

04-1403-CD
WELLS FARGO BANK MINNESOTA, N. A. vs. JEFFREY BAINBRIDGE, et al.

Wells Fargo vs Jeffrey Bainbridge et al
2004-1403-CD

IZSO & OTTO, LLC
Attorneys at Law
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Piscataway, New Jersey 08854
By: David E. Alberts, Esq.
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Attorney for Plaintiff(s)
File No. OCW1002-03

FILED 2ccshf
610-49801 Atty pd.
SEP 10 2004 85.00

William A. Shaw
Prothonotary/Clerk of Courts

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF CLEARFIELD

WELLS FARGO BANK MINNESOTA, N.A., : IN THE COURT OF COMMON
AS TRUSTEE FOR DELTA FUNDING HOME : PLEAS
EQUITY LOAN ASSET-BACKED :
CERTIFICATES, SERIES 2001-2, :
Plaintiff, : CLEARFIELD COUNTY
vs. : DOCKET NO. 04-1403-CJ
JEFFREY BAINBRIDGE and BRENDA :
BAINBRIDGE :
Defendants. :
:

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.

LAWYERS REFERRAL SERVICE
PENNSYLVANIA BAR ASSOCIATION
P.O. BOX 186
HARRISBURG, PA 17108
TELEPHONE NUMBER 800-692-7375

COMPLAINT IN MORTGAGE FORECLOSURE

1. The plaintiff, **WELLS FARGO BANK MINNESOTA, N.A., AS TRUSTEE FOR DELTA FUNDING HOME EQUITY LOAN ASSET-BACKED CERTIFICATES, SERIES 2001-2**, brings this action to foreclose a mortgage dated July 20, 2001, between Jeffrey A Bainbridge and Brenda J. Bainbridge, mortgagors, and Delta Funding Corporation, mortgagee, which was recorded on August 29, 2001 in Clearfield County Recorder of Deeds Office, as Instrument No. 200113645. Said mortgage is hereby incorporated in this Complaint by reference.
2. The land subject to the mortgage is 129 East Scribner Avenue, City of DuBois, County of Clearfield, State of Pennsylvania. A legal description of said property is attached hereto and made apart hereof as Exhibit A.
3. (a). The defendants who are real owners of the land subject to the mortgage and their respective addresses are:
 - i. Jeffrey A. Bainbridge, 129 East Scribner Avenue, DuBois, Pennsylvania
 - ii. Brenda J. Bainbridge, 129 East Scribner Avenue, DuBois, Pennsylvania.

(b). The other defendants, their interest in the action or the property, and their respective addresses are: None
4. Said mortgage provides in pertinent part that upon default Lender shall give notice to Borrower prior to acceleration following Borrower's breach of any covenant or agreement in the Security Instrument. Said mortgage further provides that if the default is not cured on or before the date specified in the notice, Lender at its option may require immediate payment in full of all sums secured by the Security Instrument without further demand and

may foreclose this Security Instrument by judicial proceeding.

5. The mortgage is in default because the Defendants have not made payments on the mortgage from June 2003 through and including August 2004 and therefore pursuant to the terms of the mortgage set forth above the entire principal sum of the mortgage debt is due and payable.
6. The amount are due under said mortgage are as follows:

a.	Principal	37,795.27
b.	Interest	1,958.17
c.	Pre-payment Penalty	377.95
d.	Late Charges	254.07
e.	Property Inspection Fee	18.25
f.	Property Valuation Fee	219.00
g.	Tax Backsearch	35.00
h.	Certified Mail Cost	24.17
I.	Suspense Credit	<u>- 536.20</u>

TOTAL AMOUNT DUE	\$40,145.68
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WHEREFORE, Plaintiff respectfully requests the court to enter judgment for the amount due, and for foreclosure and sale of the mortgaged property.

IZSO & OTTO, LLC
Attorneys for Plaintiff

Dated: September 2, 2004

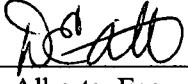
By: 
David E. Albers, Esq.

Exhibit A

ALL that certain lot or piece of land situated in the City of DuBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BOUNDED on the Northeast by an alley, on the Southeast by Lot No. 51 in the J. E. Long Addition, now or formerly owned by J. E. Berkley; on the Southwest by East Scribner Avenue, and on the Northwest by Western Unit of Lot No. 50 of the J. E. Long's Addition, now or formerly owned by A. K. Owens; said lot being 25 feet wide on East Scribner Avenue, and extending back equal breadth to the alley, 150 feet, and 25 feet wide on said alley.

BEING known and designated as Parcel No. 7.24-959A in the Deed Registry Office of Clearfield County, more commonly known as 129 East Scribner Avenue.

Under and subject to easements, rights of way, oil and gas leases, restrictions, reservations, exceptions, agreements and coal and mining rights as set forth in prior instruments of record.

Being all that same property which by BEING the same premises which Roy T. Baker and Elizabeth J. Baker, husband and wife by Deed dated July 19, 1993 and recorded August 11, 1993 in Clearfield County Deed Book 1549 Page 290 granted and conveyed unto Charles Pravocott Jr. and Patricia A. Pravocott, husband and wife, in fee.

In The Court of Common Pleas of Clearfield County, Pennsylvania

WELLS FARGO BANK MINNESOTA

VS.

BAINBRIDGE, JEFFREY & BRENDA

COMPLAINT IN MORTGAGE FORECLOSURE

Sheriff Docket # 16263

04-1403-CD

SHERIFF RETURNS

NOW SEPTEMBER 20, 2004 AT 10:30 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON BRENDA BAINBRIDGE, DEFENDANT AT RESIDENCE, 129 EAST SCRIBNER AVE., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BRENDA BAINBRIDGE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: COUDRIET

NOW SEPTEMBER 20, 2004 AT 10:30 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON JEFFREY BAINBRIDGE, DEFENDANT AT RESIDENCE, 129 EAST SCRIBNER AVE., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BRENDA BAINBRIDGE, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: COUDRIET

Return Costs

Cost	Description
52.87	SHERIFF HAWKINS PAID BY: ATTY CK# 3239
20.00	SURCHARGE PAID BY: ATTY CK# 3240

Sworn to Before Me This

23rd Day Of Sept, 2004
William A. Shaw

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

So Answers,

Chester Hawkins
My Mawlyn Hawn
Chester A. Hawkins
Sheriff

FILED
018:56871
SEP 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

Notice of Proposed Termination of Court Case

January 26, 2012

RE: 2004-01403-CD

Wells Fargo Bank Minnesota, N.A.

Vs.

Jeffrey Bainbridge
Brenda Bainbridge

FILED

JAN 26 2012

William A. Shaw
Prothonotary/Clerk of Courts

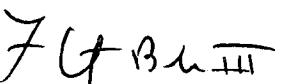
To All Parties and Counsel:

Please be advised that the Court intends to terminate the above captioned case without notice, because the Court records show no activity in the case for a period of at least two years.

You may stop the Court terminating the case by filing a Statement of Intention to Proceed. The Statement of Intention to Proceed must be filed with the **Prothonotary of Clearfield County, PO Box 549, Clearfield, Pennsylvania 16830**. The Statement of Intention to Proceed must be filed on or before **March 28, 2012**.

If you fail to file the required statement of intention to proceed within the required time period, the case will be terminated.

By the Court,


F. Cortez Bell, III, Esq.
Court Administrator

Court of Common Pleas of Clearfield County, Pennsylvania
Civil Division

Wells Fargo Bank Minnesota, N.A.

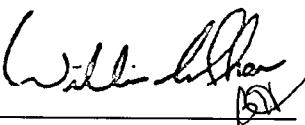
Vs.

2004-01403-CD

Jeffrey Bainbridge
Brenda Bainbridge

Termination of Inactive Case

This case is hereby terminated with prejudice this July 26, 2012, as per Rule 230.2



William A. Shaw
Prothonotary

FILED

BS JUL 26 2012 *CK*
William A. Shaw
Prothonotary/Clerk of Courts