURT**

Plaintiff, CITIFINANCIAL MORTGAGE COMPANY, INC., by its counsel, Francis S. Hallinan, Esquire, respectfully requests that this Honorable Court enter an ORDER granting Plaintiff's Motion for Service Pursuant to Special Order of Court in the above captioned matter and in support thereof avers the following:

1. On 8/31/00, RICHARD SEDGWICK AND ANITA P. SEDGWICK, made, executed and delivered a Mortgage upon premises known as RR1 BOX 10 IDA STREET, CLEARFIELD, PA 16651.

2. The loan is in default as payments due 2/6/04 and each month thereafter remain due and unpaid.

**FILED** <sup>NO</sup> <sup>cc</sup>  
m 10:55 AM  
NOV 29 2004  
William A. Shaw  
Prothonotary/Clerk of Courts

3. Mortgagor, ANITA P. SEDGWICK, died on 3/26/02, and upon information and belief, her surviving heir at law is RICHARD SEDGWICK. Any other parties who may have an interest in the mortgaged premises are unknown to Plaintiff. Attached hereto, made a part hereof, and marked as Exhibit "A" is a true and correct copy of the Affidavit of Good Faith Investigation.

4. Plaintiff contacted the Register of Wills of CLEARFIELD County and was informed that no estate has been raised on behalf of the decedent mortgagor.

5. Plaintiff performed additional investigation to locate RICHARD SEDGWICK, HEIR OF ANITA P. SEDGWICK, DECEASED. Attached hereto, marked as Exhibit "B" is a true and correct copy of Plaintiff's Affidavit of Good Faith Investigation.

6. By letter dated 10/20/04, Plaintiff attempted to contact RICHARD SEDGWICK, HEIR OF ANITA P. SEDGWICK, DECEASED to inform him of the foreclosure. Plaintiff attached with its letter a waiver by heir of right to be named as a defendant. Plaintiff also requested additional heir information for ANITA P. SEDGWICK, DECEASED. To date, Plaintiff has not received a response or executed waiver from RICHARD SEDGWICK. Attached hereto, marked as Exhibit "C" is a true and correct copy of Plaintiff's letter.

7. Plaintiff had filed its original Action in Mortgage Foreclosure on or about 8/19/04, naming RICHARD R. SEDGWICK AND ANITA P. SEDGWICK as defendants. Thereafter, Plaintiff ascertained that defendant ANITA P. SEDGWICK is deceased. On 11/9/04, Plaintiff filed a reinstated complaint naming as defendants, RICHARD SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED, and the UNKNOWN HEIRS OF ANITA P. SEDGWICK, DECEASED. Attached hereto, marked as Exhibit "D" is a true and correct copy of the Reinstated Complaint in Mortgage Foreclosure.

8. Plaintiff hereby releases ANITA P. SEDGWICK from liability for the debt secured by the mortgage.

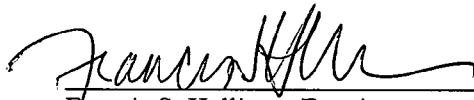
9. No one has come forward to save the mortgaged property from foreclosure.

10. In order to convey clear and marketable title after a foreclosure sale, title companies customarily require the foreclosing mortgagee name as a defendant the unknown heirs, successors, assigns and all persons, firms or associations claiming right, title or interest from or under the decedent mortgagor.

11. It deserves special mention that Plaintiff's action is merely seeking a judgment in rem in order to divest all claims against the mortgaged premises.

12. Because there may be parties with an interest in the mortgaged premises who Plaintiff does not know of, Plaintiff must effectuate service through Special Order of Court.

**WHEREFORE**, Plaintiff respectfully requests this Honorable Court enter an Order pursuant to Pennsylvania Rule of Civil Procedure 430 directing service of the Complaint by Regular Mail, Certified Mail and by posting the premises.

  
\_\_\_\_\_  
Francis S. Hallinan, Esquire  
Attorney for Plaintiff



# EXHIBIT "A"

**SKN Data Research Inc.**  
**AFFIDAVIT OF GOOD FAITH INVESTIGATION**

File Number: **D-14088**  
Attorney Firm: **Federman & Phelan**  
Subject: **Anita Sedgwick**

Current Address: **RR1 Box 10 Ida St. Clearfield, PA 16651**  
Property Address: **RR1 Box 10 Ida St. Clearfield, PA 16651**  
Mailing Address: **RR1 Box 10 Ida St. Clearfield, PA 16651**

**I Scott Nulty, being duly sworn according to law, do hereby depose and state as follows, on 10-13-04 I conducted an investigation into the whereabouts of the above-noted individual(s) and have discovered the following:**

**I. CREDIT INFORMATION**

**A. SOCIAL SECURITY NUMBER**

**Our search verified the following information to be true and correct**  
**Anita Sedgwick - 165-54-6042**

**B. EMPLOYMENT SEARCH**

**Anita Sedgwick - A review of the credit reporting agencies provided no employment information.**

**C. INQUIRY OF CREDITORS**

**Our inquiry of creditors indicated that Anita Sedgwick reside(s) at: RR1 Box 10 Ida St. Clearfield, PA 16651**

**II. INQUIRY OF TELEPHONE COMPANY**

**A. DIRECTORY ASSISTANCE SEARCH**

**We contacted 814-359-2771 registered at 307 Cherry St. several times and received the answering machine..**

**III. INQUIRY OF NEIGHBORS**

**Our office attempted to contact neighbors, they were not able to verify that Anita Sedgwick reside(s) at: RR1 Box 10 Ida St. Clearfield, PA 16651**

**IV. ADDRESS INQUIRY**

**A. NATIONAL ADDRESS UPDATE**

**We reviewed the National Address database and found the following information,**  
**Anita Sedgwick - RR1 Box 10 Ida St. Clearfield, PA 16651**

**B. ADDITIONAL ACTIVE MAILING ADDRESSES**

**Per our inquiry of creditors, the following is a possible mailing address: no addresses on file**

**V. DRIVERS LICENSE INFORMATION**

**A. MOTOR VEHICLE & DMV OFFICE**

**Per the PA Department of Motor Vehicles, we were unable to obtain address information on Anita Sedgwick.**

**VI. OTHER INQUIRIES**

**A. DEATH RECORDS**

**Vital Records and all public databases have death record on file for Anita Sedgwick.**

B. COUNTY VOTER REGISTRATION

The County Voter registration was unable to confirm a registration for Anita Sedgwick residing at: last registered address.

VII. ADDITIONAL INFORMATION OF SUBJECT

A. DATE OF BIRTH

Anita Sedgwick -YOB 1923

B. A.K.A.

none

\* All accessible public databases have been checked and cross-referenced for the above named individual(s).

\* Please be advised all database information indicates the subject resides at the current address.

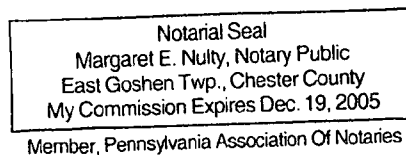
The undersigned understands that this statement herein is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

I hereby verify that the statements made herein are true and correct to the best of my knowledge, information and belief and that this affidavit of investigation is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

  
AFFIANT Scott K. Nulty  
SKN Data Research Inc. President

Sworn to and subscribed before me this 13<sup>th</sup> day of October 2004

  
NOTARY PUBLIC



The above information is obtained from available public records  
and we are only liable for the cost of the affidavit

## SSN Death Index

**1 match(es) found (matches 1 - 1 on this page)**

#	Name	Born	Died	SSN	Zip
1	ANITA P SEDGWICK	01/09/1923	03/26/2002	165546042	16866

# **EXHIBIT "B"**

7127240

**SKN Data Research Inc.**  
**AFFIDAVIT OF GOOD FAITH INVESTIGATION**

File Number: 4-11928PA  
Attorney Firm: **Federman & Phelan**  
Subject: **Richard R. Sedgewick**

Current Address: **307 E. Cherry St. Clearfield, PA 16830**  
Property Address: **RR1 Box 10 Ida St. Clearfield, PA 16651**  
Mailing Address: **307 E. Cherry St. Clearfield, PA 16830**

**I Scott Nulty, being duly sworn according to law, do hereby depose and state as follows, I have conducted an investigation into the whereabouts of the above-noted individual(s) and have discovered the following:**

**I. CREDIT INFORMATION**

**A. SOCIAL SECURITY NUMBER**

**Our search verified the following information to be true and correct**  
**Richard R. Sedgewick - 177-58-5979**

**B. EMPLOYMENT SEARCH**

**Richard R. Sedgewick - Beaver Block Co. 121 N. Harrison Rd. Pleasant Gap, PA 19823 - 5/20 spoke to male who confirmed Richard works there.**

**C. INQUIRY OF CREDITORS**

**Our inquiry of creditors indicated that Richard R. Sedgewick reside(s) at: 307 E. Cherry St. Clearfield, PA 16830**

**II. INQUIRY OF TELEPHONE COMPANY**

**A. DIRECTORY ASSISTANCE SEARCH**

**On 5-20-04 our office contacted directory assistance which indicated that Richard R. Sedgewick reside(s) at: 307 E. Cherry St. Clearfield, PA 16830. Our office made a telephone call to the mortgagors phone number and received the following information: 814-359-2771 5/20 12:20p spoke to male who confirmed work address.**

**III. INQUIRY OF NEIGHBORS**

**Our office attempted to contact R. Dixon 309 E. Cherry St. Clearfield, PA 16830, they were not able to verify that Richard R. Sedgewick reside(s) at: 307 E. Cherry St. Clearfield, PA 16830**

**IV. ADDRESS INQUIRY**

**A. NATIONAL ADDRESS UPDATE**

**On 5-20-04 we reviewed the National Address database and found the following information, Richard R. Sedgewick - 307 E. Cherry St. Clearfield, PA 16830**

**B. ADDITIONAL ACTIVE MAILING ADDRESSES**

**Per our inquiry of creditors, the following is a possible mailing address: 307 E. Cherry St. Clearfield, PA 16830**

**V. DRIVERS LICENSE INFORMATION**

**A. MOTOR VEHICLE & DMV OFFICE**

**Per the PA Department of Motor Vehicles, we were unable to obtain address information on Richard R. Sedgewick.**

**VI. OTHER INQUIRIES**

**A. DEATH RECORDS**

**As of 5-20-04 Vital Records and all public databases have no death record on file for Richard R. Sedgewick.**

B. COUNTY VOTER REGISTRATION

The Clearfield County Voter registration was unable to confirm a registration for  
Richard R. Sedgewick residing at: last registered address.

VII. ADDITIONAL INFORMATION OF SUBJECT

A. DATE OF BIRTH

Richard R. Sedgewick -YOB 1982

B. A.K.A.

none

\* All accessible public databases have been checked and cross-referenced for the  
above named individual(s).

\* Please be advised all database information indicates the subject resides at the  
current address.

The undersigned understands that this statement herein is made subject to the penalties of  
18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

I hereby verify that the statements made herein are true and correct to the best of my  
knowledge, information and belief and that this affidavit of investigation is made subject to the  
penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

  
\_\_\_\_\_  
AFFIANT Scott K. Nulty  
SKN Data Research Inc. President

Sworn to and subscribed before me this 20<sup>th</sup> day of May 2004

  
\_\_\_\_\_  
NOTARY PUBLIC

Notarial Seal  
Margaret E. Nulty, Notary Public  
East Goshen Twp., Chester County  
My Commission Expires Dec. 19, 2005  
Member, Pennsylvania Association Of Notaries

The above information is obtained from available public records  
and we are only liable for the cost of the affidavit

# **EXHIBIT "C"**



**FEDERMAN AND PHELAN, L.L.P.**  
Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000  
Fax: 215-563-4491  
Jennifer.Redling@fedphe.com

**Jennifer Redling**  
Legal Assistant, Decedent Department

**Representing Lenders in**  
Pennsylvania and New Jersey

October 20, 2004

Richard Sedgwick, Individually  
And Heir of Anita P. Sedgwick, Deceased  
307 East Cherry Street  
Clearfield, PA 16830

**FILE COPY**

**RE: ANITA P. SEDGWICK; RRI BOX 10 IDA STREET, CLEARFIELD, PA 16651**  
**CITIFINANCIAL MORTGAGE; NO. 2129296**

Dear Mr. Sedgwick:

Kindly be advised that the Law Offices of Federman and Phelan represent CITIFINANCIAL MORTGAGE, the holder of the mortgage against the above-referenced mortgaged premises. The loan is in default as payments due 2/6/04 and each month thereafter remain due and unpaid. Our office has been retained to bring a foreclosure action.

Our office has been informed of ANITA P. SEDGWICK'S unfortunate death. We are sorry for your loss. As you are an heir of ANITA P. SEDGWICK, you were automatically vested with an ownership interest in the mortgaged premises upon her death under 20 Pa.C.S.A. §301(b). Accordingly, it will be necessary to bring a foreclosure action against your interest in the property.

This letter serves to afford you an opportunity to waive your right to be named as a defendant in the foreclosure action. Please find attached a Waiver which I would appreciate your executing and returning to the undersigned within **fourteen (14)** days of the date of this correspondence.

If the Waiver is timely returned, and the Court does not require the mortgagee to raise an estate on behalf of the decedent mortgagor, it will not be necessary to name you as a Defendant in the foreclosure action, in your capacity as heir. If, however, the Waiver is not timely returned, our office will proceed to name you as a Defendant. It will, however, be necessary to name you as a defendant in the foreclosure as you are Co-Mortgagor and Record Owner of the premises.

---

\* This firm is a debt collector. Any information we receive will be used for that purpose. If your personal liability for the debt has been discharged in bankruptcy, we are only proceeding against the real estate secured by the mortgage.

Please contact the undersigned to provide any additional information for the heirs of ANITA P. SEDGWICK, DECEASED, as they too have an ownership interest in the premises. Thank you for your cooperation in this regard.

Please note that this waiver does not preclude you from attempting to sell the subject premises and recovering any possible equity in the mortgaged premises prior to the completion of the foreclosure action.

**If you would like to request a payoff or reinstatement figure, please call (215) 563-7000, and ask for the Foreclosure Resolution Department. If you have any other questions regarding this letter, please contact the undersigned at (215) 563-7000, ex. 1200.**

Very truly yours,



Jennifer Redling  
Legal Assistant

---

\* This firm is a debt collector. Any information we receive will be used for that purpose. If your personal liability for the debt has been discharged in bankruptcy, we are only proceeding against the real estate secured by the mortgage.

FEDERMAN AND PHELAN, LLP

By: Francis S. Hallinan

Identification No. 62695

Suite 1400

One Penn Center Plaza

Philadelphia, PA 19103

Attorney for Plaintiff

---

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

v.

ESTATE OF ANITA P. SEDGWICK, DECEASED

---

**WAIVER BY HEIR OF RIGHT TO BE NAMED  
AS A DEFENDANT IN FORECLOSURE ACTION**

I, RICHARD SEDGWICK, Heir of ANITA P. SEDGWICK, DECEASED, hereby waive my right to be named as a defendant in a foreclosure action to be instituted by CITIFINANCIAL MORTGAGE COMPANY, INC. involving a mortgage secured on premises RR1, BOX 10, IDA STREET, CLEARFIELD, PA 16651, which property was owned by decedent at the time of her death.

I hereby consent to the foreclosure action, without any further notice of proceedings of Sheriff's sale, and understand that any interest I may have in the mortgaged premises will be divested upon completion of the foreclosure action.

I understand it is Plaintiff's intention to name me as a defendant in the foreclosure as I am Co-Mortgagor and Record Owner of the premises.

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

\_\_\_\_\_  
Richard Sedgwick, Heir  
Of Anita P. Sedgwick, Deceased

---

\* This firm is a debt collector. Any information we receive will be used for that purpose. If your personal liability for the debt has been discharged in bankruptcy, we are only proceeding against the real estate secured by the mortgage.

# **EXHIBIT “D”**

FEDERMAN PHELAN, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 04-1280-CD

Plaintiff

v.

CLEARFIELD COUNTY

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

Defendants

**CIVIL ACTION – LAW**  
**REINSTATED**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**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 this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**Lawyer Referral Service:**

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

**Notice to Defend:**

David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record  
FEDERMAN AND PHELAN

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977), DEFENDANT(S) MAY DISPUTE THE VALIDITY OF THE DEBT OR ANY PORTION THEREOF. IF DEFENDANT(S) DO SO IN WRITING WITHIN THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING, COUNSEL FOR PLAINTIFF WILL OBTAIN AND PROVIDE DEFENDANT(S) WITH WRITTEN VERIFICATION THEREOF; OTHERWISE, THE DEBT WILL BE ASSUMED TO BE VALID. LIKEWISE, IF REQUESTED WITHIN THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING, COUNSEL FOR PLAINTIFF WILL SEND DEFENDANT(S) THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR, IF DIFFERENT FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL THE END OF THE THIRTY (30) DAY PERIOD FOLLOWING FIRST CONTACT WITH YOU BEFORE SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH THE LAW PROVIDES THAT YOUR ANSWER TO THIS COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.**

1. Plaintiff is

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY,  
INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

2. The name(s) and last known address(es) of the Defendant(s) are:

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.

3. On 08/31/2000 RICHARD SEDGWICK and ANITA P. SEDGWICK made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200012947
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 02/06/2004 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$46,394.61
Interest	4,838.91
01/06/2004 through 11/03/2004 (Per Diem \$15.97)	
Attorney's Fees	1,250.00
Cumulative Late Charges	59.67
09/06/2000 to 11/03/2004	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 53,093.19
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
<b>TOTAL</b>	<b>\$ 53,093.19</b>

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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. Mortgagor ANITA P. SEDGWICK, died on 03/26/2002, and upon information and belief, her surviving heirs are RICHARD SEDGWICK and UNKNOWN PARTIES
10. Plaintiff contacted the Register of Wills of Clearfield County and was informed as of 11/03/2004, no estate has been raised on behalf of the decedent mortgagor.
11. Plaintiff hereby releases ANITA P. SEDGWICK, from liability for the debt secured by the mortgage.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 53,093.19, together with interest from 11/03/2004 at the rate of \$15.97 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN PHELAN, LLP

By:

  
/s/ Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff



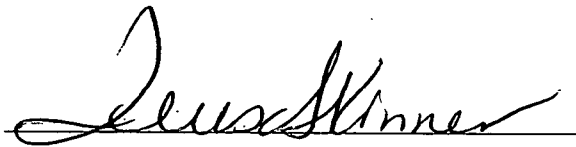
ALL THAT CERTAIN lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

BEGINNING at a post on Ida Street at the Southeast corner of Lot No. 1127; thence along said Street two hundred and fifty-nine (259) feet to a post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No. 1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No. 1188 in the General Plan of the village of West Houtzdale; and having thereon erected a two story frame dwelling, house.

RPEMISES BEING: RR 1. BOX 10 IDA STREET

**VERIFICATION**

TERESA SKINNER hereby states that he/she is NORTHEAST REGIONAL MANAGER of CITIFINANCIAL MORTGAGE COMPANY, INC. mortgage servicing agent or Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "Teresa Skinner", is written over a horizontal line.

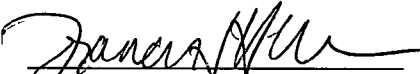
DATE: 01/01/04

VERIFICATION

Francis S. Hallinan, Esquire, hereby states that he is the Attorney for the Plaintiff in this action, that he is authorized to take this Affidavit, and that the statements made in the foregoing **MOTION FOR SERVICE OF THE COMPLAINT IN MORTGAGE FORECLOSURE PURSUANT TO SPECIAL ORDER OF COURT** are true and correct to the best of his knowledge, information, and belief.

The undersigned understands that this statement herein is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

Date: 11/24/04

  
Francis S. Hallinan, Esquire  
Attorney for Plaintiff

FEDERMAN AND PHELAN  
BY: FRANCIS S. HALLINAN, Esquire  
ATTORNEY I.D. #62695  
One Penn Center at Suburban Station,  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

COURT OF COMMON PLEAS  
CIVIL DIVISION

v.

NO. 014-1280-CD

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED

CLEARFIELD COUNTY

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS AND ALL PERSONS,  
FIRMS OR ASSOCIATIONS CLAIMING  
RIGHT, TITLE OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED


**CERTIFICATION OF SERVICE**

I hereby certify a true and correct copy of the foregoing Plaintiff's Motion for  
Special Service was served by regular mail on Defendant (s) on the date listed below:

RICHARD SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS OF  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

11/24/04  
Date

  
Francis S. Hallinan, Esquire  
Attorney for Plaintiff

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., ID. NO. 32227  
FRANCIS S. HALLINAN, ESQ., ID. NO. 62695  
DANIEL G. SCHMIEG, ESQ., ID. NO. 62205  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY,  
INC., F/K/A

: COURT OF COMMON PLEAS

:

: CIVIL DIVISION

ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY,  
INC.

:

: CLEARFIELD County

Plaintiff

vs.

RICHARD R. SEDGWICK  
ANITA P. SEDGWICK

:

: No. 04-1280-CD

:

:

:

Defendants

**FILED**

DEC 23 2004

*William A. Shaw*  
Prothonotary

*ISSUED 1 REIN STATE  
COMPLAIN TO SHFL*

**PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE**

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP  
By: *LS Hall*  
FRANCIS S. HALLINAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
DANIEL G. SCHMIEG, ESQUIRE  
Attorneys for Plaintiff

Date: December 20, 2004

/cdc, Svc Dept.  
File# 93100

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

CITIFINANCIAL MORTGAGE COMPANY INC.

Sheriff Docket # 16149

VS.

04-1280-CD

SEDGEWICK, RICHARD R. & ANITA P.

COMPLAINT IN MORTGAGE FORECLOSURE

**SHERIFF RETURNS**

NOW DECEMBER 23, 2004 RETURN THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED" AS TO RICHARD R. SEDGWICK/SEDGEWICK and UNKNOWN HEIRS, DEFENDANTS. TWO SPELLINGS OF DEFENDANTS LAST NAME UNKNOWN WHICH IS CORRECT.


**Return Costs**

Cost	Description
15.00	SHERIFF HAWKINS PAID BY: ATTY CK# 386276
20.00	SURCHARGE PAID BY: ATTY

Sworn to Before Me This

So Answers,

\_\_\_\_ Day Of \_\_\_\_\_ 2004

  
Chester A. Hawkins  
Sheriff

**FILED**

01/19/05  
JAN 19 2005

William A. Shaw  
Prothonotary/Clerk of Courts

FEDERMAN PHELAN, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

11-9-04 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

*William L. Shaw*  
Deputy Prothonotary

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 04-1280-CD

CLEARFIELD COUNTY

Plaintiff

v.

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

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

NOV 09 2004

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

Attest.

*William L. Shaw*  
Prothonotary/  
Clerk of Courts

Defendants

**CIVIL ACTION - LAW**  
**REINSTATED**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**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 this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**Lawyer Referral Service:**

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

**Notice to Defend:**

David S. Meholic, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record  
FEDERMAN AND PHELAN

7

IF THIS IS THE FIRST NOTICE THAT YOU HAVE  
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:

PURSUANT TO THE FAIR DEBT COLLECTION  
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),  
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF  
THE DEBT OR ANY PORTION THEREOF. IF  
DEFENDANT(S) DO SO IN WRITING WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
OBTAIN AND PROVIDE DEFENDANT(S) WITH  
WRITTEN VERIFICATION THEREOF;  
OTHERWISE, THE DEBT WILL BE ASSUMED TO  
BE VALID. LIKEWISE, IF REQUESTED WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
SEND DEFENDANT(S) THE NAME AND ADDRESS  
OF THE ORIGINAL CREDITOR, IF DIFFERENT  
FROM ABOVE.

THE LAW DOES NOT REQUIRE US TO WAIT  
UNTIL THE END OF THE THIRTY (30) DAY  
PERIOD FOLLOWING FIRST CONTACT WITH  
YOU BEFORE SUING YOU TO COLLECT THIS  
DEBT. EVEN THOUGH THE LAW PROVIDES  
THAT YOUR ANSWER TO THIS COMPLAINT IS  
TO BE FILED IN THIS ACTION WITHIN TWENTY  
(20) DAYS, YOU MAY OBTAIN AN EXTENSION OF  
THAT TIME. FURTHERMORE, NO REQUEST  
WILL BE MADE TO THE COURT FOR A  
JUDGMENT UNTIL THE EXPIRATION OF THIRTY  
(30) DAYS AFTER YOU HAVE RECEIVED THIS  
COMPLAINT. HOWEVER, IF YOU REQUEST  
PROOF OF THE DEBT OR THE NAME AND  
ADDRESS OF THE ORIGINAL CREDITOR WITHIN  
THE THIRTY (30) DAY PERIOD THAT BEGINS  
UPON YOUR RECEIPT OF THIS COMPLAINT,  
THE LAW REQUIRES US TO CEASE OUR  
EFFORTS (THROUGH LITIGATION OR  
OTHERWISE) TO COLLECT THE DEBT UNTIL  
WE MAIL THE REQUESTED INFORMATION TO  
YOU. YOU SHOULD CONSULT AN ATTORNEY  
FOR ADVICE CONCERNING YOUR RIGHTS AND  
OBLIGATIONS IN THIS SUIT.

IF YOU HAVE FILED BANKRUPTCY AND  
RECEIVED A DISCHARGE, THIS IS NOT AN  
ATTEMPT TO COLLECT A DEBT. IT IS AN  
ACTION TO ENFORCE A LIEN ON REAL ESTATE.



1. Plaintiff is

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY,  
INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

2. The name(s) and last known address(es) of the Defendant(s) are:

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.

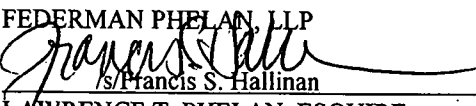
3. On 08/31/2000 RICHARD SEDGWICK and ANITA P. SEDGWICK made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200012947
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 02/06/2004 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$46,394.61
Interest	4,838.91
01/06/2004 through 11/03/2004 (Per Diem \$15.97)	
Attorney's Fees	1,250.00
Cumulative Late Charges	59.67
09/06/2000 to 11/03/2004	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 53,093.19
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
<b>TOTAL</b>	<b>\$ 53,093.19</b>

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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. Mortgagor ANITA P. SEDGWICK, died on 03/26/2002, and upon information and belief, her surviving heirs are RICHARD SEDGWICK and UNKNOWN PARTIES
10. Plaintiff contacted the Register of Wills of Clearfield County and was informed as of 11/03/2004, no estate has been raised on behalf of the decedent mortgagor.
11. Plaintiff hereby releases ANITA P. SEDGWICK, from liability for the debt secured by the mortgage.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 53,093.19, together with interest from 11/03/2004 at the rate of \$15.97 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN PHELAN, LLP  
By:   
s/ Francis S. Hallinan  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

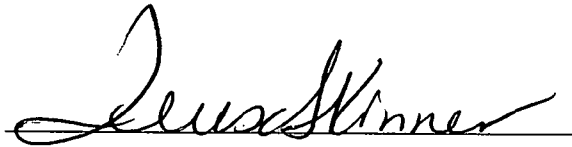
7  
ALL THAT CERTAIN lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

BEGINNING at a post on Ida Street at the Southeast corner of Lot No. 1127; thence along said Street two hundred and fifty-nine (259) feet to a post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No. 1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No. 1188 in the General Plan of the village of West Houtzdale; and having thereon erected a two story frame dwelling, house.

RPEMISES BEING: RR 1 BOX 10 IDA STREET

**VERIFICATION**

TERESA SKINNER hereby states that he/she is NORTHEAST REGIONAL MANAGER of CITIFINANCIAL MORTGAGE COMPANY, INC. mortgage servicing agent or Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "Teresa Skinner", written over a horizontal line.

DATE: 11/01/04

FEDERMAN PHELAN, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

11-9-04 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

*William L. Shaw*  
Deputy Prothonotary

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 04-1280-CD

CLEARFIELD COUNTY

Plaintiff

v.

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

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

NOV 09 2004

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

Attest.

*William L. Shaw*  
Prothonotary/  
Clerk of Courts

Defendants

**CIVIL ACTION - LAW**  
**REINSTATED**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**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 this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record  
FEDERMAN AND PHELAN

7  
**IF THIS IS THE FIRST NOTICE THAT YOU HAVE  
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION  
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),  
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF  
THE DEBT OR ANY PORTION THEREOF. IF  
DEFENDANT(S) DO SO IN WRITING WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
OBTAIN AND PROVIDE DEFENDANT(S) WITH  
WRITTEN VERIFICATION THEREOF;  
OTHERWISE, THE DEBT WILL BE ASSUMED TO  
BE VALID. LIKEWISE, IF REQUESTED WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
SEND DEFENDANT(S) THE NAME AND ADDRESS  
OF THE ORIGINAL CREDITOR, IF DIFFERENT  
FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT  
UNTIL THE END OF THE THIRTY (30) DAY  
PERIOD FOLLOWING FIRST CONTACT WITH  
YOU BEFORE SUING YOU TO COLLECT THIS  
DEBT. EVEN THOUGH THE LAW PROVIDES  
THAT YOUR ANSWER TO THIS COMPLAINT IS  
TO BE FILED IN THIS ACTION WITHIN TWENTY  
(20) DAYS, YOU MAY OBTAIN AN EXTENSION OF  
THAT TIME. FURTHERMORE, NO REQUEST  
WILL BE MADE TO THE COURT FOR A  
JUDGMENT UNTIL THE EXPIRATION OF THIRTY  
(30) DAYS AFTER YOU HAVE RECEIVED THIS  
COMPLAINT. HOWEVER, IF YOU REQUEST  
PROOF OF THE DEBT OR THE NAME AND  
ADDRESS OF THE ORIGINAL CREDITOR WITHIN  
THE THIRTY (30) DAY PERIOD THAT BEGINS  
UPON YOUR RECEIPT OF THIS COMPLAINT,  
THE LAW REQUIRES US TO CEASE OUR  
EFFORTS (THROUGH LITIGATION OR  
OTHERWISE) TO COLLECT THE DEBT UNTIL  
WE MAIL THE REQUESTED INFORMATION TO  
YOU. YOU SHOULD CONSULT AN ATTORNEY  
FOR ADVICE CONCERNING YOUR RIGHTS AND  
OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND  
RECEIVED A DISCHARGE, THIS IS NOT AN  
ATTEMPT TO COLLECT A DEBT. IT IS AN  
ACTION TO ENFORCE A LIEN ON REAL ESTATE.**

1. Plaintiff is

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY,  
INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

2. The name(s) and last known address(es) of the Defendant(s) are:

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.

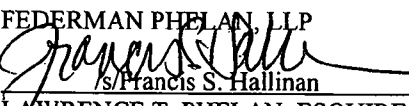
3. On 08/31/2000 RICHARD SEDGWICK and ANITA P. SEDGWICK made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200012947
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 02/06/2004 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$46,394.61
Interest	4,838.91
01/06/2004 through 11/03/2004 (Per Diem \$15.97)	
Attorney's Fees	1,250.00
Cumulative Late Charges	59.67
09/06/2000 to 11/03/2004	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 53,093.19
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
<b>TOTAL</b>	<b>\$ 53,093.19</b>

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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. Mortgagor ANITA P. SEDGWICK, died on 03/26/2002, and upon information and belief, her surviving heirs are RICHARD SEDGWICK and UNKNOWN PARTIES
10. Plaintiff contacted the Register of Wills of Clearfield County and was informed as of 11/03/2004, no estate has been raised on behalf of the decedent mortgagor.
11. Plaintiff hereby releases ANITA P. SEDGWICK, from liability for the debt secured by the mortgage.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 53,093.19, together with interest from 11/03/2004 at the rate of \$15.97 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN PHELAN, LLP  
By:   
/s/ Francis S. Hallinan  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff



7  
ALL THAT CERTAIN lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

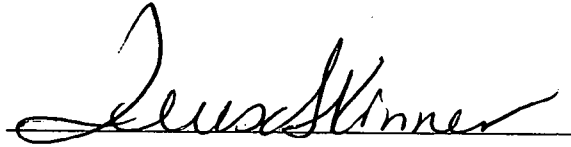
BEGINNING at a post on Ida Street at the Southeast corner of Lot No. 1127; thence along said Street two hundred and fifty-nine (259) feet to a post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No. 1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No. 1188 in the General Plan of the village of West Houtzdale; and having thereon erected a two story frame dwelling, house.

RPEMISES BEING: RR 1 BOX 10 IDA STREET

7

**VERIFICATION**

TERESA SKINNER hereby states that he/she is NORTHEAST REGIONAL MANAGER of CITIFINANCIAL MORTGAGE COMPANY, INC. mortgage servicing agent or Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "Teresa Skinner", is written over a horizontal line.

DATE: 01/01/04

FEDERMAN PHELAN, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

11-9-04 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.  
*William L. Phelan*  
Deputy Prothonotary

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 04-1280-CD

CLEARFIELD COUNTY

Plaintiff

v.

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

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

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

NOV 09 2004

Attest.

*William L. Phelan*  
Prothonotary/  
Clerk of Courts

Defendants

**CIVIL ACTION - LAW**  
**REINSTATED**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**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 this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record  
FEDERMAN AND PHELAN

7  
**IF THIS IS THE FIRST NOTICE THAT YOU HAVE  
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION  
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),  
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF  
THE DEBT OR ANY PORTION THEREOF. IF  
DEFENDANT(S) DO SO IN WRITING WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
OBTAIN AND PROVIDE DEFENDANT(S) WITH  
WRITTEN VERIFICATION THEREOF;  
OTHERWISE, THE DEBT WILL BE ASSUMED TO  
BE VALID. LIKEWISE, IF REQUESTED WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
SEND DEFENDANT(S) THE NAME AND ADDRESS  
OF THE ORIGINAL CREDITOR, IF DIFFERENT  
FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT  
UNTIL THE END OF THE THIRTY (30) DAY  
PERIOD FOLLOWING FIRST CONTACT WITH  
YOU BEFORE SUING YOU TO COLLECT THIS  
DEBT. EVEN THOUGH THE LAW PROVIDES  
THAT YOUR ANSWER TO THIS COMPLAINT IS  
TO BE FILED IN THIS ACTION WITHIN TWENTY  
(20) DAYS, YOU MAY OBTAIN AN EXTENSION OF  
THAT TIME. FURTHERMORE, NO REQUEST  
WILL BE MADE TO THE COURT FOR A  
JUDGMENT UNTIL THE EXPIRATION OF THIRTY  
(30) DAYS AFTER YOU HAVE RECEIVED THIS  
COMPLAINT. HOWEVER, IF YOU REQUEST  
PROOF OF THE DEBT OR THE NAME AND  
ADDRESS OF THE ORIGINAL CREDITOR WITHIN  
THE THIRTY (30) DAY PERIOD THAT BEGINS  
UPON YOUR RECEIPT OF THIS COMPLAINT,  
THE LAW REQUIRES US TO CEASE OUR  
EFFORTS (THROUGH LITIGATION OR  
OTHERWISE) TO COLLECT THE DEBT UNTIL  
WE MAIL THE REQUESTED INFORMATION TO  
YOU. YOU SHOULD CONSULT AN ATTORNEY  
FOR ADVICE CONCERNING YOUR RIGHTS AND  
OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND  
RECEIVED A DISCHARGE, THIS IS NOT AN  
ATTEMPT TO COLLECT A DEBT. IT IS AN  
ACTION TO ENFORCE A LIEN ON REAL ESTATE.**

1. Plaintiff is

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY,  
INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

2. The name(s) and last known address(es) of the Defendant(s) are:

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.


3. On 08/31/2000 RICHARD SEDGWICK and ANITA P. SEDGWICK made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200012947
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 02/06/2004 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$46,394.61
Interest	4,838.91
01/06/2004 through 11/03/2004 (Per Diem \$15.97)	
Attorney's Fees	1,250.00
Cumulative Late Charges	59.67
09/06/2000 to 11/03/2004	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 53,093.19
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
<b>TOTAL</b>	<b>\$ 53,093.19</b>

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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. Mortgagor ANITA P. SEDGWICK, died on 03/26/2002, and upon information and belief, her surviving heirs are RICHARD SEDGWICK and UNKNOWN PARTIES
10. Plaintiff contacted the Register of Wills of Clearfield County and was informed as of 11/03/2004, no estate has been raised on behalf of the decedent mortgagor.
11. Plaintiff hereby releases ANITA P. SEDGWICK, from liability for the debt secured by the mortgage.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 53,093.19, together with interest from 11/03/2004 at the rate of \$15.97 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN PHELAN, LLP  
By:   
/s/ Francis S. Hallinan  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

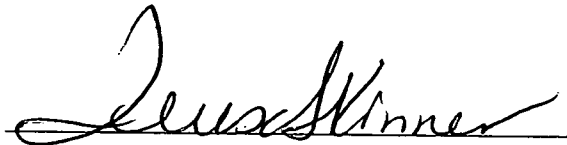
ALL THAT CERTAIN lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

BEGINNING at a post on Ida Street at the Southeast corner of Lot No. 1127; thence along said Street two hundred and fifty-nine (259) feet to a post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No. 1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No. 1188 in the General Plan of the village of West Houtzdale; and having thereon erected a two story frame dwelling, house.

RPEMISES BEING: RR 1 BOX 10 IDA STREET

**VERIFICATION**

TERESA SKINNER hereby states that he/she is NORTHEAST REGIONAL MANAGER of CITIFINANCIAL MORTGAGE COMPANY, INC. mortgage servicing agent or Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read "Teresa Skinner", written over a horizontal line.

DATE: 11/01/04



PHELAN HALLINAN & SCHMIEG LLP  
By: Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205  
One Penn Center Plaza, Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

CITIFINANCIAL MORTGAGE  
COMPANY, INC., F/K/A ASSOCIATES  
HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

Plaintiff

vs.

RICHARD R. SEDGWICK,  
INDIVIDUALLY AND HEIR OF ANITA P.  
SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS AND ALL PERSONS, FIRMS  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE OF INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED

Defendant(s)

ATTORNEY FOR PLAINTIFF

: COURT OF COMMON PLEAS

: CIVIL DIVISION

: CLEARFIELD COUNTY

: NO. 04-1280-CD

**FILED**

JAN 24 2005

m/2:16/621

William A. Shaw  
Prothonotary

**AFFIDAVIT OF SERVICE OF COMPLAINT  
BY MAIL PURSUANT TO COURT ORDER**

I hereby certify that a true and correct copy of the Civil Action Complaint in Mortgage Foreclosure in the above captioned matter was sent by regular and certified mail, return receipt requested, to the following persons, **UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE OF INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED** at **RR BOX 10 IDA STREET, CLEARFIELD, PA 16651** on **January 19, 2005**, in accordance with the Order of Court dated **DECEMBER 6, 2004**. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: January 19, 2005

  
FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100091  
NO: 04-1280-CD  
SERVICE # 1 OF 1  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIFINANCIAL MORTGAGE COMPANY INC.

vs.

DEFENDANT: RICHARD R. SEDGWICK, ind & heir of Anita P. Sedgwick, Deceased; Unknown Heirs, successors,  
assigns et al

SHERIFF RETURN

---

NOW, December 30, 2004 AT 10:46 AM POSTED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE AT  
RR#1 BOX 10 IDA ST., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA.

SERVED BY: DAVIS / MORGILLO

FILED

013128001  
FEB 01 2005

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100091  
NO: 04-1280-CD  
SERVICES 1  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIFINANCIAL MORTGAGE COMPANY INC.

vs.

DEFENDANT: RICHARD R. SEDGWICK, ind & heir of Anita P. Sedgwick, Deceased; Unknown Heirs, successors,  
assigns et al

SHERIFF RETURN


RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	FEDERMAN	394904	10.00
SHERIFF HAWKINS	FEDERMAN	394934	22.50

Sworn to Before Me This

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

So Answers,



Chester A. Hawkins  
Sheriff

FEDERMAN PHELAN, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 04-1280-CD

Plaintiff

v.

CLEARFIELD COUNTY

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

Defendants

**CIVIL ACTION - LAW**  
**REINSTATED**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**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 this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
David S. Meholic, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record  
FEDERMAN AND PHELAN

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE  
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION  
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),  
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF  
THE DEBT OR ANY PORTION THEREOF. IF  
DEFENDANT(S) DO SO IN WRITING WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
OBTAIN AND PROVIDE DEFENDANT(S) WITH  
WRITTEN VERIFICATION THEREOF;  
OTHERWISE, THE DEBT WILL BE ASSUMED TO  
BE VALID. LIKEWISE, IF REQUESTED WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS  
PLEADING, COUNSEL FOR PLAINTIFF WILL  
SEND DEFENDANT(S) THE NAME AND ADDRESS  
OF THE ORIGINAL CREDITOR, IF DIFFERENT  
FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT  
UNTIL THE END OF THE THIRTY (30) DAY  
PERIOD FOLLOWING FIRST CONTACT WITH  
YOU BEFORE SUING YOU TO COLLECT THIS  
DEBT. EVEN THOUGH THE LAW PROVIDES  
THAT YOUR ANSWER TO THIS COMPLAINT IS  
TO BE FILED IN THIS ACTION WITHIN TWENTY  
(20) DAYS, YOU MAY OBTAIN AN EXTENSION OF  
THAT TIME. FURTHERMORE, NO REQUEST  
WILL BE MADE TO THE COURT FOR A  
JUDGMENT UNTIL THE EXPIRATION OF THIRTY  
(30) DAYS AFTER YOU HAVE RECEIVED THIS  
COMPLAINT. HOWEVER, IF YOU REQUEST  
PROOF OF THE DEBT OR THE NAME AND  
ADDRESS OF THE ORIGINAL CREDITOR WITHIN  
THE THIRTY (30) DAY PERIOD THAT BEGINS  
UPON YOUR RECEIPT OF THIS COMPLAINT,  
THE LAW REQUIRES US TO CEASE OUR  
EFFORTS (THROUGH LITIGATION OR  
OTHERWISE) TO COLLECT THE DEBT UNTIL  
WE MAIL THE REQUESTED INFORMATION TO  
YOU. YOU SHOULD CONSULT AN ATTORNEY  
FOR ADVICE CONCERNING YOUR RIGHTS AND  
OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND  
RECEIVED A DISCHARGE, THIS IS NOT AN  
ATTEMPT TO COLLECT A DEBT. IT IS AN  
ACTION TO ENFORCE A LIEN ON REAL ESTATE.**

1. Plaintiff is

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY,  
INC.  
8333 RIDGE POINT DRIVE  
ATTN: AVCO UNIT  
IRVING, TX 75063

2. The name(s) and last known address(es) of the Defendant(s) are:

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS, AND ALL PERSONS, FIRMS,  
OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
RR1 BOX 10 IDA STREET  
CLEARFIELD, PA 16651

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.


3. On 08/31/2000 RICHARD SEDGWICK and ANITA P. SEDGWICK made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200012947
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 02/06/2004 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$46,394.61
Interest	4,838.91
01/06/2004 through 11/03/2004 (Per Diem \$15.97)	
Attorney's Fees	1,250.00
Cumulative Late Charges	59.67
09/06/2000 to 11/03/2004	
Cost of Suit and Title Search	\$ 550.00
Subtotal	\$ 53,093.19
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	\$ 0.00
<b>TOTAL</b>	<b>\$ 53,093.19</b>

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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. Mortgagor ANITA P. SEDGWICK, died on 03/26/2002, and upon information and belief, her surviving heirs are RICHARD SEDGWICK and UNKNOWN PARTIES
10. Plaintiff contacted the Register of Wills of Clearfield County and was informed as of 11/03/2004, no estate has been raised on behalf of the decedent mortgagor.
11. Plaintiff hereby releases ANITA P. SEDGWICK, from liability for the debt secured by the mortgage.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 53,093.19, together with interest from 11/03/2004 at the rate of \$15.97 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

FEDERMAN PHELAN, LLP  
By:   
    /s/Francis S. Hallinan  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

ALL THAT CERTAIN lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

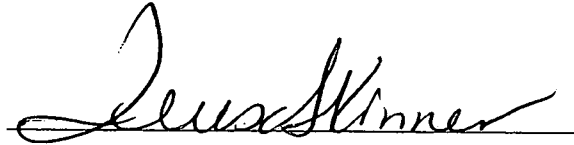
BEGINNING at a post on Ida Street at the Southeast corner of Lot No. 1127; thence along said Street two hundred and fifty-nine (259) feet to a post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No. 1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No. 1188 in the General Plan of the village of West Houtzdale; and having thereon erected a two story frame dwelling, house.

RPEMISES BEING: RR 1 BOX 10 IDA STREET



**VERIFICATION**

TERESA SKINNER hereby states that he/she is NORTHEAST REGIONAL MANAGER of CITIFINANCIAL MORTGAGE COMPANY, INC. mortgage servicing agent or Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "Teresa Skinner", written over a horizontal line.

DATE: \_\_\_\_\_

01/01/04

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CITIFINANCIAL MORTGAGE COMPANY, INC.  
F/K/A ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY, INC.  
8333 RIDGE POINT DRIVE, ATTN: AVCO UNIT  
IRVING, TX 75063

No.: 04-1280-CD

vs.

RICHARD R. SEDGWICK, INDIVIDUALLY AND  
HEIR OF ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND  
ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED  
RR 1 BOX 10 IDA STREET  
HOUTZDALE, PA 16651

**FILED** *Any pd. 30.00*  
*m/d: 10/21/04* *1cc @ notice to Defs*  
**MAR 03 2005**  
William A. Shaw *Statement to Atty*  
Prothonotary/Clerk of Courts

**PRAECIPE FOR IN REM JUDGMENT FOR FAILURE TO  
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE PROTHONOTARY:

Kindly enter an in rem judgment in favor of the Plaintiff and against RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED and UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE, OR INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED, Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$53,093.19
Interest (11/4/04 to 3/1/05)	<u>1,884.46</u>
<b>TOTAL</b>	<b>\$54,977.65</b>

I hereby certify that (1) the addresses of the Plaintiff and Defendant(s) are as shown above, and (2) that notice has been given in accordance with Rule 237.1, copy attached.

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

Damages are hereby assessed as indicated.

DATE: March 3, 2005

  
PRO PROTHY

KIO

PHELAN, HALLINAN AND SCHMIEG

By: Lawrence T. Phelan, Esq., Id. No. 32227

Francis S. Hallinan, Esq., Id. No. 62695

Daniel G. Schmieg, Esq., Id. No. 62205

One Penn Center Plaza, Suite 1400

Philadelphia, PA 19103

(215) 563-7000

CITIFINANCIAL MORTGAGE COMPANY, INC., : COURT OF COMMON PLEAS

F/K/A ASSOCIATES HOME EQUITY CONSUMER : CIVIL DIVISION

DISCOUNT COMPANY, INC.

Plaintiff

: CLEARFIELD COUNTY

Vs.

: NO. 04-1280-CD

RICHARD R. SEDGWICK, INDIVIDUALLY AND

HEIR OF ANITA P. SEDGWICK, DECEASED

UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND

ALL PERSONS, FIRMS, OR ASSOCIATIONS

CLAIMING RIGHT, TITLE, OR INTEREST FROM OR

UNDER ANITA P. SEDGWICK, DECEASED

Defendants

**FILE COPY**

**TO: RICHARD R. SEDGWICK  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830**

**DATE OF NOTICE: FEBRUARY 9, 2005**

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

#### **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 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.

CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT  
ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
(814) 765-2641 x 5982

PENNSYLVANIA LAWYER REFERRAL  
SERVICE  
PENNSYLVANIA BAR ASSOCIATION  
100 SOUTH STREET  
P.O. BOX 186  
HARRISBURG, PA 17108  
800-692-7375

FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

PHELAN, HALLINAN AND SCHMIEG  
By: Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205  
One Penn Center Plaza, Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., : COURT OF COMMON PLEAS  
F/K/A ASSOCIATES HOME EQUITY CONSUMER :  
DISCOUNT COMPANY, INC. : CIVIL DIVISION  
Plaintiff :  
: CLEARFIELD COUNTY

Vs.

: NO. 04-1280-CD

RICHARD R. SEDGWICK, INDIVIDUALLY AND  
HEIR OF ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND  
ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM OR  
UNDER ANITA P. SEDGWICK, DECEASED  
Defendants

FILE COPY

TO: UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED  
RR 1 BOX 10 IDA STREET  
HOUTZDALE, PA 16651

DATE OF NOTICE: **FEBRUARY 9, 2005**

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

#### 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 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.

CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT  
ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
(814) 765-2641 x 5982

PENNSYLVANIA LAWYER REFERRAL  
SERVICE  
PENNSYLVANIA BAR ASSOCIATION  
100 SOUTH STREET  
P.O. BOX 186  
HARRISBURG, PA 17108  
800-692-7375

FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

PHELAN, HALLINAN AND SCHMIEG  
By: Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205  
One Penn Center Plaza, Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL MORTGAGE COMPANY, INC., : COURT OF COMMON PLEAS  
F/K/A ASSOCIATES HOME EQUITY CONSUMER :  
DISCOUNT COMPANY, INC. : CIVIL DIVISION  
Plaintiff

: CLEARFIELD COUNTY

Vs.

: NO. 04-1280-CD

RICHARD R. SEDGWICK, INDIVIDUALLY AND  
HEIR OF ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND  
ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM OR  
UNDER ANITA P. SEDGWICK, DECEASED  
Defendants

**FILE COPY**

TO: RICHARD R. SEDGWICK  
RR 1 BOX 10 IDA STREET  
HOUTZDALE, PA 16651

DATE OF NOTICE: FEBRUARY 9, 2005

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

#### 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 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.

CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT  
ADMINISTRATOR

PENNSYLVANIA LAWYER REFERRAL  
SERVICE

CLEARFIELD COUNTY COURTHOUSE

PENNSYLVANIA BAR ASSOCIATION

CLEARFIELD, PA 16830

100 SOUTH STREET

(814) 765-2641 x 5982

P.O. BOX 186

HARRISBURG, PA 17108

800-692-7375

FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

PHILAN HALLINAN & SCHMIEG

By: DANIEL G. SCHMIEG, ESQUIRE

IDENTIFICATION NO. 62205

ONE PENN CENTER AT SUBURBAN STATION

1617 JOHN F. KENNEDY BLVD., SUITE 1400

PHILADELPHIA, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

CITIFINANCIAL MORTGAGE COMPANY, INC.  
F/K/A ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY, INC.

CLEARFIELD COUNTY

No.: 04-1280-CD

vs.

RICHARD R. SEDGWICK, INDIVIDUALLY AND  
HEIR OF ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND  
ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED

**VERIFICATION OF NON-MILITARY SERVICE**

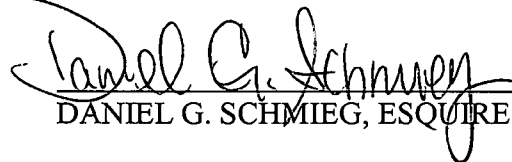
DANIEL G. SCHMIEG, ESQUIRE, hereby verifies that he is attorney for the Plaintiff in the above-captioned matter, and that on information and belief, he has knowledge of the following facts, to wit:

(a) that the defendant(s) is/are 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 Act of Congress of 1940, as amended.

(b) that defendant, RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED, is over 18 years of age, and resides at 307 EAST CHERRY STREET, CLEARFIELD, PA 16830 .

(c) that defendant, UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE, OR INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED, is over 18 years of age, and resides at RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651.

This statement is made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

  
DANIEL G. SCHMIEG, ESQUIRE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION - LAW

CITIFINANCIAL MORTGAGE COMPANY, INC.  
F/K/A ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY, INC.

Plaintiff

No.: 04-1280-CD

vs.

RICHARD R. SEDGWICK, INDIVIDUALLY AND  
HEIR OF ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND  
ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED

Defendant(s)

Notice is given that a Judgment in the above captioned matter has been entered  
against you on March 3, 2005.

By: Willie L. Hays DEPUTY

If you have any questions concerning this matter please contact:

Daniel G. Schmieg  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney or Party Filing  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

**\*\*THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND ANY  
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. IF YOU HAVE  
PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS IS NOT AND SHOULD  
NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY  
ENFORCEMENT OF A LIEN AGAINST PROPERTY.\*\***

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

COPY

Citifinancial Mortgage Company, Inc.  
Plaintiff(s)

No.: 2004-01280-CD

Real Debt: \$54,977.65

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Richard R. Sedgwick, indiv. and  
heir of Anita P. Sedgwick, Deceased;  
Unknown Heirs, Successors, Assigns  
and all Persons, Firms, or Assoc.  
claiming right, title or interest from or  
under Anita P. Sedgwick, Deceased  
Defendant(s)

Entry: \$20.00

Instrument: In Rem Judgment

Date of Entry: March 3, 2005

Expires: March 3, 2010

Certified from the record this 3rd day of March, 2005.

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

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

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

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



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

CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA

vs.

**No. 04-1280-CD**

RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF  
ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL  
PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER ANITA P.  
SEDGWICK, DECEASED

**PRAECIPE FOR WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

To the Director of the Office of the Prothonotary:

Issue writ of execution in the above matter:

Amount Due

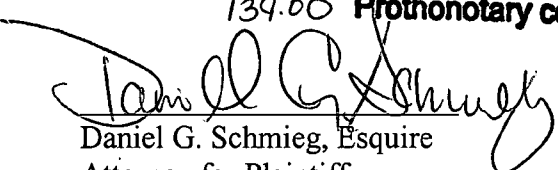
\$54,977.65

Interest from 3/1/05 to  
Date of Sale (\$9.04 per diem)

and Costs.

139.00

**Prothonotary costs**

  
Daniel G. Schmieg, Esquire  
Attorney for Plaintiff  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814

Note: Please attach description of Property.

KIO

**FILED** 1 CC & Lewyits w/  
m/r: 24/01 prop. desen to Shrf  
(sk) MAR 03 2005 4th pd. 20.00  
William A. Shaw  
Prothonotary/Clerk of Courts

No. 04-1280-CD

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

vs.

RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF  
ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL  
PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER ANITA P.  
SEDGWICK, DECEASED

William A. Shaw  
Prothonotary/Clerk of Courts

MAR 03 2005

FILED

PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)

*David G. Schrey*  
Attorney for Plaintiff(s)

Address: 307 EAST CHERRY STREET, CLEARFIELD, PA 16830  
RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651  
Where papers may be served.

CLEARFIELD COUNTY

CITIFINANCIAL MORTGAGE COMPANY,  
INC. F/K/A ASSOCIATES HOME EQUITY  
CONSUMER DISCOUNT COMPANY, INC.

No.: 04-1280-CD

vs.

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK,  
DECEASED  
UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS AND ALL PERSONS, FIRMS, OR  
ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED

**AFFIDAVIT PURSUANT TO RULE 3129  
(Affidavit No. 1)**

CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES HOME EQUITY  
CONSUMER DISCOUNT COMPANY, INC., Plaintiff in the above action, by its attorney, Daniel G. Schmieg,  
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 RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651:

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

Name

Last Known Address (if address cannot be  
reasonably ascertained, please indicate)

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK, DECEASED

307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

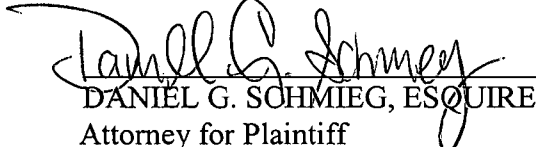
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS  
AND ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED

RR 1 BOX 10 IDA STREET  
HOUTZDALE, PA 16651

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

SAME AS ABOVE

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. Sec. 4904 relating to unsworn falsification to authorities.

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

February 28, 2005

CLEARFIELD COUNTY

CITIFINANCIAL MORTGAGE COMPANY, INC.  
F/K/A ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY, INC.

No.: 04-1280-CD

vs.

RICHARD R. SEDGWICK, INDIVIDUALLY AND  
HEIR OF ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND  
ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED

**AFFIDAVIT PURSUANT TO RULE 3129  
(Affidavit No. 2)**

CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES HOME EQUITY  
CONSUMER DISCOUNT COMPANY, INC., Plaintiff in the above action, by its attorney, Daniel G. Schmieg,  
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 RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651:

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

Name

Last Known Address (if address cannot be reasonably  
ascertained, please indicate)

FIRST NATIONAL BANK

4141 E. STATE STREET  
MERCER , PA 16148

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

Name

Last Known Address (if address cannot be reasonable  
ascertained, please indicate)

None.

5. Name and address of every other person who has any record lien on the property:

Name

Last Known Address (if address cannot be  
reasonable ascertained, please indicate)

None.

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

Name

Last Known Address (if address cannot be  
reasonably ascertained, please indicate)

Clearfield County Domestic Relations

Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830

COMMONWEALTH OF PA  
BUREAU OF INDIVIDUAL TAX  
INHERITANCE TAX DIVISION  
ATTN: JOHN MURPHY

6<sup>TH</sup> FLOOR, STRAWBERRY SQUARE  
DEPART. # 280601  
HARRISBURG, PA 17128

DEPARTMENT OF PUBLIC WELFARE  
TPL CASUALTY UNIT, ESTATE RECOVERY PROGRAM

P.O. BOX 8486  
WILLOW OAK BUILDING  
HARRISBURG, PA 17105-8486

INTERNAL REVENUE SERVICE  
FEDERATED INVESTORS TOWER

13<sup>TH</sup> FLOOR, SUITE 1300  
1001 LIBERTY AVENUE  
PITTSBURGH, PA 15222

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:

Name

Last Known Address (if address cannot be  
reasonably ascertained, please indicate)

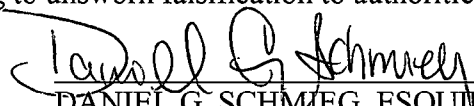
Commonwealth of Pennsylvania  
Department of Welfare

PO Box 2675  
Harrisburg, PA 17105

Tenant/Occupant

RR 1 BOX 10 IDA STREET  
HOUTZDALE, PA 16651

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. Sec. 4904 relating to unsworn falsification to authorities.

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

February 28, 2005

PHELAN HALLINAN & SCHMIEG  
By: DANIEL G. SCHMIEG, ESQUIRE  
ONE PENN CENTER AT  
SUBURBAN STATION  
1617 JOHN F. KENNEDY BOULEVARD  
SUITE 1400  
PHILADELPHIA, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF  
COURT OF COMMON PLEAS  
CIVIL DIVISION

CITIFINANCIAL MORTGAGE COMPANY, INC.  
F/K/A ASSOCIATES HOME EQUITY  
CONSUMER DISCOUNT COMPANY, INC.

No.: 04-1280-CD

vs.

CLEARFIELD COUNTY

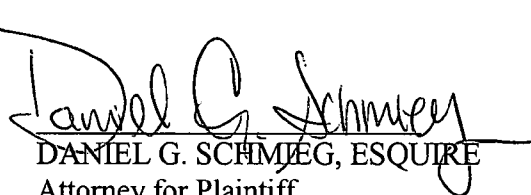
RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK,  
DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS  
AND ALL PERSONS, FIRMS, OR  
ASSOCIATIONS CLAIMING RIGHT, TITLE, OR  
INTEREST FROM OR UNDER ANITA P.  
SEDGWICK, DECEASED

CERTIFICATION

DANIEL G. SCHMIEG, ESQUIRE, hereby states that he is the attorney for the Plaintiff in the above captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

- ☐ an FHA Mortgage
- ☐ non-owner occupied
- ☐ vacant
- ☒ Act 91 procedures have been fulfilled

This certification is made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

WRIT OF EXECUTION -- (MORTGAGE FORECLOSURE)  
Pa.R.C.P. 3180 to 3183 and Rule 3257

COPY

CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA

vs.

NO.: 04-1280-CD

RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF  
ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL  
PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER ANITA P.  
SEDGWICK, DECEASED

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 (specifically described property below):

Premises: RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651

(See legal description attached.)

Amount Due	\$ <u>54,977.65</u>
Interest from 3/1/05 to Date of Sale (\$9.04 per diem)	\$ _____
Total	\$ _____ Plus costs as endorsed. 139.00 Prothonotary costs

Prothonotary, Common Pleas Court of  
Clearfield County, Pennsylvania

Dated 3/3/05  
(SEAL)

By:

Deputy

KIO

**IMPORTANT NOTICE:** This property is sold at the direction of the plaintiff. It may not be sold in the absence of a representative of the plaintiff at the Sheriff's Sale. The sale must be postponed or stayed in the event that a representative of the plaintiff is not present at the sale.

No. 04-1280-CD

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

CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES  
HOME EQUITY CONSUMER DISCOUNT COMPANY, INC.

vs.

RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P.  
SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE, OR INTEREST  
FROM OR UNDER ANITA P. SEDGWICK, DECEASED

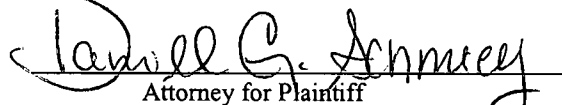
---

**WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

---

Real Debt	<u>\$54,977.65</u>
Int. from 3/1/05 to Date of Sale (\$9.04 per diem)	_____
Costs	_____
Prothy. Pd.	<u>139.00</u>
Sheriff	_____

also verified for

  
Attorney for Plaintiff

Address: 307 EAST CHERRY STREET, CLEARFIELD, PA 16830  
RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651  
Where papers may be served.

Daniel G. Schmieg, Esquire  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000



**DESCRIPTION**

ALL THAT CERTAIN lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

BEGINNING at a post on Ida Street at the Southeast corner of Lot No. 1127; thence along said Street two hundred and fifty-nine (259) feet to a post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No. 1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No. 1188 in the General Plan of the village of West Houtzdale; and having thereon erected a two story frame dwelling, house.

Tax Parcel #130-M14-396-44

**TITLE TO SAID PREMISES IS VESTED IN** Richard Sedgwick and Anita P. Sedgwick by Deed from Anita P. Sedgwick, dated 6/25/1999 and recorded 7/1/1999 in Instrument ID #199910993.

Premises: RR1 Box 10 IDA Street, Clearfield, PA 16651

PHELAN HALLINAN & SCHMIEG, LLP  
By: DANIEL SCHMIEG, ESQUIRE  
IDENTIFICATION NO. 12248  
ONE PENN CENTER AT SUBURBAN STATION,  
SUITE 1400  
PHILADELPHIA, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

CITIFINANCIAL MORTGAGE COMPANY, INC.  
F/K/A ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY, INC.

CLEARFIELD COUNTY

No.: 04-1280-CD

vs.

RICHARD R. SEDGWICK, INDIVIDUALLY AND  
HEIR OF ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND  
ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED

**FILED** *no cc*  
*m/10:01/01*  
JUL 05 2005 *@*

AFFIDAVIT

William A. Shaw  
Prothonotary/Clerk of Courts

I hereby certify that a true and correct copy of the Notice of Sheriff Sale in the above captioned matter was sent by regular mail and certified mail, return receipt requested, to **UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE, OR INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED** on 6/13/05 at **RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651**, in accordance with the Order of Court dated 12/6/05 I further certify that the mortgaged premises was posted by sheriff with the Notice of Sheriff's Sale on 6/18/05 CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY, INC., in accordance with the Court's Order.

The undersigned understands that this statement is made subject to the penalties of 18 PA C.S. s 4904 relating to unsworn falsification to authorities.

  
DANIEL G. SCHMIEG, ESQUIRE

Date: June 29, 2005

AFFIDAVIT OF SERVICE  
CLEARFIELD COUNTY

PLAINTIFF  
CITIFINANCIAL MORTGAGE COMPANY, INC.  
F/K/A ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY, INC.

ACCT. #2129296

DEFENDANT  
RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR  
OF ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND  
ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED

COURT NO.: 04-1280-CD

\*\*\* PLEASE POST WITH NOTICE OF SALE.\*\*\*  
RR 1 BOX 10 IDA STREET  
HOUTZDALE, PA 16651

TYPE OF ACTION  
XX Notice of Sheriff's Sale  
SALE DATE: JULY 1, 2005

SERVED

Served and made known to Richard R. Sedwick, Defendant on the 18<sup>th</sup> day of June, 2005, at 11:36 o'clock A. M.,  
at RR1 Box 10 Ida St Houtzdale, Commonwealth of Pennsylvania, in the manner described below:

- ☐ Defendant personally served.  
☐ Adult family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.  
☐ Adult in charge of Defendant's residence who refused to give name or relationship.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business.  
\_\_\_\_\_ an officer of said Defendant's company.  
☒ Other: Posted on front door in.

Description: Age \_\_\_\_\_ Height \_\_\_\_\_ Weight \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_ Other \_\_\_\_\_

I, Thomas Holmberg, a competent adult, being duly sworn according to law, depose and state that I personally POSTED a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed  
before me this 21<sup>st</sup> day  
of JUNE, 2005.

Notary:

By: Thomas Holmberg

Marilyn A. Campbell  
COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Marilyn A. Campbell, Notary Public  
City of Altoona, Blair County  
My Commission Expires Oct. 28, 2007  
Member, Pennsylvania Association of Notaries

NOT SERVED

On the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_, at \_\_\_\_\_ o'clock \_\_ M., Defendant NOT FOUND because:

☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant

Other:

Sworn to and subscribed  
before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 200\_\_.

By:

Notary:

ATTORNEY FOR PLAINTIFF  
DANIEL G. SCHMIEG, ESQUIRE  
I.D.#62205  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CITIFINANCIAL MORTGAGE COMPANY,  
INC., F/K/A ASSOCIATES HOME EQUITY  
CONSUMER DISCOUNT COMPANY, INC.

CIVIL DIVISION

Plaintiff

NO. 04-1280-CD

v.

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK,  
DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS,  
AND ALL PERSONS, FIRMS, OR  
ASSOCIATIONS CLAIMING RIGHT, TITLE, OR  
INTEREST FROM OR UNDER ANITA P.  
SEDGWICK, DECEASED

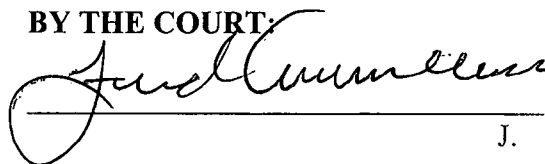
Defendants

ORDER

AND NOW, this 6<sup>th</sup> day of July, 2005, upon consideration of Plaintiff's Motion for Service of Notice of Sale Pursuant to Special Order of Court and the Affidavit of Good Faith Investigation attached thereto, it is hereby **ORDERED** that Plaintiff may obtain service of the Notice of Sale on the above-captioned Defendant, **RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED**, by mailing a true and correct copy of the Notice of Sale by certified mail and regular mail to RR#1 BOX 10 IDA STREET A/K/A 761 IDA STREET, HOUTZDALE, PA 16651 and 307 EAST CHERRY STREET, CLEARFIELD, PA 16830.

Service of the aforementioned mailings is effective upon the date of mailing and is to be done by Plaintiff's attorney, who will file with the Prothonotary's Office an Affidavit of service.

BY THE COURT:

  
J.

FILED  
9:41 AM  
JUL 07 2005  
William A. Shaw  
Prothonotary/Clerk of Courts  
Schmieg  
1 CC Shff  
@

PHELAN HALLINAN & SCHMIEG, LLP

BY: DANIEL G. SCHMIEG, ESQUIRE

Attorney I.D. No.: 62205

One Penn Center Plaza, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A ASSOCIATES

HOME EQUITY CONSUMER DISCOUNT COMPANY, INC.

Plaintiff

v.

RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P.

SEDGWICK, DECEASED

UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS,

FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE, OR

INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED

Defendants

Attorney for Plaintiff

CLEARFIELD COUNTY  
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 04-1280-CD

**MOTION FOR SERVICE OF NOTICE OF SALE  
PURSUANT TO SPECIAL ORDER OF COURT**

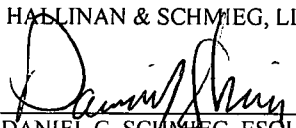
Plaintiff, by its counsel, Phelan Hallinan & Schmieg, LLP, petitions this Honorable Court for an Order directing service of the Notice of Sale upon the above-captioned Defendant, **RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED**, by certified mail and regular mail to RR#1 BOX 10 IDA STREET A/K/A 761 IDA STREET, HOUTZDALE, PA 16651 and 307 EAST CHERRY STREET, CLEARFIELD, PA 16830, and in support thereof avers the following:

1. A Sheriff's Sale of the mortgaged property involved herein has been scheduled for 7/1/05.
2. Pennsylvania Rule of Civil Procedure (Pa.R.C.P.) 3129.2 requires that the Defendants be served with a notification of Sheriff's Sale at least thirty (30) days prior to the scheduled sale date.
3. Attempts to serve Defendant with the Notice of Sale have been unsuccessful, as indicated by the Return of Service attached hereto as Exhibit "A".
4. Pursuant to Pa.R.C.P. 430, Plaintiff has made a good faith effort to locate the Defendant. An Affidavit of Reasonable Investigation setting forth the specific inquiries made and the results therefrom is attached hereto as Exhibit "B".

WHEREFORE, Plaintiff respectfully requests that the allowance of service of the Notice of Sale in accordance with Pa.R.C.P., Rule 430 by certified and regular mail to RR#1 BOX 10 IDA STREET A/K/A 761 IDA STREET, HOUTZDALE, PA 16651 and 307 EAST CHERRY STREET, CLEARFIELD, PA 16830.

PHELAN HALLINAN & SCHMIEG, LLP

By:

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

FILED

JUL 05 2005

William A. Shaw  
Prothonotary/Clerk of Courts

REAL ESTATE SALE

REAL ESTATE SALE - LEVY AND POST

EXECUTION SERVICE SHEET

DKT: EX PAGE: 20119

DEPUTY RECEIVED: May 09, 2005

DEFENDANT(S):  
 RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED UNKNOWN HEIRS,  
 SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE OR INTEREST  
 FROM OR UNDER ANITA P. SEDGWICK, DECEASED.

ADDRESS: RR #1, BOX 10 IDA STREET A/K/A 761 IDA STREET  
 HOUTZDALE, PA 16651

LEVY & POST AT: SAME AS ABOVE

SERVE AND LEAVE WITH: DEFENDANT POST GARNISHEE

WRIT OF EXECUTION NOTICE OF SALE TO POST / SERVE ~~WRIT LEVY~~

INTERROGATORIES TO GARNISHEE WRIT OF POSSESSION

MUST BE SERVED, POSTED OR LEVIED BY: 05/13/05

DATE SERVED, POSTED OR LEVIED: 5-13-05 TIME: 11:32 AM

NAME OF PERSON SERVED: Levied

TITLE: S.A.A.

WHERE SERVED / POSTED (ADDRESS): S.A.A.

DEFENDANT(S): RESIDENCE EMPLOYMENT

SIGNATURE OF PERSON SERVED: \_\_\_\_\_

DATE: \_\_\_\_\_

ATTEMPTS: House is empty - no one living  
at the above address

SPECIAL DIRECTIONS: RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK,  
 DECEASED

NO 04-1280-CD  
 RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED UNKNOWN HEIRS,  
 SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE OR INTEREST  
 FROM OR UNDER ANITA P. SEDGWICK, DECEASED

SERVED, POSTED OR LEVIED ON BY: Lewis-Marg. 16

NOTES: \_\_\_\_\_

REAL ESTATE

REAL ESTATE

EXECUTION SERVICE SHEET

DKT: EX PAGE: 20119

DEPUTY RECEIVED: May 09, 2005

DEFENDANT(S) RICHARD R. SEDGWICK INDIVIDUALLY AND HEIR OF

ADDRESS: 307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

LEVY & POST AT: SAME AS ABOVE

SERVE AND LEAVE WITH: DEFENDANT POST GARNISHEE

WRIT OF EXECUTION NOTICE OF SALE TO POST / SERVE WRIT LEVY

INTERROGATORIES TO GARNISHEE WRIT OF POSSESSION

MUST BE SERVED, POSTED OR LEVIED BY: 05/12/2005 11:32 AM

DATE SERVED, POSTED OR LEVIED: \_\_\_\_\_ TIME: \_\_\_\_\_

NAME OF PERSON SERVED: \_\_\_\_\_

TITLE: \_\_\_\_\_

WHERE SERVED /POSTED(ADDRESS): \_\_\_\_\_

DEFENDANT(S): RESIDENCE EMPLOYMENT

SIGNATURE OF PERSON SERVED: \_\_\_\_\_

DATE: \_\_\_\_\_

ATTEMPTS: 5-13-05- 1:32 PM W/H

*Det. doesn't live at the  
above address*

SPECIAL DIRECTIONS: RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK,  
DECEASED

NO 04-1280-CD  
RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED UNKNOWN HEIRS,  
SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE OR INTEREST  
FROM OR UNDER ANITA P. SEDGWICK, DECEASED

SERVED, POSTED OR LEVIED ON BY: Dennis Margill

NOTES: \_\_\_\_\_

**FORECLOSURE REVIEW SERVICES, INC.**  
**AFFIDAVIT OF GOOD FAITH INVESTIGATION**

File Number: 93100

Attorney Firm: **Phelan, Hallinan & Schmieg, LLP**

Subject: Richard R. Sedgwick and Anita P. Sedgwick (deceased)

Current Address: RR 1 Box 10 Ida Street, Houtzdale, PA 16651

Property Address: RR 1 Box 10 Ida Street, Houtzdale, PA 16651

Mailing Address: RR 1 Box 10 Ida Street, Houtzdale, PA 16651

**I, Brendan Booth, being duly sworn according to law, do hereby depose and state as follows, I have conducted an investigation into the whereabouts of the above-noted individual(s) and have discovered the following:**

**I. CREDIT INFORMATION**

**A. SOCIAL SECURITY NUMBER**

Our search verified the following information to be true and correct

Richard R. Sedgwick - 177-58-5979

Anita P. Sedgwick - 165-54-6042

**B. EMPLOYMENT SEARCH**

Richard R. Sedgwick - A review of the credit reporting agencies provided no employment information.

**C. INQUIRY OF CREDITORS**

Our inquiry of creditors indicated that Richard R. Sedgwick reside(s) at: RR 1 Box 10 Ida Street, Houtzdale, PA 16651.

**II. INQUIRY OF TELEPHONE COMPANY**

**A. DIRECTORY ASSISTANCE SEARCH**

On 6/13/05 our office contacted directory assistance, which indicated that Richard R. Sedgwick reside(s) at: 307 East Cherry Street, Clearfield, PA 16830. On 6/13/05 our office made a telephone call to the subject's phone number, (814) 762-8489, and received the following information: phone number disconnected.

**III. INQUIRY OF NEIGHBORS**

Using our White Pages data base our office was unable to locate any neighbors of RR 1 Box 10 Ida Street, Houtzdale, PA 16651.

On 6/13/05, 6/14/05 and 6/15/05 our office attempted to contact Charles Ross, (814) 765-8888, at 313 East Cherry Street, Clearfield, PA 16830: received an answering machine on all three occasions.

On 6/15/05 our office attempted to contact Helen Martell, (814) 765-5639, at 228 East Cherry Street, Clearfield, PA 16830: spoke to an unidentified female who could not confirm or deny that Richard R. Sedgwick reside(s) at: 307 East Cherry Street, Clearfield, PA 16830.

Using our White Pages data base our office was unable to locate any additional neighbors of 307 East Cherry Street, Clearfield, PA 16830.



IV. ADDRESS INQUIRY

A. NATIONAL ADDRESS UPDATE

On 6/16/05 we reviewed the National Address database and found the following information: Richard R. Sedgwick- RR 1 Box 10 Ida Street, Houtzdale, PA 16651.

B. ADDITIONAL ACTIVE MAILING ADDRESSES

Per our inquiry of creditors, the following is a possible mailing address: 307 East Cherry Street, Clearfield, PA 16830.

V. DRIVERS LICENSE INFORMATION

A. MOTOR VEHICLE & DMV OFFICE

Per the PA Department of Motor Vehicles, we were unable to obtain address information on Richard R. Sedgwick.

VI. OTHER INQUIRIES

A. DEATH RECORDS

As of 6/16/05 Vital Records and all public databases have a death record on file for Anita P. Sedgwick and no death record on file for Richard R. Sedgwick.

B. COUNTY VOTER REGISTRATION

The county voter registration was unable to confirm a registration for Richard R. Sedgwick residing at: last registered address.

VII. ADDITIONAL INFORMATION OF SUBJECT

A. DATE OF BIRTH

Richard R. Sedgwick - 9/1962

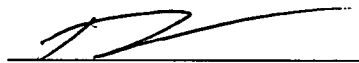
Anita P. Sedgwick - 1/1923 DOD - 3/02

**\* All accessible public databases have been checked and cross-referenced for the above named individual(s).**

**\* Please be advised all database information indicates the subject resides at the current address.**

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing states made by me are willfully false, I am subject to punishment.

I herby verify that the statements made herein are true and correct to the best of my knowledge, information and belief and that this affidavit of investigation is made subject to the penalties of 18 Pa C.S. Sec. 4904 relating to unsworn falsification to authorities.



AFFIANT - Brendan Booth  
Foreclosure Review Services, Inc.

Sworn to and subscribed before me this 16<sup>th</sup> day of June 2005.

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

RYAN P. GALVIN, Notary Public  
City of Philadelphia, Phila. County

My Commission Expires December 21, 2008

The above information is obtained from available public records  
and we are only liable for the cost of the affidavit.

JEM

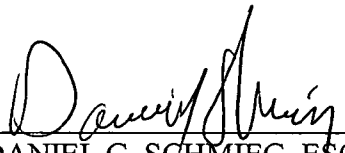


### VERIFICATION

DANIEL G. SCHMIEG, ESQUIRE, hereby states that he is the attorney for the Plaintiff in this action, that he is authorized to take the verification and that the statements made in the foregoing Motion for Service of Notice of Sale pursuant to Special Order of Court are true and correct to the best of his knowledge, information and belief.

The undersigned also understands that this statement herein is made subject to the penalties of 18 Pa. Sec. 4904 relating to unsworn falsification to authorities.

Date: June 21, 2005

  
\_\_\_\_\_  
DANIEL G. SCHMIEG, ESQUIRE

**PHELAN HALLINAN & SCHMIEG, LLP**  
**BY: DANIEL G. SCHMIEG, ESQUIRE**  
**Attorney I.D. No.: 62205**  
**One Penn Center Plaza, Suite 1400**  
**Philadelphia, PA 19103-1814**  
**(215) 563-7000**

**Attorney for Plaintiff**

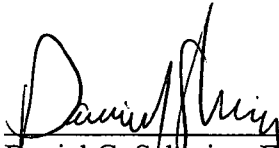
CITIFINANCIAL MORTGAGE COMPANY, INC.,	:	
F/K/A ASSOCIATES HOME EQUITY CONSUMER	:	CLEARFIELD COUNTY
DISCOUNT COMPANY, INC.	:	COURT OF COMMON PLEAS
	:	
Plaintiff	:	
	:	
v.	:	CIVIL DIVISION
	:	
RICHARD R. SEDGWICK, INDIVIDUALLY AND	:	
HEIR OF ANITA P. SEDGWICK, DECEASED	:	NO. 04-1280-CD
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS,	:	
AND ALL PERSONS, FIRMS, OR ASSOCIATIONS	:	
CLAIMING RIGHT, TITLE, OR INTEREST FROM	:	
OR UNDER ANITA P. SEDGWICK, DECEASED	:	
	:	
	:	
Defendants	:	

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion for Service of Notice of Sale Pursuant to Special Order of Court, Proposed Order, Memorandum of Law, Certification of Service and Verification in the above captioned matter was sent by first class mail, postage prepaid to the following interested parties on the date indicated below.

**RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK,  
DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS, OR  
ASSOCIATIONS CLAIMING RIGHT, TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED**

**RR#1 BOX 10 IDA STREET A/K/A 761 IDA STREET  
HOUTZDALE, PA 16651  
and  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830**

  
\_\_\_\_\_  
Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Date: June 21, 2005

**Phelan Hallinan & Schmieg, LLP**

Suite 1400

One Penn Center Plaza

Philadelphia, PA 19103-1814

Phone (215) 563-7000

Fax (215) 563-5534

Martin Tray  
Ext. 1563

Representing Lenders in  
Pennsylvania and New Jersey

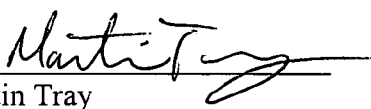
RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK,  
DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS, OR  
ASSOCIATIONS CLAIMING RIGHT, TITLE, OR INTEREST FROM OR UNDER ANITA P.  
SEDGWICK, DECEASED  
RR#1 BOX 10 IDA STREET A/K/A 761 IDA STREET  
HOUTZDALE, PA 16651  
and  
307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

Re: CITIFINANCIAL MORTGAGE COMPANY, INC., F/K/A ASSOCIATES HOME  
EQUITY CONSUMER DISCOUNT COMPANY, INC. vs. RICHARD R. SEDGWICK,  
INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED and  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS, OR  
ASSOCIATIONS CLAIMING RIGHT, TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED  
No. 04-1280-CD  
Premises: RR#1 BOX 10 IDA STREET A/K/A 761 IDA STREET, HOUTZDALE, PA  
16651

Dear Sir/Madam:

Enclosed please find Plaintiff's Motion for Service of Notice of Sale Pursuant to Special  
Order of Court and proposed Order.

Very truly yours,

By:   
Martin Tray

**FILED**

**JUL 05 2005**

William A. Shaw  
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP  
By: DANIEL SCHMIEG, ESQUIRE  
IDENTIFICATION NO. 12248  
ONE PENN CENTER AT SUBURBAN STATION,  
SUITE 1400  
PHILADELPHIA, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

CITIFINANCIAL MORTGAGE COMPANY, CLEARFIELD COUNTY  
INC. F/K/A ASSOCIATES HOME EQUITY  
CONSUMER DISCOUNT COMPANY, INC. No.: 04-1280-CD

vs.

RICHARD R. SEDWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK,  
DECEASED  
UNKNOWN HEIRS, SUCCESSORS,  
ASSIGNS AND ALL PERSONS, FIRMS, OR  
ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER  
ANITA P. SEDGWICK, DECEASED

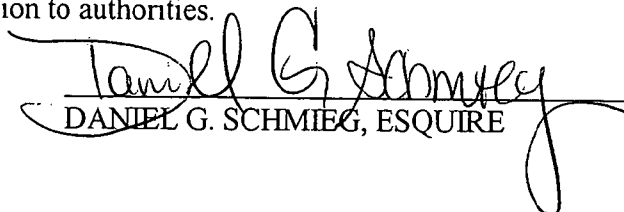
**FILED**

AUG 11 2005  
m 11:05 (w) @  
William A. Shaw  
Prothonotary/Clerk of Courts  
No C/C

AFFIDAVIT

I hereby certify that a true and correct copy of the Notice of Sheriff Sale in the above captioned matter was sent by regular mail and certified mail, return receipt requested, to **RICHARD R. SEDWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED** on 8/5/05 at **RR 1 BOX 10 IDA A/K/A 761 IDA STREET, STREET, HOUTZDALE, PA 16651** and **307 EAST CHERRY STREET, CLEARFIELD, PA 16830** in accordance with the Order of Court dated 7/6/05 .

The undersigned understands that this statement is made subject to the penalties of 18 PA C.S. s 4904 relating to unsworn falsification to authorities.

  
DANIEL G. SCHMIEG, ESQUIRE

Date: August 9, 2005

PHELAN HALLINAN & SCHMIEG, LLP  
By: DANIEL SCHMIEG, ESQUIRE  
IDENTIFICATION NO. 12248  
ONE PENN CENTER AT SUBURBAN STATION,  
SUITE 1400  
PHILADELPHIA, PA 19103-1814  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION

CITIFINANCIAL MORTGAGE COMPANY,  
INC. F/K/A ASSOCIATES HOME EQUITY  
CONSUMER DISCOUNT COMPANY, INC.

CLEARFIELD COUNTY

No.: 04-1280-CD

vs.

RICHARD R. SEDWICK, INDIVIDUALLY AND  
HEIR OF ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS  
AND ALL PERSONS, FIRMS, OR  
ASSOCIATIONS CLAIMING RIGHT, TITLE,  
OR INTEREST FROM OR UNDER ANITA P.  
SEDGWICK, DECEASED

AFFIDAVIT

I hereby certify that a true and correct copy of the Notice of Sheriff Sale in the above captioned matter was sent by regular mail and certified mail, return receipt requested, to **UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE, OR INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED** on 7/13/05 at **RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651**, in accordance with the Order of Court dated 12/06/04 I further certify that the mortgaged premises was posted by sheriff with the Notice of Sheriff's Sale on 6/18/05 in accordance with the Court's Order.

The undersigned understands that this statement is made subject to the penalties of 18 PA C.S. s 4904 relating to unsworn falsification to authorities.

  
DANIEL G. SCHMIEG, ESQUIRE

Date: August 9, 2005

AFFIDAVIT OF SERVICE  
CLEARFIELD COUNTY

PLAINTIFF  
CITIFINANCIAL MORTGAGE COMPANY, INC.  
F/K/A ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY, INC.

ACCT. #2129296

DEFENDANT  
RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR  
OF ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND  
ALL PERSONS, FIRMS, OR ASSOCIATIONS  
CLAIMING RIGHT, TITLE, OR INTEREST FROM  
OR UNDER ANITA P. SEDGWICK, DECEASED

COURT NO.: 04-1280-CD

\*\*\* PLEASE POST WITH NOTICE OF SALE. \*\*\*  
RR 1 BOX 10 IDA STREET  
HOUTZDALE, PA 16651

TYPE OF ACTION  
XX Notice of Sheriff's Sale  
SALE DATE: JULY 1, 2005

SERVED

Served and made known to Richard R. Sedwick, Defendant on the 18<sup>th</sup> day of June, 2005, at 11:36 o'clock A. M.,  
at RR1 Box 10 Ida St Houtzdale, Commonwealth of Pennsylvania, in the manner described below:

- ☐ Defendant personally served.  
☐ Adult family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.  
☐ Adult in charge of Defendant's residence who refused to give name or relationship.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business.  
\_\_\_\_\_ an officer of said Defendant's company.  
☒ Other: Posted on front door

Description: Age \_\_\_\_\_ Height \_\_\_\_\_ Weight \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_ Other \_\_\_\_\_

I, Thomas Holmberg, a competent adult, being duly sworn according to law, depose and state that I personally **POSTED** a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed  
before me this 21<sup>st</sup> day  
of JUNE, 2005.

Notary:

By:

Thomas Holmberg

Marilyn A. Campbell  
COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Marilyn A. Campbell, Notary Public  
City of Altoona, Blair County  
My Commission Expires Oct. 28, 2007  
Member, Pennsylvania Association of Notaries

NOT SERVED

On the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_ M., Defendant NOT FOUND because:

☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant

Other:

Sworn to and subscribed  
before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 200\_\_\_\_.

By:

Notary:

ATTORNEY FOR PLAINTIFF  
DANIEL G. SCHMIEG, ESQUIRE  
I.D.#62205  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20119  
NO: 04-1280-CD

PLAINTIFF: CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY, INC.

vs.

DEFENDANT: RICHARD R. SEDGWICK, IND. AND HEIR OF ANITA P. SEDGWICK, DECEASED UNKNOWN HEIRS,  
SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS, OR ASSOC. CLAIMING RIGHT, TITLE OR INTEREST ET AL

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 03/03/2005

LEVY TAKEN 05/13/2005 @ 11:32 AM

POSTED 05/13/2005 @ 11:32 AM

SALE HELD 10/07/2005

SOLD TO CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY, INC.

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 11/08/2005

DATE DEED FILED 11/08/2005

PROPERTY ADDRESS RR #1, BOX 10 IDA STREET A/K/A 761 IDA STREET HOUTZDALE , PA 16651

FILED

012:18 BNL  
NOV 08 2005

William A. Shaw  
Prothonotary/Clerk of Courts

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

DOCKET # 20119  
NO: 04-1280-CD

PLAINTIFF: CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES HOME EQUITY CONSUMER  
DISCOUNT COMPANY, INC.

vs.

DEFENDANT: RICHARD R. SEDGWICK, IND. AND HEIR OF ANITA P. SEDGWICK, DECEASED UNKNOWN HEIRS,  
SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS, OR ASSOC. CLAIMING RIGHT, TITLE OR INTEREST ET AL

**SHERIFF RETURN**

**SERVICES**

07/12/2005 @ SERVED RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF  
SERVED, RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED, BY CERT. AND REG. MAIL PER COURT  
ORDER. CERT. #70033110000193800787 RETURNED TO SHERIFF'S OFFICE UNCLAIMED AUGUST 5, 2005

05/24/2005 @ SERVED UNKNOWN HEIRS, SUCCESSORS, ASSIGNS  
SERVED, UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE OR  
INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED BY CERT MAIL TO ABOVE RESIDENCE RETURNED UNCLAIMED 6/13/05  
CERT#70041350000496726082

07/12/2005 @ SERVED RICHARD R. SEDGWICK, IND & HEIR OF  
SERVED RICHARD R. SEDGWICK IND & HEIR OF ANITA P. SEDGWICK, DEFENDANT, BY REG. AND CERT MAIL PER COURT ORDER..  
RECEIVED REGULAR MAIL BACK UNCLAIMED 7/18/05 RECEIVED CERT MAIL CERT #70033110000193800770 UNCLAIMED JULY 18, 2005.

@ SERVED  
NOW, JUNE 30, 2005 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO CONTINUE THE SHERIFF'S SALE SCHEDULED  
FOR JULY 1, 2005 TO AUGUST 5, 2005.

@ SERVED  
NOW, JULY 28, 2005 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO CONTINUE THE SHERIFF'S SALE SCHEDULED FOR  
AUGUST 5, 2005 TO OCTOBER 7, 2005

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20119

NO: 04-1280-CD

PLAINTIFF: CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY, INC.

vs.

DEFENDANT: RICHARD R. SEDGWICK, IND.AND HEIR OF ANITA P. SEDGWICK, DECEASED UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL PERSONS, FIRMS, OR ASSOC. CLAIMING RIGHT, TITLE OR INTEREST ET AL

Execution REAL ESTATE

SHERIFF RETURN

---

SHERIFF HAWKINS \$273.51


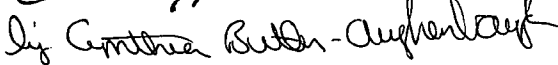
SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This

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

\_\_\_\_\_

So Answers,

  
  
Chester A. Hawkins  
Sheriff

**WRIT OF EXECUTION -- (MORTGAGE FORECLOSURE)**  
**Pa.R.C.P. 3180 to 3183 and Rule 3257**

CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A  
ASSOCIATES HOME EQUITY CONSUMER DISCOUNT  
COMPANY, INC.

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY,  
PENNSYLVANIA

vs.

NO.: 04-1280-CD

RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF  
ANITA P. SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL  
PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE, OR INTEREST FROM OR UNDER ANITA P.  
SEDGWICK, DECEASED

**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 (specifically described property below):**

Premises: **RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651**

(See legal description attached.)

Amount Due

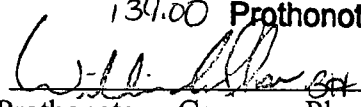
\$54,977.65

Interest from 3/1/05 to  
Date of Sale (\$9.04 per diem)

\$ \_\_\_\_\_

Total

\$ \_\_\_\_\_ Plus costs as endorsed.

139.00 Prothonotary costs  
  
Prothonotary, Common Pleas Court of  
Clearfield County, Pennsylvania

Dated 3/31/05  
(SEAL)

By:

Deputy

KIO

**IMPORTANT NOTICE: This property is sold at the direction of the plaintiff. It may not be sold in the absence of a representative of the plaintiff at the Sheriff's Sale. The sale must be postponed or stayed in the event that a representative of the plaintiff is not present at the sale.**

Received March 3, 2005 @ 3:45 P.M.

Chester A. Hawkins

Sgt. Cynthia Butler-Cleghen

No. 04-1280-CD

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

CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES  
HOME EQUITY CONSUMER DISCOUNT COMPANY, INC.

vs.

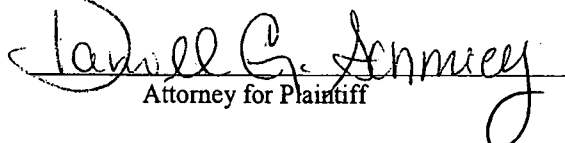
RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P.  
SEDGWICK, DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL PERSONS,  
FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE, OR INTEREST  
FROM OR UNDER ANITA P. SEDGWICK, DECEASED

---

**WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

---

Real Debt	<u>\$54,977.65</u>
Int. from 3/1/05 to Date of Sale (\$9.04 per diem)	<u>                    </u>
Costs	<u>                    </u>
Prothy. Pd.	<u>139.00</u>
Sheriff	<u>                    </u>

  
Attorney for Plaintiff

Address: 307 EAST CHERRY STREET, CLEARFIELD, PA 16830  
RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651  
Where papers may be served.

Daniel G. Schmieg, Esquire  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

**DESCRIPTION**

ALL THAT CERTAIN lot or piece of ground, situate in the Village of West Houtzdale, Woodward Township, Clearfield County, State of Pennsylvania, known and described as follows:

BEGINNING at a post on Ida Street at the Southeast corner of Lot No. 1127; thence along said Street two hundred and fifty-nine (259) feet to a post at the intersection of Hannah and Ida Streets; thence fifty-one (51) feet to a post; thence North 28 degrees East thirty-five (35) feet to a post; thence North 35 degrees, 45 minutes West three hundred thirty-six (336) feet to a post on the East line of Lot No. 1187; thence along said lot one hundred and forty-seven (147) feet to a post on Ida Street, the place of beginning and known as the South one-half of Lot No. 1188 in the General Plan of the village of West Houtzdale; and having thereon erected a two story frame dwelling, house.

Tax Parcel #130-M14-396-44

TITLE TO SAID PREMISES IS VESTED IN Richard Sedgwick and Anita P. Sedgwick by Deed from Anita P. Sedgwick, dated 6/25/1999 and recorded 7/1/1999 in Instrument ID #199910993.

Premises: RR1 Box 10 IDA Street, Clearfield, PA 16651

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF

NO. 04-1280-CD

NOW, November 08, 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 October 07, 2005, I exposed the within described real estate of Richard R. Sedgwick, Individually And Heir Of Anita P. Sedgwick, Deceased Unknown Heirs, Successors, Assigns And All Persons, Firms, Or Associatioins Claiming Right, Title Or Interest From Or Under Anita P. Sedgwick, Deceased to public venue or outcry at which time and place I sold the same to CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES HOME EQUITY CONSUMER DISCOUNT COMPANY, 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	2.00
LEVY	15.00
MILEAGE	14.58
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	20.93
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	40.00
MISCELLANEOUS	
<b>TOTAL SHERIFF COSTS</b>	<b>\$273.51</b>

**DEED COSTS:**

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	29.00
TRANSFER TAX 2%	0.00
<b>TOTAL DEED COSTS</b>	<b>\$29.00</b>

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	54,977.65
INTEREST @ 9.0400 %	1,988.80
FROM 03/01/2005 TO 10/07/2005	
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>\$57,006.45</b>

**COSTS:**

ADVERTISING	671.24
TAXES - COLLECTOR	453.14
TAXES - TAX CLAIM	498.71
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	29.00
SHERIFF COSTS	273.51
LEGAL JOURNAL COSTS	360.00
PROTHONOTARY	139.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
<b>TOTAL COSTS</b>	<b>\$2,569.60</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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CITIFINANCIAL MORTGAGE COMPANY,  
INC., F/K/A ASSOCIATES HOME EQUITY  
CONSUMER DISCOUNT COMPANY, INC.

CIVIL DIVISION

Plaintiff

NO. 04-1280-CD

v.

RICHARD R. SEDGWICK, INDIVIDUALLY  
AND HEIR OF ANITA P. SEDGWICK,  
DECEASED  
UNKNOWN HEIRS, SUCCESSORS, ASSIGNS,  
AND ALL PERSONS, FIRMS, OR  
ASSOCIATIONS CLAIMING RIGHT, TITLE, OR  
INTEREST FROM OR UNDER ANITA P.  
SEDGWICK, DECEASED

Defendants

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

JUL 07 2005

Attest.

*William L. Ammerman*  
Prothonotary/  
Clerk of Courts

**ORDER**

AND NOW, this 6<sup>th</sup> day of July, 2005, upon consideration of Plaintiff's Motion for Service of Notice of Sale Pursuant to Special Order of Court and the Affidavit of Good Faith Investigation attached thereto, it is hereby **ORDERED** that Plaintiff may obtain service of the Notice of Sale on the above-captioned Defendant, **RICHARD R. SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK, DECEASED**, by mailing a true and correct copy of the Notice of Sale by certified mail and regular mail to RR#1 BOX 10 IDA STREET A/K/A 761 IDA STREET, HOUTZDALE, PA 16651 and 307 EAST CHERRY STREET, CLEARFIELD, PA 16830.

Service of the aforementioned mailings is effective upon the date of mailing and is to be done by Plaintiff's attorney, who will file with the Prothonotary's Office an Affidavit of service.

**BY THE COURT:**

/s/ Fredric J. Ammerman

J.



Federman and Phelan is now  
Law Offices

**PHELAN HALLINAN & SCHMIEG, LLP**

One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814  
[Sandra.Cooper@fedphe.com](mailto:Sandra.Cooper@fedphe.com)

Sandra Cooper  
Judgment Department, Ext. 1258

Representing Lenders in  
Pennsylvania and New Jersey

June 30, 2005

Office of the Sheriff  
Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830

ATTENTION: CINDY (814) 765-5915

Re: CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES  
HOME EQUITY CONSUMER DISCOUNT COMPANY, INC. v. RICHARD R.  
SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK,  
DECEASED UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL  
PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE, OR  
INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED  
No. 04-1280-CD  
RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651

Dear Cindy:

Please postpone the Sheriff's Sale of the above referenced property which  
is scheduled for July 1, 2005.

The property is to be relisted for the 8/5/05 Sheriff's Sale.  
Very truly yours,  
SMC  
Sandra Coouer

Law Offices

**PHELAN HALLINAN & SCHMIEG, LLP**

One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814

Sandra Cooper  
Judgment Department, Ext. 1258

Representing Lenders in  
Pennsylvania and New Jersey

July 28, 2005

Office of the Sheriff  
Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830

ATTENTION: CINDY (814) 765-5915

**Re: CITIFINANCIAL MORTGAGE COMPANY, INC. F/K/A ASSOCIATES  
HOME EQUITY CONSUMER DISCOUNT COMPANY, INC. v. RICHARD R.  
SEDGWICK, INDIVIDUALLY AND HEIR OF ANITA P. SEDGWICK,  
DECEASED UNKNOWN HEIRS, SUCCESSORS, ASSIGNS AND ALL  
PERSONS, FIRMS, OR ASSOCIATIONS CLAIMING RIGHT, TITLE, OR  
INTEREST FROM OR UNDER ANITA P. SEDGWICK, DECEASED  
No. 04-1280-CD  
RR 1 BOX 10 IDA STREET, HOUTZDALE, PA 16651**

Dear Cindy:

Please postpone the Sheriff's Sale of the above referenced property which  
is scheduled for 8/5/05.

The property is to be relisted for the 10/7/05 Sheriff's Sale.

Very truly yours,  
SMC  
Sandra Coover

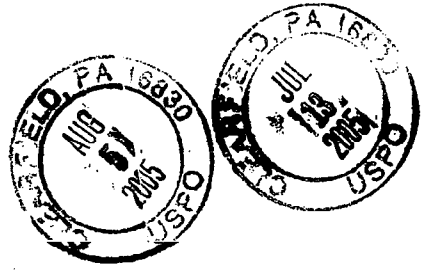
CERTIFIED MAIL

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>1. Article Addressed to:</p> <p>RICHARD R. SEDGWICK, IND. &amp; HEIR OF ANITA P. SEDGWICK, DECEASED 307 EAST CHERRY STREET CLEARFIELD, PA 16830</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input checked="" type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>PO Box 429 Milesburg PA 16853-0429</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7003 3110 0001 9380 0787</p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

102595-02-M-1540

Domestic Return Receipt

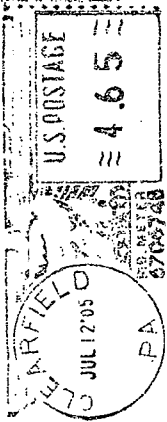




CHESTER A. HAWKINS  
SHERIFF  
COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830



7003 3110 0001 9380 0787



Rec'd  
PWS

*FWD*  
RICHARD R. SEDGWICK, IND. & HEIR OF

P.O. Box 479

A ☐ INSUFFICIENT ADDRESS  
C ☐ ATTEMPTED NOT KNOWN  
S ☐ NO SUCH NUMBER/STREET  
OTHER ☒ NOT DELIVERABLE AS ADDRESSED  
- UNABLE TO FORWARD

Milesbury

7/15  
7/20

**RTS**  
RETURN TO SENDER

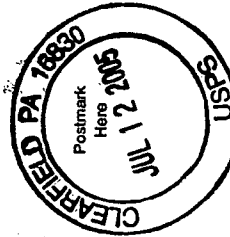
*Delivered*

U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage \$	
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$4.65



Sent To  
Street, Apt. No.,  
or PO Box No. RICHARD R. SEDGWICK, IND. & HEIR OF  
ANITA P. SEDGWICK, DECEASED  
City, State, Zip+4 307 EAST CHERRY STREET  
CLEARFIELD, PA 16830

PS Form 3800, June 2002 See Reverse for Instructions

7003 3110 0001 9380 0787



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

RICHARD R. SEDGWICK, IND. & HEIR OF  
ANITA P. SEDGWICK, DECEASED  
RR #1, BOX 10 IDA ST. A/K/A 761 IDA STREET  
HOUTZDALE, PA 16651

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

**X**

☐ Agent

☐ Addressee

**B. Received by (Printed Name)**

**C. Date of Delivery**

**D. Is delivery address different from item 1?**

If YES, enter delivery address below:

☐ Yes  
☐ No

**3. Service Type**

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

**4. Restricted Delivery? (Extra Fee)**

☐ Yes

**2. Article Number**

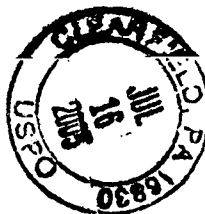
(Transfer from service label)

7003 3110 0001 9380 0770

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540





CHESTER A. HAWKINS  
SHERIFF  
COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830



7003 3110 0001 9380 0770



- ☒ Not Deliverable As Addressed  
☐ Unable To Forward  
☐ Insufficient Address  
☐ Moved, Left No Address  
☐ Unclaimed  
☐ Attempted-Not Refused  
☐ No Such Street/Not Known  
☐ Vacant  
☐ No Mail Receiptable  
☐ Return to Sender-Not Order  
☐ Return to Post Office  
☐ Return to Better Address

**DOE**  
RICHARD R. SEDGWICK, IND. & HEIR OF  
ANITA P. SEDGWICK, DECEASED  
RR #1, BOX 10 IDA ST. A/K/A 761 IDA ST.  
HOUTZDALE, PA 16651

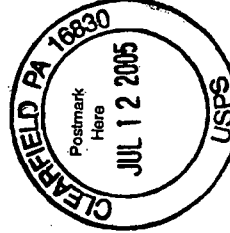
16830-2438 02

U.S. Postal Service<sup>TM</sup>  
**CERTIFIED MAIL<sup>TM</sup> RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.65



Sent To  
RICHARD R. SEDGWICK, IND. & HEIR OF  
ANITA P. SEDGWICK, DECEASED  
RR #1, BOX 10 IDA ST. A/K/A 761 IDA STREET  
City, State, ZIP+4  
HOUTZDALE, PA 16651

7003 3110 0001 9380 0770

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE.

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE OR INTEREST FROM OR UNDER AINTA P. SEDGWICK (DECEASED)  
RR 1, BOX 100A STREET  
HOUTSDALE, ALABAMA 36651

**COMPLETE THIS SECTION ON DELIVERY**

- A. Signature**  
**X**
- ☐ Agent  
☐ Addressee

- |   |                     |
|---|---------------------|
| B. Received by ( <i>Printed Name</i> )  | C. Date of Delivery |
| D. Is delivery address different from item 1? <input type="checkbox"/> Yes<br>If YES, enter delivery address below: <input type="checkbox"/> No |                     |

3. Service Type
- |   |   |
|---|---|
| <input type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail                   |
| <input type="checkbox"/> Registered     | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail   | <input type="checkbox"/> C.O.D.                         |

4. Restricted Delivery? (Extra Fee) ☐ Yes

## 2. Article Number

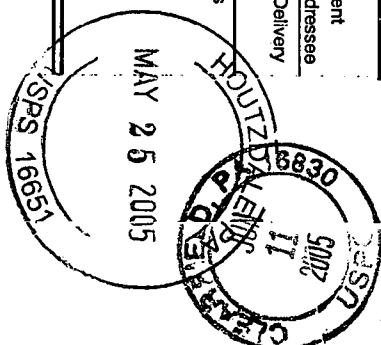
(Transfer from service label)

~~PS Form 3811, February 2006~~

~~Domestic Return Receipt~~

2809 2296 4004 05ET 4002

**102595-02-M-1540**

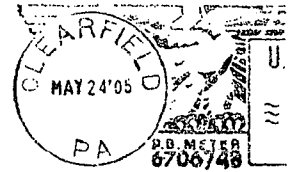




CHESTER A. HAWKINS  
SHERIFF  
COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830



7004 1350 0004 9672 6082

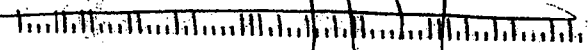


- ☐ Not Deliverable As Addressed
- ☐ Unable To Forward
- ☐ Insufficient Address
- ☐ Moved, Left No Address
- ☐ Unclaimed ☐ Refused
- ☐ Attempted-Not Known
- ☐ No Such Street ☐ Number
- ☐ Vacant ☐ Illegible
- ☐ No Mail Receptacle
- ☐ Box Closed-No Order
- ☐ Returned For Better Address
- ☐ Postage Due

UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL  
PERSONS, FIRMS OR ASSOCIATIONS CLAIMING RIGHT,  
TITLE OR INTEREST FROM OR UNDER ANITA P.  
SEDGWICK, DECEASED  
RR 1, BOX 10 IDA STREET  
HOUTZDALE, PA 16651

Name DK3  
1st Notice 5-25  
2nd Notice 5-31  
Return 6-9

1665113501



7004 1350 0004 9672 6082

U.S. Postal Service™  
**CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$4.60
Sent To: UNKNOWN HEIRS, SUCCESSORS, ASSIGNS, AND ALL PERSONS, FIRMS OR ASSOCIATIONS CLAIMING RIGHT, TITLE OR INTEREST FROM OR UNDER ANITA P. Street, Apt. No., or PO Box No. SEDGWICK, DECEASED City, State, ZIP+4 RR 1, BOX 10 IDA STREET HOUTZDALE, PA 16651	

PS Form 3800, June 2002

See Reverse for Instructions





CHESTER A. HAWKINS  
SHERIFF  
COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830

7-18-05

FOE



RICHARD R. SEDGWICK, IND & HEIR OF  
ANITA P. SEDGWICK, DECEASED

RR #1, BOX 1010A ST. A 1711A 741 1711A ST

HOUTZ

A C S

- ☐ INSUFFICIENT ADDRESS
- ☐ ATTEMPTED NOT KNOWN
- ☐ NO SUCH NUMBER/STREET
- ☒ NOT DELIVERABLE AS ADDRESSED
- ☐ OTHER

UNABLE TO FORWARD

RTS  
RETURN TO SENDER

16830-243882

