

04-1792-CD  
NATIONAL CITY MORTGAGE CO. et al. vs. BRADLEY WILSON, et al.

2004-1792-CD

National Mortgage vs Bradley Wilson et al

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION

v.  
Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801

Clearfield County

NOV 10 2004

William A. Shaw  
Prothonotary  
2 CEN to SHER

NO. 2004-1792-CB

Defendant(s)

COMPLAINT IN MORTGAGE FORECLOSURE

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  
David S. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext. 5982

**AVISO**

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

**LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.**

**David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext. 5982**

## **NOTICE**

**The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.**

**If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.**

**This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.**

**UDREN LAW OFFICES, P.C.  
/s/ Mark J. Udren, Esquire  
Woodcrest Corporate Center  
111 Woodcrest Road, Suite 200  
Cherry Hill, NJ 08003-3620  
(856) 669-5400**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: **N/A**

Assignments of Record to: **N/A**

Recording Date: **N/A**

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: RD. 2, Box 454 (Oklahoma Salem Road) a/k/a 1052 Lines Road

MUNICIPALITY/TOWNSHIP/BOROUGH: Brady Township

COUNTY: Clearfield

DATE EXECUTED: 03/21/01

DATE RECORDED: 03/28/01 INSTR NO.: 200104319

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

(a) by failing or refusing to pay the installments of

principal and interest when due in the amounts indicated below;

- (b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 11/06/04:

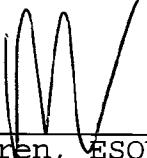
Principal of debt due	\$65,945.87
Unpaid Interest at 7.50% from 06/01/04 to 11/06/04 (the per diem interest accruing on this debt is \$13.74 and that sum should be added each day after 11/06/04)	2,128.55
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Escrow Overdraft/ (Balance) (The monthly escrow on this account is \$160.84 and that sum should be added on the first of each month after 11/06/04)	157.39
Late Charges (monthly late charge of \$23.84 should be added in accordance with the terms of the note each month after 11/06/04)	191.79
Other fees due	43.98
Attorneys Fees (anticipated and actual to 5% of principal)	<u>3,297.29</u>
<b>TOTAL</b>	<b>\$72,369.87</b>

7. The attorney's fee 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 in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been sent to each defendant, via certified and regular mail, in

accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$72,369.87 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



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Mark J. Udren, ESQUIRE  
UDREN LAW OFFICES, P.C.  
Attorney for Plaintiff  
Attorney I.D. No. 04302

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATE IN BRADY TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO WIT:

BEGINNING AT A CORNER IN THE CENTER OF TOWNSHIP ROAD ROUTE NO. T-370, SAID CORNER BEING THE NORTHWEST CORNER OF THE LAND OF EDWARD SWANSON, (THE SAME LAND BEING ORIGINALLY A PART OF THE TRACT OF WHICH THIS LOT IS A PART), AND ALSO BEING THE SOUTHWEST CORNER OF THE TRACT OR LOT HEREIN DESCRIBED; THENCE BY THE CENTERLINE OF SAID TOWNSHIP ROAD, NORTH  $6^{\circ} 47'$  WEST FOR A DISTANCE OF 208.1 FEET; AND STILL BY SAID CENTERLINE OF SAID TOWNSHIP ROAD, NORTH  $16^{\circ} 32'$  WEST FOR A DISTANCE OF 135 FEET TO A CORNER AT THE INTERSECTION OF THE CENTERLINES OF THE SAID TOWNSHIP ROAD AND ANOTHER DIRT ROAD, NOW PURPORTED TO BE A TOWNSHIP ROAD; THENCE BY THE CENTERLINE OF SAID DIRT ROAD OR TOWNSHIP ROAD, SOUTH  $79^{\circ} 23'$  EAST FOR A DISTANCE OF 225.7 FEET TO A CORNER IN THE CENTERLINE OF SAID ROAD; THENCE LEAVING THE SAID DIRT ROAD OR TOWNSHIP ROAD AND THROUGH THE LANDS OF JACK LINES, ET UX. FOR A NEW LINE, SOUTH  $3^{\circ} 41'$  EAST, PASSING THROUGH AN IRON PIN AT 19.8 FEET AND CONTINUING ON FOR A TOTAL DISTANCE OF 272.0 FEET TO AN IRON PIN, THE SAME IRON PIN CORNER BEING THE NORTHEAST CORNER OF LAND OF EDWARD SWANSON AFOREMENTIONED; THENCE BY THE SAID EDWARD SWANSON, SOUTH  $83^{\circ} 49'$  WEST FOR A DISTANCE OF 176 FEET TO AN IRON PIN AND PLACE OF BEGINNING. CONTAINING IN ALL 1.3145 ACRES IN ALL.

# National City<sup>®</sup>

## Mortgage

**National City Mortgage Co.**  
A Subsidiary of National City Bank of Indiana  
3232 Newmark Drive • Miamisburg, Ohio 45342  
Telephone: (937) 910-1200

September 03, 2004

Bradley Wilson  
Rd2 Box 454(okl  
Dubois PA 15801

Loan No. 029387-1  
Current Servicer: National City Mortgage

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

**NATURE OF THE DEFAULT**-- The MORTGAGE debt held by the above lender on your property located at:

Rd2 Box 454(okl  
Dubois PA 15801

IS SERIOUSLY IN DEFAULT because:

YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following month(s) 7/1/2004 - 9/1/2004

and the following amount(s) are now past due:

Monthly Payments	1,913.13
Late Charges	167.95
Other Fees	25.98
Less Suspense Balance	.00-
Total Due	2,107.06

YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION  
(Do not use if not applicable):

HOW TO CURE THE DEFAULT - You may cure the default within thirty (30) days  
HOW TO CURE THE DEFAULT

of the date of this notice **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS \$ 2,107.06, PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD.**

Payments must be made either by cashier's check, certified check, cash or money order made payable and sent to:

National City Mortgage  
Attn: Customer Counseling Department  
3232 Newmark Dr.  
Miamisburg, OH 45342

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable)

# National City Mortgage

**National City Mortgage Co.**  
A Subsidiary of National City Bank of Indiana  
3232 Newmark Drive • Miamisburg, Ohio 45342  
Telephone: (937) 910-1200

**Mailing Address:**  
P.O. Box 1820  
Dayton, Ohio 45401-1820

September 03, 2004

Bernadette Wilson  
Rd2 Box 454(okl  
Dubois PA 15801

Loan No. 029387-1  
Current Servicer: National City Mortgage

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

**NATURE OF THE DEFAULT**-- The MORTGAGE debt held by the above lender on your property located at:

Rd2 Box 454(okl  
Dubois PA 15801

IS SERIOUSLY IN DEFAULT because:

YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following month(s)  
7/1/2004 - 9/1/2004  
and the following amount(s) are now past due:

Monthly Payments	1,913.13
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Total Due	2,107.06

YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION  
(Do not use if not applicable):

HOW TO CURE THE DEFAULT - You may cure the default within thirty (30) days  
HOW TO CURE THE DEFAULT

of the date of this notice BY PAYING THE TOTAL AMOUNT PAST DUE TO THE  
LENDER, WHICH IS \$ 2,107.06, PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES  
WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD.

Payments must be made either by cashier's check, certified check, cash  
or money order made payable and sent to:

National City Mortgage  
Attn: Customer Counseling Department  
3232 Newmark Dr.  
Miamisburg, OH 45342

You can cure any other default by taking the following action within  
THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable)

# ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

This is an official notice that the mortgage on your home is in default, and the lender intends to Foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help save your home. This Notice explains how the program works.  
To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.  
The name, address and phone number of Consumer Credit Counseling Agencies serving your County are included with this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM  
YOU MAY BE ELIGIBLE FOR FINANCIAL ASSISTANCE WHICH CAN SAVE  
YOUR HOME FROM FORECLOSURE AND HELP YOU MAKE FUTURE  
MORTGAGE PAYMENTS.

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

- **IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL.**
- **IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND**
- **IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.**

**TEMPORARY STAY OF FORECLOSURE** – Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the consumer credit counseling agencies listed at the end of this Notice. **THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE.** The part of this notice called "HOW TO CURE YOUR MORTGAGE DEFAULT", explains how to bring your mortgage up to date.

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

**APPLICATION FOR MORTGAGE ASSISTANCE** – Your mortgage is in default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default). If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application **MUST** be filed or postmarked within thirty (30) days of your face-to-face meeting.

**YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.**

**AGENCY ACTION** – Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act.

The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

**NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT.**

(If you have filed bankruptcy, you can still apply for Emergency Mortgage Assistance.) **IF YOU DO NOT CURE THE DEFAULT** (see page 1) – If you do not cure the default within THIRTY (30) DAYS of the date of this Notice, **the lender intends to exercise its rights to accelerate the mortgage debt**. This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within THIRTY (30) DAYS, the lender also intends to instruct its attorneys to start legal action to **foreclose upon your mortgage property**.

**IF THE MORTGAGE IS FORECLOSED UPON** – The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorneys' fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. **If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.**

**OTHER LENDER REMEDIES** – The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

**RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE** – If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, **you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale**. You may do so by paying the total amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. Curing your default in the manner set forth in this notice will restore your mortgage to the same position as if you had never defaulted.

**EARLIEST POSSIBLE SHERIFF'S SALE DATE** – It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be approximately **FOUR(4) months from the date of this Notice**. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

HOW TO CONTACT THE LENDER: Name of Lender: National City Mortgage

Address: 3232 Newmark Dr. Miamisburg OH 45342

Phone Number: 1-800-523-8654

Fax Number: (937) 910-4058

Contact Person: COLLECTIONS DEPT.

EFFECT OF SHERIFF'S SALE - You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishing and other belongings could be started by the lender at any time.

ASSUMPTION OF MORTGAGE - You may or may not be able to sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied. For additional information please contact the Collection Dept.

YOU MAY ALSO HAVE THE RIGHT:

TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT  
OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF  
THIS DEBT.

TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BE-  
HALF.

TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DE-  
FAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT  
HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY  
CALENDAR YEAR.)

TO ASSERT THE NONEXISTENCE OF DEFAULT IN ANY FORECLOSURE PRO-  
CEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE  
DOCUMENTS.

TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH  
ACTION BY THE LENDER.

TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

**APPENDIX C**  
**PENNSYLVANIA HOUSING FINANCE AGENCY**  
**HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM**  
**CONSUMER CREDIT COUNSELING AGENCIES**

(Rev. 6/)

**ADAMS COUNTY**

American Red Cross—  
 Hanover Chapter  
 529 Carlisle Street  
 Hanover, Pennsylvania 17331  
 (717) 637-3788  
 FAX (717) 637-3294

CCCS of Western PA  
 2000 Linglestown Road  
 Harrisburg PA 17102  
 (717) 541-1757  
 FAX (717) 541-4670

Financial Counseling Services of  
 Franklin  
 31 West 3rd Street  
 Waynesboro, PA 17268  
 (717) 762-3285

Adams County Housing Authority  
 139-143 Carlisle St  
 Gettysburg PA 17325  
 (717) 334-1518  
 FAX (717) 334-8326

**ALLEGHENY COUNTY**  
 Pennsylvania Housing Finance Agency  
 (Marcia Hess)  
 2275 Swallow Hill road, Bldg 200  
 Pittsburgh, PA 15220  
 (412) 429-2842  
 FAX (412) 429-2835

Credit Counselors of PA  
 401 Wood Street, Suite 906  
 Pittsburgh, PA 15222  
 (412) 338-9954 or (800) 737-2933  
 FAX (412) 338-9963

Action Housing, Inc.  
 425 6th Avenue, Suite 950  
 Pittsburgh, PA 15219  
 (412) 391-1956 or (412) 281-2102 or  
 1 (800) 792-2801  
 FAX (412) 391-4512

Community Action Southwest  
 22 West High Street  
 Waynesburg, PA 15370  
 (724) 852-2893

CCCS of Western Pennsylvania, Inc.  
 309 Smithfield Street  
 Pittsburgh, PA 15222  
 (412) 471-7584

Housing Opportunities  
 133 Seventh Street  
 McKeesport PA 15132  
 (412) 664-1906  
 Fax (412) 664-0873

Urban League Of Pittsburgh  
 Bldg. For Equal Opportunity  
 One Smithfield St.  
 Pittsburgh PA 15222-2222  
 (412) 227-4802  
 FAX (412) 261-5207

Mon-Valley Unemployed Committee  
 120 E. 9th Avenue  
 Homestead, PA 15120  
 (412) 462-9962

**ARMSTRONG COUNTY**  
 CCCS of Western Pennsylvania, Inc.  
 217 E. Plank Road  
 Altoona PA 16602  
 (814) 944-8100 or (814) 944-5747

Indiana Co. Community Action  
 Program  
 827 Water Street, Box 187  
 Indiana PA 15701  
 (724) 465-2657  
 FAX (724) 465-5118

Credit Counselors of PA  
 401 Wood Street, Suite 906  
 Pittsburgh, PA 15222  
 (412) 338-9954 or  
 1(800) 737-2933  
 FAX (412) 338-9983

**BEAVER COUNTY**  
 Action Housing, Inc.  
 425 6th Avenue, Suite 950  
 Pittsburgh, PA 15219  
 (412) 391-1956  
 FAX (412) 391-4512

CCCS of Western Pennsylvania, Inc.  
 971 Third Street  
 Beaver, PA 15009  
 (724) 774-0798

Housing Opportunities of Beaver  
 County, Inc.  
 650 Corporation St, Suite 207  
 Beaver, PA 15009  
 (724) 728-7511

Mon Valley Unemployed Committee  
 120 E. 9th Avenue  
 Homestead, PA 15120  
 (412) 462-9962  
 (412) 462-9964

Housing Opportunities Inc.  
 133 Seventh Street  
 P.O. Box 9  
 McKeesport PA 15134

Credit Counselors of PA  
 401 Wood Street, Suite 906  
 Pittsburgh, PA 15222  
 (412) 338-9954 or (800) 737-2933  
 FAX (412) 338-9963

**BEDFORD COUNTY**  
 Bedford-Fulton Housing Services  
 10241 Lincoln Highway  
 Everett, PA 15537  
 (814) 623-9129  
 FAX (814) 623-7187

CCCS of Western Pennsylvania, Inc.  
 217 E. Plank Road  
 Altoona PA 16602  
 (814) 944-8100  
 FAX (814) 944-5747

Keystone Economic  
 Development Corporation  
 1954 Mary Grace Lane  
 Johnstown, PA 15901  
 (814) 535-6556  
 FAX (814) 539-1688

Tableland Services, Inc.  
 535 East Main Street  
 Somerset PA 15501  
 (814) 445-9628 or (814) 443-3690  
 FAX (814) 443-3690

Weatherization Office  
 917 Mifflin Street  
 Huntingdon, PA 16652  
 (814) 643-2343

CCCS of Lehigh Valley  
 3671 Crescent Court East  
 Whitehall PA 18052  
 (610) 821-4011 or 800-220-2733 (814)  
 only  
 FAX (610) 821-8932

Economic Opportunity Cabinet of  
 Schuylkill County  
 225 N. Centre Street  
 Pottsville, PA 17901  
 (717) 622-1995  
 FAX (717) 622-0429

Community Housing Counselor, Inc.  
 P.O. Box 244  
 Kennett Square, PA 19348  
 (610) 444-3682  
 FAX (610) 444-8243

**BLAIR COUNTY**  
 Bedford-Fulton Housing Services  
 R.D.#1, Box 384  
 Everett, PA 15537  
 (814) 623-9129  
 FAX (814) 623-7187

Keystone Economic Development Corp  
 1954 Mary Grace Lane  
 Johnstown PA 15901  
 (814) 535-6556  
 FAX (814) 539-1688

CCCS of Western Pennsylvania, Inc.  
 217 E. Plank Road  
 Altoona PA 16602  
 (814) 944-8100 or (814) 944-5747

Weatherization Office  
 917 Mifflin Street  
 Huntingdon, PA 16652  
 (814) 643-2343

**BRADFORD COUNTY**  
 CCCS of Northeastern Pennsylvania  
 1400 Abington Executive Park, Suite 1  
 Clarks Summit, PA 18411  
 (570) 587-9163 OR 1-800-922-9537  
 FAX (570) 587-9134/9135

31 W. Market St.  
 Wilkes-Barre, PA 18702  
 (570) 821-0837 or 800-922-9537  
 FAX (570) 821-1785

9 South 7th Street  
 Stroudsburg PA 18360  
 (570) 420-8980 or 800-922-9537  
 FAX (570) 420-8981

1631 S. Atherton St, Suite 100  
 State College, PA 16801  
 (814) 238-3668  
 FAX (814) 2383669

The Trehab Center of Northeastern PA  
 10 Public Avenue  
 Monroeville, PA 15214  
 (570) 278-3338 or 800-982-4045  
 FAX (570) 278-1889

185 Elmira Street  
 P.O. Box 218  
 Troy, PA 16947  
 (570) 297-2101

German Street; P.O. Box 389  
 Dushore, PA 18814  
 (570) 928-9668  
 FAX (570) 928-8144

103 Warren Street, P.O. Box 709  
 Tunkhannock PA 18657

33 Walnut Street  
 Wellboro, PA 16901  
 (570) 724-5252  
 FAX (570) 724-5783  
 901 Main Street  
 Honesdale PA 18431  
 (570) 253-8941  
 FAX (570) 253-4817

**BUCKS COUNTY**

Acorn Housing Corporation  
 846 North Broad Street  
 Philadelphia, PA 19130  
 (215) 765-1221  
 FAX (215) 765-1427

Northwest Counseling Service  
 5001 North Broad Street  
 Philadelphia, PA 19141  
 (215) 324-7500  
 FAX (215) 324-8753

Bucks County Housing Group, Inc.  
 140 East Richardson Avenue  
 Langhorne, PA 19047  
 (215) 750-4310  
 FAX (215) 750-4318

CCCS of Delaware Valley  
 1515 Market Street • Suite 1325  
 Philadelphia PA 19107  
 (215) 563-5665  
 FAX (215) 864-2666

**HACE**  
 167 Allegheny Ave 2nd Fl.  
 Philadelphia, PA 19140  
 (215) 426-8025  
 FAX (215) 426-9122

CCCS of Delaware Valley  
 Trevose Corporate Center  
 4606 Street Road  
 Trevose PA 19047  
 (215) 563-5665

Community Devel. Corp of Frankford  
 4620 Griscom Street  
 Philadelphia, PA 19124  
 (215) 744-2990  
 FAX (215) 744-2012

CCCS of Lehigh Valley  
 3671 Crescent Court East  
 Whitehall, PA 18052  
 (610) 821-4011 OR 800-220-2733  
 FAX (610) 821-8932

Am. Can. Credit Counseling Institute  
 845 Coates St.  
 Coatesville PA 19320  
 (888) 212-6741

144 E Dekalb Pike  
 King of Prussia PA 19406  
 610-971-2210  
 FAX (610) 265-4814

755 York Rd, Suite 103  
 Warminster PA 18974  
 (215) 444-9429  
 FAX (215) 956-6344

**BUTLER COUNTY**  
 Action Housing, Inc.  
 425 6th Avenue, Suite 950  
 Pittsburgh, PA 15219  
 (412) 391-1956 or (412) 281-2102  
 FAX (412) 391-4512

CCCS of Western PA  
 YMCA Building  
 339 North Washington Street

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600 Corporate St., Suite 207  
McKeesport, PA 15132  
(412) 664-1580  
FAX (412) 664-0873

Mon Valley Unemployed Committee  
120 E. 9th Avenue  
Homestead, PA 15120  
(412) 462-9982  
FAX (412) 462-9984

Housing Opportunities Inc.  
133 Seventh Street  
P.O. Box 9  
McKeesport, PA 15134  
(412) 664-1906  
FAX (412) 664-0873

Credit Counselors of PA  
401 Wood Street, Suite 906  
Pittsburgh, PA 15222  
(412) 338-9954 or 1(800) 737-2933  
FAX (412) 338-9963

**CAMBRIA COUNTY**  
Bedford-Fulton Housing Services  
R.D.#1, Box 384  
Everett, PA 15537  
(814) 623-9129  
FAX (814) 623-7187

CCCS of Western PA  
217 E. Plank Road  
Altoona PA 16602  
(814) 944-8100  
FAX (814) 944-5747

Indiana County Community Action  
Program  
827 Water Street, Box 187  
Indiana, PA 15701  
(412) 465-2557  
FAX (412) 465-5118

Keystone Econ Development Corp.  
1954 Mary Grace Lane  
Johnstown PA 15901  
(814) 535-8556  
FAX (814) 539-1688

CCCS of Western PA  
219-A College Park Plaza  
Johnstown PA 15904  
(814) 539-6335  
Tableland Services, Inc.  
535 East Main Street  
Somerset PA 15501  
(814) 445-9628 or 1-800-452-0148  
FAX (814) 443-3690

**CAMERON COUNTY**  
Northern Tier Community Action  
Corp.  
P.O. Box 389  
135 West 4th Street  
Emporium, PA 15834  
(814) 486-1161  
FAX (814) 486-0825

CCCS of Western PA  
217 E. Plank Road  
Altoona PA 16602  
(814) 944-8100  
FAX (814) 944-5747  
CCCS of Western PA  
217 E. Plank Road  
Altoona PA 16602  
(814) 944-8100  
FAX (814) 944-5747

**CARBON COUNTY**  
EOC of Schuylkill County  
225 N. Centre Street  
Pottsville, PA 17901  
(570) 622-1995  
FAX (570) 622-0429

## NATIONAL CITY

3671 Crescent Court East  
Whitehall PA 18052  
610-821-4011 or 800-220-2733  
570 & 814 only for 800#  
FAX (810) 821-0137

CCCS of Northeastern Pennsylvania  
1400 Abington Executive Park, Suite 1  
Clarke Summit, PA 18411  
(570) 587-9163 OR 1-800-922-9537  
FAX (570) 587-9134/9135

31 W. Market St.  
Wilkes-Barre, PA 18702  
(570) 821-0837 or 800-922-9537  
FAX (570) 821-1785

9 South 7th Street  
Stroudsburg PA 18380  
(570) 420-8980 or 800-922-9537  
FAX (570) 420-8981

1631 S Atherton St, Suite 100  
State College, PA 16801  
(814) 238-3668  
FAX (814) 238-3669

Commission on Economics Opportunity  
of Luzerne County  
163 Amber Lane  
Wilkes-Barre, PA 18702  
(570) 828-0510 OR 1-800-822-0359  
FAX (570) 829-1865—CALL BEFORE  
FAXING  
(570) 455-4994 HAZELTON  
FAX (570) 455-5631—CALL BEFORE  
FAXING  
(570) 836-4090 TUNKHANNOCK

**CENTRE COUNTY**  
CCCS of Western Pennsylvania, Inc.  
217 E. Plank Road  
Altoona, PA 16602  
(814) 944-8100  
FAX (814) 944-5747

Lycoming-Clinton Co Comm For  
Community  
Action (STEP)  
2138 Lincoln Street  
P.O. Box 1328  
Williamsport, PA 17703  
(570) 326-0587  
FAX (570) 322-2197

CCCS of Northeastern PA  
1631 S. Atherton St, Suite 100  
State College PA 16801  
(814) 238-3668  
FAX (814) 238-3669

CCCS of Northeastern PA  
201 Basin Street  
Williamsport, PA 17703  
(570) 326-0587  
FAX (570) 322-2197

**CHESTER COUNTY**  
Acorn Housing Corporation  
846 North Broad Street  
Philadelphia, PA 19130  
(215) 765-1221  
FAX (215) 765-1427

Northwest Counseling Services  
5001 N. Broad Street  
Philadelphia, PA 19141  
(215) 324-7500  
FAX (215) 324-8753

Budget Counseling Center  
247 North Fifth Street  
Reading, PA 19601  
(610) 375-7866  
FAX (610) 375-7830

CCCS of Delaware Valley  
1515 Market Street, Suite 1325  
Philadelphia, PA 19107  
(215) 563-5665  
FAX (215) 563-7020

## HACE

167 W. Allegheny Ave, 2nd Fl.  
Philadelphia, PA 19140  
(215) 428-8925  
FAX (215) 426-9122  
Community Housing Counseling Inc  
P.O. Box 244  
Kennett Square, PA 19348  
(610) 444-3682  
FAX (610) 444-8243

Media Fellowship House  
302 S. Jackson Street  
Media, PA 19063  
(610) 565-0846  
FAX (610) 565-8567

Phila Council For Community Adv  
100 North 17th Street, Suite 600  
Philadelphia, PA 19103  
(215) 587-7803  
FAX (215) 983-9941

Tabor Community Services, Inc.  
439 E. King Street  
Lancaster, PA 17602  
(717) 397-5182 OR 1-800-788-5062  
(H.O. only)  
FAX (717) 399-4127

Community Devel. Corp of Frankford  
Group Ministry  
4620 Griscom Street  
Philadelphia, PA 19124  
(215) 744-2990  
FAX (215) 744-2012

American Red Cross of Chester  
1729 Edgemont Avenue  
Chester, PA 19013  
(610) 874-1484

CCCS of Delaware Valley  
Marshall Building  
790 E. Market St., Suite 215  
West Chester, PA 19382  
(215) 563-5665

American Credit Counseling Institute  
845 Coates St.  
Coatesville PA 19320  
(888) 212-6741  
144 E. Dekalb Pike

King of Prussia, PA 19406  
(610) 971-2210  
FAX (610) 265-4814

755 York Rd, Suite 103  
Warrington PA 18974  
(215) 444-8429  
FAX (215) 956-6344

**CLARION COUNTY**  
CCCS of Western Pennsylvania, Inc.  
YMCA Building  
339 North Washington Street  
Butler, PA 16001  
(412) 282-7812

**CLEARFIELD COUNTY**  
Keystone Economic Development  
Corporation  
1954 Mary Grace Lane  
Johnstown, PA 15901  
(814) 535-6556  
FAX (814) 539-1688

Indiana Co. Community Action  
Program  
827 Water Street, Box 187  
Indiana, PA 15701  
(724) 465-2657  
FAX (412) 465-5118

CCCS of Western Pennsylvania, Inc.  
217 E. Plank Road  
Altoona PA 16602  
(814) 944-8100  
FAX (814) 944-5747

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CCCS of Northeastern PA  
1631 S Atherton St., Suite 100  
State College, PA 16801  
(814) 238-3668  
FAX (814) 238-3669

CCCS of Western PA  
219-A College Park Plaza  
Johnstown PA 15904  
(814) 539-6335

**CLINTON COUNTY**  
Lycoming-Clinton Counties  
Commission For Community Action  
(STEP)  
2138 Lincoln Street  
P.O. Box 1328  
Williamsport, PA 17703  
(570) 326-0587  
FAX (570) 322-2197

CCCS of Northeastern PA  
1631 S Atherton St., Suite 100  
State College, PA 16801  
(814) 238-3668  
FAX (814) 238-3669

CCCS of Northeastern PA  
201 Basin Street  
Williamsport, PA 17703  
(570) 323-6627  
FAX (570) 323-6625

**COLUMBIA COUNTY**  
CCCS of Northeastern Pennsylvania  
31 W. Market Street  
Wilkes-Barre, PA 18702  
(570) 821-0837 OR 1-800-922-9537  
FAX (570) 821-1785

1400 Abington Executive Park, Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 or 800-922-9537  
FAX (570) 587-9134/9135

Commission on Economics Opportunity  
of Luzerne County  
163 Amber Lane  
Wilkes-Barre, PA 18702  
(570) 826-0510 OR 1-800-822-0359  
FAX (570) 829-1665—CALL BEFO  
FAXING  
(570) 455-4994 HAZELTON  
FAX (570) 455-5631—CALL BEFO  
FAXING  
(570) 836-4090 TUNKHANNOCK

**CRAWFORD COUNTY**  
Booker T. Washington Center  
1720 Holland Street  
Erie, PA 16503  
(814) 453-5744  
FAX (814) 453-5749

Greater Erie Community Action  
Committee  
18 West 9th Street  
Erie, PA 16501  
(814) 459-4581  
FAX (814) 456-0161

John F. Kennedy Center, Inc.  
2021 East 20th Street  
Erie, PA 16510  
(814) 898-0400  
FAX (814) 898-1243

Shenango Valley Urban League, Inc  
601 Indiana Avenue  
Farrell, PA 16212  
(412) 981-5310

**CUMBERLAND COUNTY**  
CCCS of Western Pennsylvania, Inc.  
2000 Linglestown Road  
Harrisburg, PA 17102  
(717) 641-1757  
FAX (717) 541-4670

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Franklin County Services, Inc.

31 West 3rd Street  
Waynesboro, PA 17268  
(717) 762-3285

Urban League of Metropolitan  
Harrisburg  
N. 6th Street  
Harrisburg, PA 17101  
(717) 234-5925  
FAX (717) 234-8459

YWCA of Carlisle  
301 G Street  
Carlisle, PA 17013  
(717) 243-3818  
FAX (717) 731-5859

Community Action Comm of the Capital  
Region  
1514 Derry Street  
Harrisburg, PA 17104  
(717) 232-8757  
FAX (717) 234-2227

Adams County Housing Authority  
139-143 Carlisle St.  
Gettysburg, PA 17325  
(717) 334-1518  
FAX (717) 334-8326

**DAUPHIN COUNTY**  
CCCS of Western Pennsylvania, Inc.  
2000 Linglestown Road  
Harrisburg, PA 17102  
(717) 541-1757  
FAX (717) 541-4670

Urban League of Metropolitan  
Harrisburg  
2107 N. 6th Street  
Harrisburg, PA 17101  
(717) 234-5925  
FAX (717) 234-9459

Community Action Commission  
of the Capital Region  
1514 Derry Street  
Harrisburg PA 17104  
(717) 232-9757  
FAX (717) 234-2227

**DELAWARE COUNTY**  
Acorn Housing Corporation  
846 North Broad Street  
Philadelphia, PA 19130  
(215) 765-1221  
FAX (215) 765-1427

Northwest Counseling Service  
5001 North Broad Street  
Philadelphia, PA 19141  
(215) 324-7500  
FAX (215) 324-8753

CCCS of Delaware Valley  
1515 Market Street-Suite 1325  
Philadelphia, PA 19107  
(215) 563-5685  
FAX (215) 864-2666

**HACE**  
167 W. Allegheny Ave., 2nd Floor  
Philadelphia, PA 19140  
(215) 426-8025  
FAX (215) 426-9122

Media Fellowship House  
302 S. Jackson Street  
Media, PA 19063  
(610) 565-0846  
FAX (610) 565-8567

Community Housing Counselor, Inc.  
P.O. Box 244  
Kennett Square PA 19348  
(610) 444-3682  
FAX (610) 444-8243

## NATIONAL CITY

Philadelphia Council For Community  
Adv  
100 North 17th Street  
Suite 600  
Philadelphia, PA 19103  
(215) 587-7803  
FAX (215) 983-9941

Community Devel Corp of Frankford  
Group Ministry  
4620 Griscom Street  
Philadelphia, PA 19124  
(215) 744-2990  
FAX (215) 744-2012

American Red Cross of Chester  
1729 Edgmont Avenue  
Chester, PA 19013  
(610) 674-1484

CCCS of Delaware Valley  
280 North Providence Road  
Media, PA 19063  
(215) 563-5665

ACCI  
175 Stratford Ave, Suite 1  
Wayne PA 19087  
(610) 671-2210  
FAX (610) 687-7860

ACCI  
144 E. Dekalb Pike  
King of Prussia, PA 19406  
(610) 971-2210

## ELK COUNTY

John F. Kennedy Center, Inc.  
2021 East 20th Street  
Erie, PA 16510  
(814) 898-0400  
FAX (814) 898-1243

Northern Tier Community Action Corp  
P.O. Box 389  
135 West 4th Street  
Emporium, PA 15834  
(814) 486-1161  
FAX (814) 486-0825

## ERIE COUNTY

Booker T. Washington Center  
1720 Holland Street  
Erie, PA 16503  
(814) 453-5744  
FAX (814) 453-5749

Greater Erie Community Action  
Committee  
18 West 9th Street  
Erie, PA 16501  
(814) 459-4581  
FAX (814) 456-0181

John F. Kennedy Center, Inc.  
2021 East 20th Street  
Erie, PA 16510  
(814) 898-0400  
FAX (814) 898-1243

## FAYETTE COUNTY

Action Housing, Inc.  
425 6th Avenue, Suite 950  
Pittsburgh, PA 15219  
(412) 391-1956 or (412) 281-2102  
FAX (412) 391-4512

Community Action Southwest  
22 West High Street  
Waynesboro, PA 15370  
(724) 852-2893

CCCS of Western Pennsylvania, Inc.  
1 North Gate Square  
#2 Garden Center Drive  
Greensburg, PA 15601  
(724) 838-1290

Fayette Co. Community Action Agency,  
Inc.  
137 North Beeson Avenue  
Uniontown, PA 15401  
(724) 437-6050 OR 1-800-427-INFO

NO. 1219 P. 8

Weatherization Office  
917 Millin Street  
Huntingdon, PA 16522  
(814) 643-2343

## GREENE COUNTY

Action Housing, Inc.  
425 6th Avenue, Suite 950  
Pittsburgh, PA 15219  
(412) 391-1956 or (412) 281-2102  
FAX (412) 391-4512

Mon-Valley Unemployed Committee  
120 E. 9th Avenue  
Homestead, PA 15120  
(412) 462-9962  
FAX (412) 462-9964

Community Action Southwest  
22 West High Street  
Waynesburg, PA 15370  
(724) 852-2893  
FAX (412) 627-7713

CCCS of Western Pennsylvania, Inc.  
1 North Gate Square  
#2 Garden Center Drive  
Greensburg, PA 15601  
(724) 838-1290

**HUNTINGDON COUNTY**  
Bedford-Fulton Housing Services  
RD 1, Box 384  
Everett, PA 15537  
(814) 623-9129  
FAX (814) 623-7187

CCCS of Western Pennsylvania, Inc.  
217 E. Plank Road  
Altoona, PA 16602  
(814) 944-8100  
FAX (814) 944-5747

Weatherization Office  
917 Mifflin Street  
Huntingdon, PA 16652  
(814) 643-2343

**INDIANA COUNTY**  
CCCS of Western Pennsylvania, Inc.  
1 North Gate Square  
#2 Garden Center Drive  
Greensburg, PA 15601  
(724) 838-1290

Indiana Co. Community Action Program  
827 Water Street, Box 187  
Indiana, PA 15701  
(724) 465-2657  
FAX (412) 465-5118

Keystone Economic Development  
Corporation  
1954 Mary Grace Lane  
Johnstown, PA 15901  
(814) 535-6556  
FAX (814) 539-1686

CCCS of Western PA  
219-A College Park Plaza  
Johnstown PA 15904  
(814) 539-6335

**JEFFERSON COUNTY**  
John F. Kennedy Center, Inc.  
2021 East 20th Street  
Erie, PA 16510  
(814) 898-0400  
FAX (814) 898-1243

CCCS of Western Pennsylvania, Inc.  
YMCA Building  
339 North Washington Street  
Butler, PA 16001  
(724) 282-7812

Indiana County Community Action  
Program  
827 Water Street, Box 187  
Indiana, PA 15701  
(724) 465-2657  
FAX (412) 465-5118

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NATIONAL CITY

NO. 1219 P. 9

CCCS of Western Pennsylvania, Inc.  
217 E. Plank Road  
Altoona PA 16602  
(814) 944-8100  
FAX (814) 944-5747

Weatherization Office  
917 Mifflin Street  
Huntingdon, PA 16652  
(814) 643-2343

**LACKAWANNA COUNTY**  
CCCS of Northeastern Pennsylvania  
31 W. Market Street  
P.O. Box 1127  
Wilkes-Barre, PA 18702  
(570) 821-0837 OR 1-800-922-9537  
FAX (570) 821-1785

1400 Abington Executive Park, Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 or 800-955-9537  
FAX (570) 587-9134/9135

**LANCASTER COUNTY**  
Community Housing Counselors, Incorporated  
P.O. Box 244  
Kennett Square, PA 19348  
(215) 444-3662  
FAX (215) 444-3178

CCCS of Lehigh Valley  
3671 Crescent Court East  
Whitehall, PA 18052  
(215) 821-4011 1-800-220-2733  
(717) & (814) ONLY  
FAX (215) 821-8932

CCCS of Western Pennsylvania, Inc.  
912 South George Street  
York, PA 17403  
(717) 846-4176

Tabor Community Services, Inc.  
439 E. King Street  
Lancaster, PA 17602  
(717) 397-5182 OR 1-800-788-5062  
FAX (717) 399-4127

**LAWRENCE COUNTY**  
CCCS of Western Pennsylvania  
1st Federal Plaza-Suite 406  
North Mill Street  
New Castle, PA 16101  
(724) 652-8074

312 Chestnut Street, Suite 227  
Meadville PA 16335  
(814) 333-6570  
Shenango Valley Urban League, Inc.

601 Indiana Avenue  
Farrell, PA 16121  
(724) 981-5310

Housing Opportunities of Beaver County  
650 Corporation St., Suite 207  
Beaver, PA 15009  
(724) 728-7202  
FAX (412) 728-7202

**LEBANON COUNTY**  
Economic Opportunity Cabinet of Schuylkill County  
225 North Centre Street  
Pottsville, PA 17901  
(570) 622-1995  
FAX (570) 622-0429

Tabor Community Services, Inc.  
439 E. King Street  
Lancaster, PA 17602  
(717) 397-5182 OR 1-800-788-5062  
FAX (717) 399-4127

**LEBANON COUNTY**

CCCS of Lehigh Valley  
3671 Crescent Court East  
Whitehall, PA 18052  
(610) 821-4011 OR 1-800-220-2733  
(570) & (814) ONLY  
FAX (610) 821-8932  
Economic Opportunity Cabinet of Schuylkill County  
225 North Centre Street  
Pottsville, PA 17901  
(570) 622-1995  
FAX (570) 622-0429

**LUZERNE COUNTY**

CCCS of Northeastern Pennsylvania  
31 W. Market Street  
P.O. Box 1127  
Wilkes-Barre, PA 18702  
(570) 821-0837 OR 1-800-922-9537  
FAX (570) 821-1785

1400 Abington Executive Park  
Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 or 800-922-9537  
FAX (570) 587-9134/9135

Comm. on Econ Opportunity of Luzerne County  
163 Amber Lane  
Wilkes-Barre, Pennsylvania 18702  
(570) 826-0510 OR 1-800-822-0359  
FAX (570) 829-1865—CALL BEFORE  
FAXING  
(570) 455-4994 HAZELTON  
FAX (570) 455-5831—CALL BEFORE  
FAXING  
(570) 836-4090 TUNKHANNOCK

EOC of Schuylkill County  
225 North Centre Street  
Pottsville, PA 17901  
(570) 622-1995  
FAX (570) 622-0429

**LYCOMING COUNTY**

CCCS of Northeastern Pennsylvania  
31 W. Market Street  
P.O. Box 1127  
Wilkes-Barre, PA 18702  
(570) 821-0837 OR 1-800-922-9537  
FAX (570) 821-1785

1400 Abington Executive Park  
Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 or 800-922-9537  
FAX (570) 587-9134/9135

201 Basin Street  
Williamsport, PA 17703  
(570) 323-6627  
FAX (570) 323-6626

Lycoming-Clinton Counties Commission For Community Action (STEP)  
2138 Lincoln Street  
P.O. Box 1328  
Williamsport, PA 17703  
(570) 326-0587  
FAX (570) 322-2197

**MCKEAN COUNTY**

John F. Kennedy Center, Inc.  
2021 East 20th Street  
Erie, PA 16510  
(814) 898-0400  
FAX (814) 898-1243

Northern Tier Community Action Corp  
P.O. Box 389  
135 W. 4th Street  
Emporium, PA 15834  
(814) 486-1161  
FAX (814) 486-0825

**MERCER COUNTY**

Shenango Valley Urban League, Inc.  
601 Indiana Avenue  
Farrell, PA 16121  
(724) 981-5310

CCCS of Western Pennsylvania, Inc.  
YMCA Building  
339 North Washington Street  
Butler, PA 16001  
(724) 282-7812

**MUFLIN COUNTY**  
CCCS of Western Pennsylvania, Inc.  
217 E. Plank Road  
Altoona PA 16602  
(814) 944-8100  
FAX (814) 944-5747

Weatherization Office  
917 Mifflin Street  
Huntingdon, PA 16652  
(814) 643-2343

CCCS of Northeastern PA  
1631 S. Atherton St.  
Suite 100  
State College PA 16801  
(814) 238-3668  
FAX (814) 238-3669

**MONROE COUNTY**  
CCCS of Northeastern Pennsylvania  
31 W. Market Street  
P.O. Box 1127  
Wilkes-Barre, PA 18702  
(570) 821-0837 OR 1-800-922-9537  
FAX (570) 821-1785

1400 Abington Executive Park  
Suite 1  
Clarks Summit PA 18411  
(570) 587-9163 or 800-922-9537  
FAX (570) 587-9134/9135  
9 South 7th Street  
Stroudsburg PA 18360  
(570) 420-8980 or 800-922-9537  
FAX (570) 420-8981

Comm on Econ Opp of Luzerne County  
163 Amber Lane  
Wilkes-Barre, PA 18702  
(570) 826-0510 OR 1-800-822-0359  
FAX (570) 829-1865—CALL BEFORE  
FAXING  
(570) 455-4994 HAZELTON  
FAX (570) 455-5831—CALL BEFORE  
FAXING  
(570) 836-4090 TUNKHANNOCK

**MONTGOMERY COUNTY**  
Acorn Housing Corporation  
848 North Broad Street  
Philadelphia, PA 19130  
(215) 765-1221  
FAX (215) 765-1427

Northwest Counseling Service  
5001 N. Broad Street  
Philadelphia, PA 19141  
(215) 324-7500  
FAX (215) 324-8753

CCCS of Delaware Valley  
Norristown Business Center  
190 W. Germantown Pike, Suite 140  
Norristown PA 19401  
(215) 563-5865

Community Action Development Comm  
701 DeKalb Street  
Norristown, PA 19401  
(610) 277-6363  
FAX (610) 277-2123

CCCS of Delaware Valley  
1515 Market Street, Suite 1325  
Philadelphia, PA 19107  
(215) 563-5665  
FAX (215) 864-2666

Community Housing Counselors Inc  
P.O. Box 244  
Kennett Square, PA 19348  
(215) 444-3682  
FAX (215) 444-8243

Media Fellowship House  
302 S. Jackson Street  
Media, PA 19063  
(610) 565-0846

Phila Council For Community Adv.  
100 North 17th Street, Suite 600  
Philadelphia, PA 19103  
(215) 567-7803  
FAX (215) 963-9941

American Credit Counseling Instil  
845 Coates St.  
Coatesville, PA 19320  
(888) 212-6741

144 E. Dekab Pike  
King of Prussia PA 19406  
(610) 971-2210  
FAX (610) 265-4814

755 York Rd., Suite 103  
Warrington PA 18974  
(215) 444-9429  
FAX (215) 956-6344

**MONTOUR COUNTY**  
CCCS of Northeastern Pennsylvania  
31 W. Market Street  
P.O. Box 1127  
Wilkes-Barre, PA 18702  
(570) 821-0837 OR 1-800-922-9537  
FAX (570) 821-1785

1400 Abington Executive Park, Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 or 800-922-9537  
FAX (570) 587-9134/9135

**NORTHAMPTON COUNTY**  
CCCS of Lehigh Valley  
3671 Crescent Court East  
Whitehall, PA 18052  
(610) 821-4011 OR 1-800-220-2733  
(717) & (814) ONLY  
FAX (610) 821-8932

**NORTHUMBERLAND COUNTY**  
CCCS of Northeastern Pennsylvania  
31 W. Market Street  
P.O. Box 1127  
Wilkes-Barre, PA 18702  
(570) 821-0837 OR 1-800-922-9537  
FAX (570) 821-1785

1400 Abington Executive Park  
Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 or 800-922-9537  
FAX (570) 587-9134/9135

201 Basin Street  
Williamsport, PA 17703  
(570) 323-6627  
FAX (570) 323-6626

Er. Economic Opportunity Cabinet of Schuylkill County  
225 North Centre Street  
Pottsville, PA 17901  
(570) 622-1995  
FAX (570) 622-0429

**PERRY COUNTY**  
CCCS of Western Pennsylvania, Inc.  
2000 Linglestown Rd.  
Harrisburg, PA 17102  
(717) 541-1757  
FAX (717) 541-4670

Financial Counseling Services of Franklin  
31 West 3rd Street  
Waynesboro, PA 17268  
(717) 762-3285

Urban League of Metropolitan Harrisburg  
2107 N. 6th Street  
Harrisburg, PA 17101  
(717) 214-5826

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NATIONAL CITY

NO. 1219 P. 10

917 Mifflin Street  
Huntingdon, PA 16552  
(814) 643-2343

YWCA of Carlisle  
301 G Street  
Carlisle, PA 17013  
(717) 243-3818  
FAX (717) 243-3948

Community Action Commission of  
The Capital Region  
1514 Derry Street  
Harrisburg PA 17104  
(717) 232-9757  
FAX (717) 234-2227

PHILADELPHIA COUNTY  
Acorn Housing Corporation  
846 North Broad Street  
Philadelphia, PA 19130  
(215) 765-1221  
FAX (215) 765-1427

Northwest Counseling Service  
5001 N Broad Street  
Philadelphia PA 19141  
(215) 324-7500  
FAX (215) 324-8753

CCCS of Delaware Valley  
1515 Market Street, Suite 1325  
Philadelphia, PA 19107  
(215) 563-5665  
FAX (215) 864-2666

HACE  
167 W. Allegheny, 2nd Fl  
Philadelphia, PA 19140  
(215) 426-8025  
FAX (215) 426-9122

Housing Association of Delaware  
Valley  
1500 Walnut Street, Suite 601  
Philadelphia, PA 19102  
(215) 545-6010  
FAX (215) 790-9132

Media Fellowship House  
302 S. Jackson Street  
Media PA 19063  
(610) 565-0846  
FAX (610) 565-0567

Housing Association of Delaware  
Valley  
658 North Wall Street  
Philadelphia, PA 19123  
(215) 978-0224  
FAX (215) 765-7614

PCCA  
100 North 17TH Street, Suite 600  
Philadelphia, PA 19103  
(215) 567-7803  
FAX (215) 963-9941

Comm Devel. Corp of Frankford Group  
Ministry  
4520 Griscom Street  
Philadelphia, PA 19124  
(215) 744-2990  
FAX (215) 744-2012

American Credit Counseling Institute  
845 Coates St  
Coatesville PA 19320  
(888) 212-6741

144 E Dekalb Pike  
King of Prussia PA 19406  
610-971-2210  
610-971-2210

755 York Rd, Suite 103  
Warminster PA 18974  
FAX(215) 956-6344

PA NE COUNTY

CCCS of Northeastern Pennsylvania  
31 W. Market Street, POB 1127  
Wilkes-Barre, PA 18702  
(570) 821-0837 OR 1-800-922-9537  
FAX (570) 821-1785

1400 Abington Executive Park, Suite 1  
Clarks Summit PA 18411  
(570) 587-9163 or 800-922-9537  
FAX (570) 587-9134/9135

9 South 7th Street  
Stroudsburg PA 18360  
(570) 420-8980 or 800-922-9537  
FAX (570) 420-8981

POTTER COUNTY

Northern Tier Community Action Corp.  
135 West 4th Street  
Emporium, PA 15834  
(814) 486-1161  
FAX (814) 486-0825

SCHUYLKILL COUNTY  
Budget Counseling Center  
247 North Fifth Street  
Reading, PA 19601  
(610) 375-7866  
FAX (610) 375-7830

Econ Opport Cabinet of Schuylkill Co  
225 N. Centre Street  
Pottsville, PA 17901  
(570) 622-1995  
FAX (570) 622-0429

Commission on Econ Opportunity of Luz  
Co.  
163 Amber Lane  
Wilkes-Barre PA 18702  
(570) 826-0510 OR 1-800-822-0359  
FAX (570) 829-1665- CALL  
BEFORE FAXING  
(570) 455-4994 HAZELTON  
FAX (570) 455-5631- CALL BEFORE  
FAXING  
(570) 836-4090 TUNKHANNOCK

CCCS of Lehigh Valley  
P.O. Box A  
Whitehall PA 18052  
(610) 821-4011  
FAX (610) 821-8932

SNYDER COUNTY

CCCS of Western Pennsylvania, Inc  
2000 Linglestown Road  
Harrisburg, PA 17102  
(717) 541-1757  
FAX (717) 541-4670

Urban League of Metropolitan  
Harrisburg  
2107 N. 6th Street  
Harrisburg PA 17101  
17101  
(717) 541-1757  
FAX (717) 234-9459

Community Action Comm of the Capital  
Region

1514 Derry Street  
Harrisburg PA 17104  
(717) 232-9757  
FAX (717) 234-2227

SOMERSET COUNTY

Bedford-Fulton Housing Services  
R.D.#1, Box 384  
Everett, PA 15537  
(814) 623-9129  
FAX (814) 623-7187

Bedford-Fulton Housing Services  
1954 Mary Grace Lane  
Johnstown, PA 15901  
FAX (814) 539-1698

CCCS of Western Pennsylvania, Inc.  
1 North Gate Square  
#2 Garden Center Drive  
Greensburg, PA 15601  
(724) 838-1290

CCCS of Western Pennsylvania, Inc.  
219-A College Park Plaza  
Johnstown PA 15904  
(814) 539-6335

Tableland Services Inc.  
535 East Main Street  
Somerset, PA 15501  
(814) 445-9628 - 1-800-452-0148  
FAX (814) 443-3890

SULLIVAN COUNTY  
CCCS of Northeastern Pennsylvania  
1400 Abington Executive Park, Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 OR 1-800-922-9537  
FAX (570) 587-9134/9135

31 W. Market St.  
Wilkes-Barre PA 18702  
(570) 821-0837 or 800-922-9537  
FAX (570) 821-1785

The Trehab Center of Northeastern PA  
185 Elmira Street, P.O. Box 218  
Troy, PA 16947  
(570) 297-2101  
FAX (570) 297-2799

German Street, P.O. Box 389  
FAX(570)297-2799  
(570) 928-9668  
FAX (570) 928-8144

17 Crafton Street  
Wellsboro, PA 16901  
(570) 724-5252  
FAX (570) 724-5783

931 Main Street  
Honesdale PA 18431  
(570) 253-8941  
FAX (570) 253-4817

103 Warren Street, P.O. Box 709  
Tunkhannock, PA 18657  
(570) 836-6840  
FAX (570) 836-6332

7 Lake Avenue, Box 339  
Montrose, PA 18801  
(570) 278-3338 or 1-800-982-4045  
FAX (570) 278-1889

7 Lake Avenue, Box 339  
Montrose, PA 18801  
(570) 278-3338 or 1-800-982-4045  
FAX (570) 278-1889

TIoga County  
CCCS of Northeastern Pennsylvania  
1400 Abington Executive Park, Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 OR 1-800-922-9537  
FAX (570) 587-9134/9135

31 W. Market St.  
Wilkes-Barre PA 18702  
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FAX (570) 821-1785

The Trehab Center of Northeastern PA  
185 Elmira Street, P.O. Box 218  
Troy, PA 16947  
(570) 297-2101  
FAX (570) 297-2799

German Street, P.O. Box 389  
FAX(570)297-2799  
(570) 928-9668  
FAX (570) 928-8144

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Wellsboro, PA 16901  
(570) 724-5252  
FAX (570) 724-5783

931 Main Street  
Honesdale PA 18431  
(570) 253-8941  
FAX (570) 253-4617

103 Warren Street, P.O. Box 709  
Tunkhannock, PA 18657  
(570) 836-6840  
FAX (570) 836-6332

7 Lake Avenue, Box 339  
Montrose, PA 18801  
(570) 278-3338 or 1-800-982-4045  
FAX (570) 278-1889

UNION COUNTY  
Lycoming-Clinton Co Comm For Co  
Action (STEP)  
2138 Lincoln Street, P.O. Box 1328  
Williamsport, PA 17703  
(570) 326-0587  
FAX (717) 322-2197

CCCS of Western Pennsylvania, Inc  
217 E. Plank Road  
Altoona PA 16602  
(814) 944-8100  
(814) 944-8100

CCCS of Northeastern Pennsylvania  
1400 Abington Executive Park, Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 OR 1-800-922-9537  
FAX (570) 587-9134/9135

31 W. Market St.  
Wilkes-Barre PA 18702  
(570) 821-0837 or 800-922-9537  
FAX (570) 821-1785

201 Basin Street  
Williamsport, PA 17703  
(570) 323-6627  
FAX (570) 323-6626

VENANGO COUNTY  
Greater Erie Community Action  
Committee  
18 West 9TH Street  
Erie, PA 16501  
(814) 459-4581  
FAX (814) 456-0161

John F. Kennedy Center, Inc  
2021 East 20th Street  
Erie, PA 16510  
(814) 898-0400  
FAX (814) 898-1243

OCT. 17. 2002 P 10:39AM

TMICA Building  
339 North Washington Street  
Butler, PA 16001  
(412) 282-7812

**WARREN COUNTY**  
Booker T. Washington Center  
1720 Holland Street  
Erie, PA 16503  
(814) 453-5744  
FAX (814) 453-5749

Greater Erie Community Action Committee  
18 West 9TH Street  
Erie, PA 16501  
(814) 459-4581  
FAX (814) 456-0161

Warren-Forrest Counties Economic Opportunity Council  
1209 Pennsylvania Avenue, West  
P.O. Box 547

Warren, PA 16365  
(814) 726-2400  
FAX (814) 723-0510

**WASHINGTON COUNTY**  
Action Housing, Inc.  
425 6th Avenue, Suite 950  
Pittsburgh, PA 15219  
(412) 391-1956 or (412) 281-2102  
FAX (412) 391-4512

Community Action Southwest  
22 West High Street  
Waynesburg, PA 15370  
(724) 852-2893

CCCS of Western Pennsylvania, Inc.  
1 North Gate Square  
#2 Garden Center Drive  
Greensburg, PA 15601

CCCS of Western Pennsylvania, Inc.  
53 N. College Street  
Washington PA 15301  
(724) 222-8292

Housing Opportunities, Inc  
133 Seventh Street  
McKeesport, PA 15132  
(412) 664-1590  
FAX (412) 664-0873

Mon-Valley Unemployed Committee  
120 E. 9th Avenue  
Homestead, PA 15120  
(412) 462-9962  
FAX (412) 462-996

Credit Counselors of PA  
401 Wood Street, Suite 906  
Pittsburgh, PA 15222  
(412) 338-9954 or 1(800) 737-2933  
FAX (412) 338-9963

**WAYNE COUNTY**  
CCCS of Northeastern Pennsylvania  
1400 Abington Executive Park, Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 OR 1-800-922-9537  
FAX (570) 587-9134/9135

31 W. Market St.  
Wilkes-Barre, PA 18702  
(570) 821-0837 or 800-922-9537  
FAX (570) 821-1785

9 South 7th Street  
Stroudsburg PA 18360  
(570) 420-8980 or 800-922-9537  
FAX (570) 420-8981

The Trehab Center of Northeastern PA  
185 Elmira Street, P.O. Box 218  
Troy, PA 16947  
(570) 297-2101  
FAX (570) 297-2799

### NATIONAL CITY

FAX (570) 297-2799  
(570) 928-9668  
FAX (570) 928-8144

17 Crafton Street  
Wellsville, PA 16901  
(570) 724-5252  
FAX (570) 724-5783

931 Main Street  
Honesdale PA 18431  
(570) 253-8941  
FAX (570) 253-4817

103 Warren Street, P.O. Box 709  
Tunkhannock, PA 18657  
(570) 836-6840  
FAX (570) 836-6332

7 Lake Avenue, Box 339  
Montrose, PA 18801  
(570) 278-3338 or 1-800-982-4045  
FAX (570) 278-1889

### WESTMORELAND COUNTY

Action Housing, Inc.  
425 6th Avenue, Suite 950  
Pittsburgh, PA 15219  
(412) 391-1956 or (412) 281-2102  
FAX (412) 391-4512

Community Action Southwest  
22 West High Street  
Waynesburg, PA 15370  
(724) 852-2893

CCCS of Western Pennsylvania, Inc.  
1 North Gate Square  
#2 Garden Center Drive  
Greensburg, PA 15601  
(724) 638-1290

CCCS of Western Pennsylvania, Inc  
199 Edison Street  
Uniontown PA 15401  
(724) 439-8939

Housing Opportunities, Inc  
133 Seventh Street  
McKeesport, PA 15132  
(412) 664-1590  
FAX (412) 664-0873

Mon-Valley Unemployed Committee  
120 E. 9th Avenue  
Homestead, PA 15120  
(412) 462-9962  
FAX (412) 462-996

Indiana Co Community Action Program  
827 Water Street, Box 187  
Indiana, PA 15701  
(724) 465-2657  
FAX (724) 465-5118

Keystone Economic Development Corporation  
1954 Mary Grace Lane  
Johnstown, PA 15901  
(814) 535-6556  
FAX (814) 539-1888

Tableland Services Inc.  
535 East Main Street  
Somerset, PA 15501  
(814) 445-9628  
1-800-452-0148  
FAX (814) 443-3690

Credit Counselors of PA  
401 Wood Street, Suite 906  
Pittsburgh, PA 15222  
(412) 338-9954 or 1(800) 737-2933  
FAX (412) 338-9963

### WYOMING COUNTY

Common Economics Opportunity of Luzerne Co

163 Amber Lane  
Wilkes-Barre, Pennsylvania 18701  
(570) 826-0510 OR 1-800-622-0359  
FAX (570) 829-1665—CALL BEFORE  
FAXING  
(570) 455-4994 HAZELTON  
FAX (570) 455-5631—CALL BEFORE  
FAXING  
(570) 836-4090 TUNKHANNOCK

CCCS of Northeastern Pennsylvania  
1400 Abington Executive Park, Suite 1  
Clarks Summit, PA 18411  
(570) 587-9163 OR 1-800-922-9537  
FAX (570) 587-9134/9135

91 W. Market St.  
Wilkes-Barre PA 18702  
(570) 821-0837 or 800-922-9537  
FAX (570) 821-1785

The Trehab Center of Northeastern PA  
185 Elmira Street, P.O. Box 218  
Troy, PA 16947  
(570) 297-2101  
FAX (570) 297-2799

German Street, P.O. Box 389  
FAX (570) 297-2799  
(570) 928-9668  
FAX (570) 928-8144

17 Crafton Street  
Wellsville, PA 16901  
(570) 724-5252  
FAX (570) 724-5783

931 Main Street  
Honesdale PA 18431  
(570) 253-8941  
FAX (570) 253-4817

103 Warren Street, P.O. Box 709  
Tunkhannock, PA 18657  
(570) 836-6840  
FAX (570) 836-6332

7 Lake Avenue, Box 339  
Montrose, PA 18801  
(570) 278-3338 or 1-800-982-4045  
FAX (570) 278-1889

**YORK COUNTY**  
American Red Cross—Hanover Chapter  
529 Carlisle Street  
Hanover, Pennsylvania 17331  
(717) 637-3768  
FAX (717) 637-3294

Housing Council of York  
118 North George Street  
York, PA 17401  
(717) 854-1541  
FAX (717) 845-7934

CCCS of Western Pennsylvania, Inc  
2000 Unglestown Road  
Harrisburg, PA 17102  
CCCS of Western Pennsylvania, Inc

912 South George Street  
York, PA 17403  
(717) 846-4176

Adams County Housing Authority  
139-143 Carlisle St  
Gettysburg PA 17325  
(717) 334-1518  
FAX (717) 334-8326

V E R I F I C A T I O N

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



Mark J. Udren, ESQUIRE  
UDREN LAW OFFICES, P.C.

Date: 02/03/2005

Time: 09:29 AM

Page 1 of 1

**Clearfield County Court of Common Pleas**

User: BANDERSON

**ROA Report**

**Case: 2004-01792-CD**

**Current Judge: Fredric Joseph Ammerman**

**National City Mortgage Co. vs. Bradley Wilson, Bernadette Wilson**

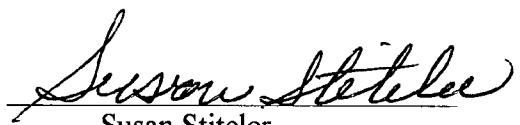
**Mortgage Foreclosures**

Date		Judge
11/10/2004	Filing: Civil Complaint Mortgage Foreclosure (Brady Township) Paid by: Udren Law Offices, PC Receipt number: 1890221 Dated: 11/10/2004 Amount: \$85.00 (Check) 2 Cert. to Sheriff Property located in Brady Township	No Judge ✓
12/16/2004	Sheriff Return, Nov. 15, 2004 served Complaint In Mortgage Foreclosure on Bernadette Wilson and Bradley Wilson, Defendants. So Answers Chester A. Hawkins, Sheriff, by s/Marilyn Hamm	No Judge ✗
12/23/2004	Filing: Judgment Paid by: Udren, Mark J. Esq (attorney for National City Mortgage Co.) Receipt number: 1892519 Dated: 12/23/2004 Amount: \$20.00 (Check) Judgment entered against Defs. in the amount \$73,196.69 Notice to Def. Stmt. to Atty. Filing: Writ of Execution / Possession Paid by: Udren, Mark J. Esq (attorney for National City Mortgage Co.) Receipt number: 1892519 Dated: 12/23/2004 Amount: \$20.00 (Check) Wirit entered against Defs. in the amount \$73,196.69 1CC and 6 Writs to Shff.	No Judge ✗
01/13/2005	Motion to Strike Judgment, filed by Atty. Bowers 1 Cert. to Atty.	No Judge ✓
01/17/2005	Rule To Show Cause Order: AND NOW, upon consideration of Defendants' Fredric Joseph Ammerman Motion to Strike Judgment, IT IS HEREBY ORDERED that Plaintiff file written response within 20 days of this Order of Court. Oral argument on said Motion and response is scheduled for the 10th day of Feb., 2005 at 1:30 p.m. BY THE COURT: /s/ Fredric J. Ammerman, President Judge. 1CC Atty Bowers	✓
01/26/2005	Certificate of Service, certified copy of Motion to Strike Judgment with attached Order of Court, upon Mark J. Udren, Esquire, on Jan. 25, 2005. Filed by s/ S. Casey Bowers. No CC	Fredric Joseph Ammerman ✓

**VERIFICATION**

I, SUSAN STITELER, Assistant Vice President of FIRST COMMONWEALTH BANK, formerly DEPOSIT BANK, being duly authorized to make this verification, have read the foregoing Complaint. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification is made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.



Susan Stiteler  
Susan Stiteler

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

**NATIONAL CITY MORTGAGE CO.**

**VS.**

**WILSON, BRADLEY & BERNADETTE**

**COMPLAINT IN MORTGAGE FORECLOSURE**

**Sheriff Docket #** 16603

**04-1792-CD**

**SHERIFF RETURNS**

NOW NOVEMBER 15, 2004 AT 10:00 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON BERNADETTE WILSON, DEFENDANT AT RESIDENCE, RD#2 BOX 454 (OKLAHOMA SALEM ROAD) A/K/A 1052 LINES ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BERNADETTE WILSON A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: DEHAVEN/COUDRIET

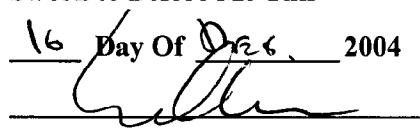
NOW NOVEMBER 15, 2004 AT 10:00 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON BRADLEY WILSON, DEFENDANT AT RESIDENCE, RD#2 BOX 454 (OKLAHOMA SALEM ROAD) A/K/A 1052 LINES ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BERNADETTE WILSON, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: DEHAVEN/COUDRIET

**Return Costs**

<b>Cost</b>	<b>Description</b>
<b>38.25</b>	<b>SHERIFF HAWKINS PAID BY: ATTY CK# 22783</b>
<b>20.00</b>	<b>SURCHARGE PAID BY: ATTY CK# 22784</b>

**Sworn to Before Me This**

16 Day Of Dec, 2004  


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

**So Answers,**

  
by   
Chester A. Hawkins  
Sheriff

**FILED**  
EOK  
DEC 16 2004  
8/2/04  
William A. Shaw  
Prothonotary/Clerk of Courts

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

v.

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2004-1792-CD

FILED *Atty*  
*m/11/12 6:11 pm*  
DEC 23 2004 20:00

✓ William A. Shaw  
Prothonotary/Clerk of Courts  
Notice to Defs.  
Statement to Atty

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

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) **Bradley Wilson and Bernadette Wilson** 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	\$72,369.87
Interest Per Complaint	618.30
From 11/7/04 to 12/21/04	
Late charges per Complaint	47.68
From 11/7/04 to 12/21/04	
Escrow payment per Complaint	<u>160.84</u>
From 11/7/04 to 12/21/04	
<b>TOTAL</b>	<b><u>\$73,196.69</u></b>

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

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE  
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: December 23, 2004

*William A. Shaw*  
PRO PROTHY

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co., s/b/m/t  
National City Bank of Pennsylvania  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Bradley Wilson  
Bernadette Wilson  
Defendant(s)

NO. 2004-1792-CD

TO: Bradley Wilson  
1052 Lines Road  
DuBois, PA 15801

DATE of Notice: December 8, 2004

**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.

LAWYER REFERRAL SERVICE  
David S. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext. 5982

**NOTIFICACION IMPORTANTE**

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUIRIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO IMMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASSISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL  
LAWYER REFERRAL SERVICE  
David S. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext. 5982

NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

/s/

Mark J. Udren, Esquire  
Woodcrest Corporate Center  
111 Woodcrest Road, Suite 200  
Cherry Hill, New Jersey 08003-3620

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co., s/b/m/t  
National City Bank of Pennsylvania  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Bradley Wilson  
Bernadette Wilson  
Defendant(s)

NO. 2004-1792-CD

TO: Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801

DATE of Notice: December 8, 2004

**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.

LAWYER REFERRAL SERVICE  
David S. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext. 5982

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SERVICIO DE REFERENCIA LEGAL  
LAWYER REFERRAL SERVICE  
David S. Meholic  
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Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext. 5982

NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

/s/

Mark J. Udren, Esquire  
Woodcrest Corporate Center  
111 Woodcrest Road, Suite 200  
Cherry Hill, New Jersey 08003-3620

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-482-6900

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

v.  
Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

NO. 2004-1792-CD

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF OHIO :  
COUNTY OF MONTGOMERY : SS

THE UNDERSIGNED being duly sworn, deposes and says that the averments herein are based upon investigations made and records maintained by us either as Plaintiff or as servicing agent of the Plaintiff herein and that the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended, and that the age and last known residence and employment of each Defendant are as follows:

Defendant: Bradley Wilson  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

Defendant: Bernadette Wilson  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

Sworn to and subscribed  
before me this 16th day  
of November, 2004.

Teresa L. Douglas  
Notary Public

Laura Cauper  
Name: Laura Cauper  
Title: Authorized Signer  
Company: National City Mortgage Co.



TERESA L. DOUGLAS, Notary Public  
In and for the State of Ohio  
My Commission Expires Jan. 29, 2009

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff  
v.  
Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2004-1792-CD

TO: Bradley Wilson  
1052 Lines Road  
DuBois, PA 15801

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Prothonotary 12/23/04

- Judgment by Default
- Money Judgment
- Judgment in Replevin
- Judgment for Possession
- Judgment on Award of Arbitration
- Judgment on Verdict
- Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-669-5400.

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff  
v.  
Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE  
NO. 2004-1792-CD

TO: Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Prothonotary 12/23/04

- Judgment by Default  
 Money Judgment  
 Judgment in Replevin  
 Judgment for Possession  
 Judgment on Award of Arbitration  
 Judgment on Verdict  
 Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire  
At this telephone number: 856-669-5400.

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

National City Mortgage Co.  
Plaintiff(s)

No.: 2004-01792-CD

Real Debt: \$73,196.69

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Bradley Wilson  
Bernadette Wilson  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: December 23, 2004

Expires: December 23, 2009

Certified from the record this 23rd day of December, 2004

---

William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

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

---

Plaintiff/Attorney

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

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff  
v.

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2004-1792-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE SHERIFF:

Issue Writ of Execution in the above matter:

Amount due \$73,196.69

Interest From 12/22/04  
to Date of Sale \_\_\_\_\_  
Per diem @ \$13.74 \_\_\_\_\_

(Costs to be added) \$ \_\_\_\_\_

625.00 Prothonotary costs

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

FILED *CC-10 Writs*  
*11-27-04 to Shaff*  
*DEC 23 2004* *Atty pd. 20.00*  
William A. Shaw  
Prothonotary/Clerk of Courts

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co., s/b/m/t  
National City Bank of Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

## MORTGAGE FORECLOSURE

Plaintiff  
v.

NO. 2004-1792-CD

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801

Defendant(s)

AFFIDAVIT PURSUANT TO RULE 3129.1

National City Mortgage Co., s/b/m/t National City Bank of Pennsylvania, Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praeclipe for the Writ of Execution was filed the following information concerning the real property located at: RD. 2, Box 454 (Oklahoma Salem Road) a/k/a 1052 Lines Road, DuBois (Brady Twp.), PA 15801

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

Bradley Wilson 1052 Lines Road  
DuBois, PA 15801

Bernadette Wilson 1052 Lines Road  
DuBois, PA 15801

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

SAME AS #1 ABOVE

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

None

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

Name \_\_\_\_\_ Address \_\_\_\_\_

Plaintiff herein

See Caption above.

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

Name \_\_\_\_\_ Address \_\_\_\_\_

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 \_\_\_\_\_ Address \_\_\_\_\_

Real Estate Tax Dept.

1 North Second St., Ste. 116  
Clearfield, PA 16830

### Domestic Relations Section

1 North Second St., Ste. 116  
Clearfield, Pa 16830

Commonwealth of PA,  
Department of Revenue

Bureau of Compliance, Dept. 280946  
Harrisburg, PA 17128-0946

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 \_\_\_\_\_ Address \_\_\_\_\_

### Tenants/Occupants

RD. 2, Box 454 (Oklahoma Salem Road)  
a/k/a 1052 Lines Road  
DuBois (Brady Twp.), PA 15801

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.

DATED: December 21, 2004

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

Plaintiff

v.

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801

NO. 2004-1792-CD

Defendant(s)

C E R T I F I C A T E

Mark J. Udren, 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 insured mortgage
- Non-owner occupied
- Vacant
- Act 91 procedures have been fulfilled.
- Over 24 months delinquent.

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

UDREN LAW OFFICES, P.C.  
Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

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

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

v.

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2004-1792-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

To satisfy the judgment, interest and costs in the above matter, you are directed to levy upon and sell the following described property:

RD. 2, Box 454 (Oklahoma Salem Road)  
a/k/a 1052 Lines Road  
DuBois (Brady Twp.), PA 15801  
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$73,196.69

Interest From 12/22/04 \_\_\_\_\_  
to Date of Sale \_\_\_\_\_  
Per diem @\$13.74

(Costs to be added) \$ \_\_\_\_\_ 125.00 Prothonotary costs

By Willie M. Hagan  
Prothonotary  
Clerk

Date 12/23/04

COURT OF COMMON PLEAS  
NO. 2004-1792-CD

National City Mortgage Co., s/b/m/t National City Bank of  
Pennsylvania  
vs.  
Bradley Wilson  
Bernadette Wilson

WRIT OF EXECUTION

REAL DEBT \$ 73,196.69

INTEREST \$ \_\_\_\_\_  
from 12/22/04 to \_\_\_\_\_  
Date of Sale \_\_\_\_\_  
Per diem @\$13.74

COSTS PAID:  
PROTHY \$ 125.00

SHERIFF \$ \_\_\_\_\_

STATUTORY \$ \_\_\_\_\_

COSTS DUE PROTHY. \$ \_\_\_\_\_

PREMISES TO BE SOLD:  
RD. 2, Box 454 (Oklahoma Salem Road)  
a/k/a 1052 Lines Road  
DuBois (Brady Twp.), PA 15801

Mark J. Udren, ESQUIRE  
UDREN LAW OFFICES, P.C.  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
(856) 669-5400

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATE IN BRADY TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO WIT:

BEGINNING AT A CORNER IN THE CENTER OF TOWNSHIP ROAD ROUTE NO. T-370, SAID CORNER BEING THE NORTHWEST CORNER OF THE LAND OF EDWARD SWANSON, (THE SAME LAND BEING ORIGINALLY A PART OF THE TRACT OF WHICH THIS LOT IS A PART), AND ALSO BEING THE SOUTHWEST CORNER OF THE TRACT OR LOT HEREIN DESCRIBED; THENCE BY THE CENTERLINE OF SAID TOWNSHIP ROAD, NORTH  $6^{\circ} 47'$  WEST FOR A DISTANCE OF 208.1 FEET; AND STILL BY SAID CENTERLINE OF SAID TOWNSHIP ROAD, NORTH  $16^{\circ} 32'$  WEST FOR A DISTANCE OF 135 FEET TO A CORNER AT THE INTERSECTION OF THE CENTERLINES OF THE SAID TOWNSHIP ROAD AND ANOTHER DIRT ROAD, NOW PURPORTED TO BE A TOWNSHIP ROAD; THENCE BY THE CENTERLINE OF SAID DIRT ROAD OR TOWNSHIP ROAD, SOUTH  $79^{\circ} 23'$  EAST FOR A DISTANCE OF 225.7 FEET TO A CORNER IN THE CENTERLINE OF SAID ROAD; THENCE LEAVING THE SAID DIRT ROAD OR TOWNSHIP ROAD AND THROUGH THE LANDS OF JACK LINES, ET UX. FOR A NEW LINE, SOUTH  $3^{\circ} 41'$  EAST, PASSING THROUGH AN IRON PIN AT 19.8 FEET AND CONTINUING ON FOR A TOTAL DISTANCE OF 272.0 FEET TO AN IRON PIN, THE SAME IRON PIN CORNER BEING THE NORTHEAST CORNER OF LAND OF EDWARD SWANSON AFOREMENTIONED; THENCE BY THE SAID EDWARD SWANSON, SOUTH  $83^{\circ} 49'$  WEST FOR A DISTANCE OF 176 FEET TO AN IRON PIN AND PLACE OF BEGINNING. CONTAINING IN ALL 1.3145 ACRES IN ALL.

BEING KNOWN AS: RD. 2, BOX 454 (OKLAHOMA SALEM ROAD)  
A/K/A 1052 LINES ROAD, DUBOIS (BRADY TWP.), PA 15801

PROPERTY ID NO.: 107-C04-000-28

TITLE TO SAID PREMISES IS VESTED IN BRADLEY WILSON AND BERNADETTE WILSON, HUSBAND AND WIFE BY DEED FROM BERNADETTE WILSON, FORMERLY BERNADETTE CARCELLA, AND BRADLEY WILSON, HER HUSBAND DATED 05/05/86 RECORDED 05/09/86 IN DEED BOOK 1081 PAGE 09.

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania

Plaintiff

v.

Bradley Wilson  
Bernadette Wilson  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

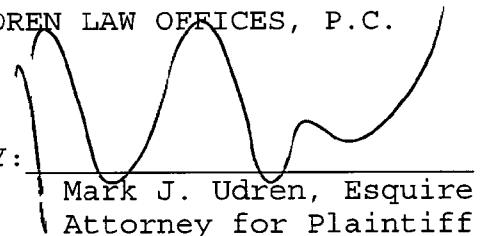
NO. 2004-1792-CD

**PRAECIPE TO SUBSTITUTE VERIFICATION**

TO THE PROTHONOTARY:

Kindly substitute the attached Verification for the  
Verification attached to the Complaint in Mortgage Foreclosure with  
regard to the captioned matter.

DATED: December 21, 2004

UDREN LAW OFFICES, P.C.  
BY:   
Mark J. Udren, Esquire  
Attorney for Plaintiff

FILED NO  
M/J:2981 CC  
DEC 23 2004

William A. Shaw  
Prothonotary/Clerk of Courts

V E R I F I C A T I O N

The undersigned, an officer of the Corporation which is the Plaintiff in the foregoing Complaint or an officer of the Corporation which is the servicing agent of Plaintiff, and being authorized to make this verification on behalf of the Plaintiff, hereby verifies that the facts set forth in the foregoing Complaint are taken from records maintained by persons supervised by the undersigned who maintain the business records of the mortgage held by Plaintiff in the ordinary course of business and that those facts are true and correct to the best of the knowledge, information and belief of the undersigned.

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

Date:November 16, 2004

  
\_\_\_\_\_  
Name: Laura Cauper  
Title: Authorized Signer  
Company: National City Mortgage Co.'

Bradley Wilson  
Bernadette Wilson  
Loan #0293871  
MJU #04100625

(A)

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

NATIONAL CITY MORTGAGE CO., :  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

vs.

BRADLEY WILSON and  
BERNADETTE WILSON  
1052 Lines Road  
DuBois, PA 15801  
Defendants

CIVIL ACTION - AT LAW

No. 2004-1792-CD

Type of Pleading:

Motion to Strike  
Judgment

Filed on Behalf of:

Defendants

Counsel of Record for This  
Party:

S. Casey Bowers, Esq.  
Supreme Court No. 89032  
Hanak, Guido and Taladay  
498 Jeffers Street  
P. O. Box 487  
DuBois, PA 15801

814-371-7768

FILED (R)

JAN 13 2005  
01/12:40p  
William A. Shaw  
Prothonotary/Clerk of Courts

1 copy to Party

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

NATIONAL CITY MORTGAGE CO., :  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

vs. : No. 2004-1792-CD

BRADLEY WILSON and  
BERNADETTE WILSON  
1052 Lines Road  
DuBois, PA 15801  
Defendants

**MOTION TO STRIKE JUDGMENT**

AND NOW, come Defendants, Bradley Wilson and Bernadette Wilson, by and through their attorneys hereby moves this Court to strike the default judgment entered against them averring as follows:

1. On or about March 21, 2001, Defendants executed the Mortgage Note referred to in paragraph 3 of Plaintiff's Complaint.
2. Several months ago, Defendants fell behind on the subject Mortgage Note.
3. Defendants made several telephone calls to Plaintiff in an effort to work a plan to get the subject mortgage current.
4. On or about October 4, 2004, Defendants tendered payment of \$1,400.00. Said amount represented monthly payments of \$661.55 due on July 1, 2004 and August 1, 2004, respectfully. True

and correct copies of the payment stubs are attached hereto and marked as Exhibit "A".

5. On or about November 4, 2004, Defendants tendered payment in the amount of \$662.00. Said amount represented monthly payment due on September 1, 2004. A true and correct copy of the receipt evidencing said payment is attached and marked as Exhibit "B".

6. Despite Defendants' repeated efforts to make payment and settle this matter without litigation, Plaintiff filed a Complaint in Mortgage Foreclosure on or about November 10, 2004.

7. Defendants then again contacted Plaintiff in an effort to work out a plan to get the subject Mortgage Note current. On several such occasions, Plaintiff's representatives assured Defendants that they would soon receive a "work out packet".

8. At no time, did Defendants ever receive such a work out packet. Instead they received a ten day default notice in accordance with PA R.C. P. 237.

9. Default judgment was entered against Defendants on or about December 23, 2004.

10. Defendants retained the undersigned on or about January 2, 2005. On that day, the undersigned contacted Plaintiff's counsel by telephone.

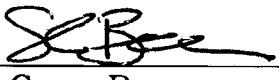
11. The undersigned was then directed to contact William Murray at Plaintiff's counsel's office. Mr. Murray assured the undersigned that a "work out packet" would soon be forthcoming.

12. To date, neither Defendants nor the undersigned counsel has received such a "work out packet".

WHEREFORE, Defendants respectfully request this  
Honorable Court to strike the default judgment entered against them.

Respectfully submitted,

HANAK, GUIDO and TALADAY

By   
S. Casey Bowers  
Attorney for Defendants

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

NATIONAL CITY MORTGAGE CO., :  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

vs. : No. 2004-1792-CD

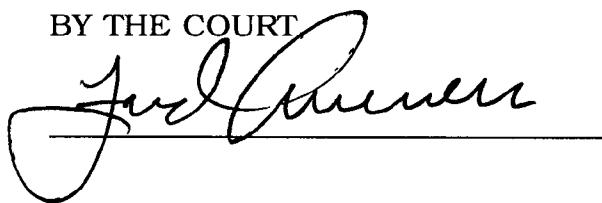
BRADLEY WILSON and  
BERNADETTE WILSON  
1052 Lines Road  
DuBois, PA 15801  
Defendants

**RULE TO SHOW CAUSE ORDER**

AND NOW, upon consideration of Defendants' Motion to  
Strike Judgment,

IT IS HEREBY ORDERED that Plaintiff file written  
response within 20 days of this Order of Court. Oral argument on  
said Motion and response is scheduled for the 10 day of  
February, 2005 at 1:30 P. m.

BY THE COURT



1-17-05

**F I L E D**  
010:0189 *McCoy, Bailes*

JAN 17 2005

William A. Shaw  
Prothonotary

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

NATIONAL CITY MORTGAGE CO., :  
s/b/m/t National City Bank of  
Pennsylvania :  
3232 Newmark Drive :  
Miamisburg, OH 45342 :  
Plaintiff :  
:

vs. :

No. 2004-1792-CD

BRADLEY WILSON and :  
BERNADETTE WILSON :  
1052 Lines Road :  
DuBois, PA 15801 :  
Defendants :  
:

**O R D E R**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2005,  
upon consideration of Defendants' Motion to Strike, Plaintiff's  
response thereto and arguments thereon,

IT IS HEREBY ORDERED AND DECREED that Defendants'  
Motion is hereby granted. The Prothonotary is directed to strike the  
judgment that was entered against Defendants on or about December  
23, 2004. Defendants shall have twenty (20) days from the date of this  
Order in which to file a responsive pleading to Plaintiff's Complaint.

BY THE COURT,

---

**DUE DATE**  
**AUG 01, 04**

**BRADLEY WILSON  
BERNADETTE WILSON**

*\*Additional funds shall be applied toward outstanding fees, and the current month's payment must be satisfied prior to additional principal payments being applied.*

**IMPORTANT**  
Payments  
not received  
by the due  
date are  
considered  
late.

4012-8  
10-404  
DATE

1000

CHECK NO. 100.  
AMOUNT

THE BOSTONIAN

**National City. Mortgage**

PO BOX 17677  
BALTIMORE MD 21297-1677

**LOAN NUMBER**  
**029387-1**

029387-1

**DUE DATE**  
**OCT 01, 04**

OCT 01, 04

**AMOUNT DUE**

IF NOT REC'D BY  
OCT 16, 04

IF NOT REC'D BY

**LATE PAYMENT**

REGULAR PAYMENT	
ADDITIONAL PRINCIPAL*	
LATE FEES	
TOTAL PAYMENT	

029387100000063771500000661554

<b>DUE DATE</b>
<b>JUL 01, 04</b>

**BRADLEY WILSON**  
**BERNADETTE WILSON**

\* Additional funds shall be applied toward outstanding fees,  
and the current month's payment must be satisfied prior to  
additional principal payments being applied.

**IMPORTANT**  
Payments  
not received  
by the due  
date are  
considered  
late.

10-12-04  
10-4-04

DATE

CHECK NO.  
100.00

AMOUNT

<b>LOAN NUMBER</b>
<b>029387-1</b>

<b>DUUE DATE</b>
<b>OCT 01, 04</b>

<b>AMOUNT DUE</b>
<b>\$637.71</b>

<b>IF NOT REC'D BY</b>
<b>OCT 16, 04</b>

<b>LATE PAYMENT</b>
<b>\$661.55</b>

REGULAR PAYMENT	
ADDITIONAL PRINCIPAL*	
LATE FEES	
TOTAL PAYMENT	

029387100000063771500000661554

1000000031006377102938710001

# National City®

200 North Brady Street  
DuBois, PA 15801

Branch ID: 00331

CSR/CB ID: 01

Time: 4:34 P.M.

---

Calendar Date: 11/05/04      Business Date: 11/08/04

---

**Mortgage Loan Payment**

**Transaction Number: 14\***

**Account Number: 0293871**

**Amount: \$662.00**

**Cash In: \$670.00**

**Cash back Amount: \$8.00**

All transactions are subject to proof and  
verification by Bank.

Thank-you for Banking With Us!

FDIC

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

NATIONAL CITY MORTGAGE CO.,	:	
s/b/m/t National City Bank of	:	
Pennsylvania	:	
3232 Newmark Drive	:	
Miamisburg, OH 45342	:	
Plaintiff	:	
vs.	:	No. 2004-1792-CD
BRADLEY WILSON and	:	
BERNADETTE WILSON	:	
1052 Lines Road	:	
DuBois, PA 15801	:	
Defendants	:	

**CERTIFICATE OF SERVICE**

I certify that on the 13th day of January, 2005, a true and correct copy of DEFENDANTS' MOTION TO STRIKE JUDGMENT was sent via first class mail, postage prepaid, to the following:

Mark J. Udren, Esq.  
Woodcrest Corporate Center  
Suite 200  
111 Woodcrst Road  
Cherry Hill, NJ 08003-3620



---

S. Casey Bowers  
Attorney for Defendants

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

NATIONAL CITY MORTGAGE CO., : CIVIL ACTION - AT LAW  
s/b/m/t National City Bank of :  
Pennsylvania : No. 2004-1792-CD  
3232 Newmark Drive :  
Miamisburg, OH 45342 : Type of Pleading:  
Plaintiff :  
vs. :  
: **CERTIFICATE OF SERVICE**  
BRADLEY WILSON and : Filed on Behalf of:  
BERNADETTE WILSON : Defendants  
1052 Lines Road : Counsel of Record for This  
DuBois, PA 15801 : Party:  
Defendants : S. Casey Bowers, Esq.  
: Supreme Court No. 89032  
: Hanak, Guido and Taladay  
: 498 Jeffers Street  
: P. O. Box 487  
: DuBois, PA 15801  
: 814-371-7768

64  
NO  
CC  
m 10:33 AM  
JAN 26 2005

Commonwealth  
Prothonotary Clerk of Courts

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

NATIONAL CITY MORTGAGE CO., :  
s/b/m/t National City Bank of :  
Pennsylvania :  
3232 Newmark Drive :  
Miamisburg, OH 45342 :  
Plaintiff :  
vs. : No. 2004-1792-CD  
BRADLEY WILSON and :  
BERNADETTE WILSON :  
1052 Lines Road :  
DuBois, PA 15801 :  
Defendants :

**CERTIFICATE OF SERVICE**

I do hereby certify that on the 25th day of January, 2005, I served by first class mail, postage prepaid, a certified copy of the Motion to Strike Judgment with attached Order of Court, upon the following:

Mark J. Udren, Esq.  
Woodcrest Corporate Center  
Suite 200  
111 Woodcrest Road  
Cherry Hill, NJ 08003-3620

  
\_\_\_\_\_  
S. Casey Bowers  
Attorney for Defendants

CR

**IN THE COURT OF COMMON PLEAS OF Clearfield COUNTY  
CIVIL DIVISION**

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania

Plaintiff

v.

Bradley Wilson  
Bernadette Wilson

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

No. 2004-1792-CD

Type of pleading:  
Plaintiff's Reply to  
Defendants' Motion to Strike  
Judgment

Filed on behalf of:  
Plaintiff

Counsel of Record for this  
party:

Mark J. Udren, Esq.  
Supreme Court Id. 04302  
Udren Law Offices, P.C.  
111 Woodcrest Road  
Cherry Hill, NJ 08003

FILED NO CC  
m 12:30 PM  
FEB 07 2005  
S/ William A. S. .  
Prothonotary/Clerk of Courts

UDREN LAW OFFICES, P.C.  
BY: Mark Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003  
856-669-5400  
[pleadings@udren.com](mailto:pleadings@udren.com)

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
Plaintiff  
  
v.  
  
Bradley Wilson  
Bernadette Wilson  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
  
No. 2004-1792-CD

PLAINTIFF'S REPLY TO DEFENDANTS' MOTION TO STRIKE JUDGMENT

1. Admitted.
2. Denied. Defendants have been in default of the mortgage since July 1, 2004.
3. Denied. After reasonable investigation, Plaintiff is without sufficient information or knowledge to formulate a response to this averment, as it is vague and confusing. By way of further Reply, no agreement has been entered into between Plaintiff and the Defendants, and the mortgage has not been brought current.
4. Denied. This averment refers to a written document, which speaks for itself. By way of further Reply, no agreement has been entered into between Plaintiff and the Defendants, and the mortgage has not been brought current.
5. Denied. This averment refers to a written document, which speaks for itself. By way of further Reply, no agreement has been entered into between Plaintiff and the Defendants, and the mortgage has not been brought

current.

6. Denied. This averment is denied as a conclusion of law to which no response is required. By way of further Reply, no agreement has been entered into between Plaintiff and the Defendants, and the mortgage has not been brought current.
7. Denied. By way of further Reply, no agreement has been entered into between Plaintiff and the Defendants, and the mortgage has not been brought current.
8. Denied. This averment is denied as a conclusion of law to which no response is required. By way of further Reply, Plaintiff has complied with all relevant laws and procedures.
9. Admitted.
10. Denied. After reasonable investigation, Plaintiff is without sufficient information or knowledge to form a belief as to the truth of this averment. By way of further Reply, January 2, 2005 was a Sunday, and the office of Plaintiff's counsel was closed.
11. Denied. After reasonable investigation, Plaintiff is without sufficient knowledge or information to form a belief as to the truth of this averment, as it's records do not indicate same, and no agreement has been entered into between Plaintiff and the Defendants, and the mortgage has not been brought current.
12. Denied. After reasonable investigation, Plaintiff is without sufficient knowledge or information to form a belief as to the truth of this averment, and no agreement has been entered into between Plaintiff and the Defendants, and the mortgage has not been brought current.

WHEREFORE Plaintiff prays and respectfully requests that the Honorable Court deny and dismiss Defendants' Motion to Strike Judgment, with prejudice, as Defendants have not provided grounds for the requested relief.

UDREN LAW OFFICES, P.C.

By: 

Mark Udren, Esquire  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF Clearfield COUNTY  
CIVIL DIVISION

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania

Plaintiff

v.

Bradley Wilson  
Bernadette Wilson

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2004-1792-CD

ORDER

AND NOW, to wit, this                   day of                   20   ,  
upon consideration of Defendants' Motion to Strike Judgment, and  
Plaintiff's response thereto, it is hereby ORDERED AND DECREED  
that the Motion is denied and dismissed, with prejudice, and that  
Plaintiff's judgment entered on December 23, 2004 is hereby  
confirmed.

BY THE COURT:

---

J.

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

**ATTORNEY FOR PLAINTIFF**

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

**Plaintiff**

V.

Bradley Wilson  
Bernadette Wilson

NO.2004-1792-CD

Defendant(s)

CERTIFICATE OF SERVICE

I, Mark J. Udren, Esquire, hereby certify that I have served true and correct copies of the Plaintiff's Reply to Defendants' Motion to Strike Judgment upon the following person(s) named herein at their last known address or their attorney of record.

xxxxxx Regular First Class Mail

Certified Mail

Other (certificate of mailing)

Date Served: February 4, 2005

TO: S. Casey Bowers, Esq.  
498 Jeffers Street  
DuBois, PA 15801

UDREN LAW OFFICES, P.C.

By:

Mark J. Udren  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

NATIONAL CITY MORTGAGE : CA

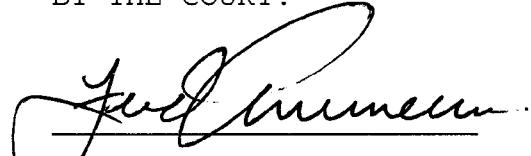
VS. : NO. 04-1792-CD

BRADLEY WILSON, et al : 104

ORDER

NOW, this day of February, 2005, this being the time and date set for hearing on Defendants' Motion to Strike Judgment, it is hereby ORDERED that said motion is denied. It is further Ordered that Plaintiff shall take no further action to enforce the subject judgment for a period of sixty (60) days after the date of this Order. During this 60-day time period, the parties shall negotiate in good faith to amicably resolve this matter.

BY THE COURT:



Fred J. Mumm  
President Judge

FILED

66 FEB 10 2005

William A. Shaw  
Prothonotary/Clerk of Courts

Cent to Atty Uppel

*2*  
Bowers

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

NO. 2004-1792-CD

**PRAECIPE TO REISSUE WRIT OF EXECUTION**

**TO THE SHERIFF:**

Reissue Writ of Execution in the above matter:

Amount due \$73,196.69

Interest From 12/22/04 \$ \_\_\_\_\_  
to Date of Sale \_\_\_\_\_  
Per diem @\$13.74

(Costs to be added) \$ \_\_\_\_\_ 132.00 Prothonotary costs

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

FILED May pd.  
m 11:32 AM 7.00  
MAY 26 2005 1CC&6wnts  
William A. Shaw w/ prop deser.  
Prothonotary/Clerk of Courts to Shff  
(68)

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

v.

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2004-1792-CD

C E R T I F I C A T E

Mark J. Udren, 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 insured mortgage
- Non-owner occupied
- Vacant
- Act 91 procedures have been fulfilled.
- Over 24 months delinquent.

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

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801

NO 2004-1792-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

National City Mortgage Co., s/b/m/t National City Bank of Pennsylvania, Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praeclipe for the Writ of Execution was filed the following information concerning the real property located at: RD. 2, Box 454 (Oklahoma Salem Road) a/k/a 1052 Lines Road, DuBois (Brady Twp.), PA 15801

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

Bradley Wilson 1052 Lines Road  
DuBois, PA 15801

Bernadette Wilson 1052 Lines Road  
DuBois, PA 15801

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

SAME AS #1 ABOVE

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

Name \_\_\_\_\_ Address \_\_\_\_\_

None

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

Name \_\_\_\_\_ Address \_\_\_\_\_

Plaintiff herein. See Caption above.

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

Name \_\_\_\_\_ Address \_\_\_\_\_

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 \_\_\_\_\_ Address \_\_\_\_\_

Real Estate Tax Dept. 1 North Second Street, Suite 116  
Clearfield, PA 16830

Domestic Relations Section 1 North Second Street, Suite 116  
Clearfield, PA 16830

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 \_\_\_\_\_ Address \_\_\_\_\_

Tenants/Occupants RD. 2, Box 454 (Oklahoma Salem Road)  
a/k/a 1052 Lines Road  
DuBois (Brady Twp.), PA 15801

S. Casey Bowers, Esq 498 Jeffers Street, PO Box 487  
DuBois, PA 15801

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.

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQ.  
Attorney for Plaintiff

DATED: May 9, 2005

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2004-1792-CD

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

To satisfy the judgment, interest and costs in the above matter, you are directed to levy upon and sell the following described property:

RD. 2, Box 454 (Oklahoma Salem Road)  
a/k/a 1052 Lines Road  
DuBois (Brady Twp.), PA 15801  
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$73,196.69

Interest From 12/22/04 \$ \_\_\_\_\_  
to Date of Sale \_\_\_\_\_  
Per diem @\$13.74

(Costs to be added) \$ \_\_\_\_\_ 132.00 Prothonotary costs

By Willie Wilson  
Clerk

Date 5/26/05

5/26/05 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.  
Willie Wilson  
Deputy Prothonotary

COURT OF COMMON PLEAS  
NO. 2004-1792-CD

=====  
National City Mortgage Co., s/b/m/t National City Bank of  
Pennsylvania

vs.

Bradley Wilson  
Bernadette Wilson

=====  
WRIT OF EXECUTION  
=====

REAL DEBT \$ 73,196.69

INTEREST \$ \_\_\_\_\_  
from 12/22/04 to \_\_\_\_\_  
Date of Sale \_\_\_\_\_  
Per diem @\$13.74

COSTS PAID:  
PROTHY \$ 132.00

SHERIFF \$ \_\_\_\_\_

STATUTORY \$ \_\_\_\_\_

COSTS DUE PROTHY. \$ \_\_\_\_\_

PREMISES TO BE SOLD:  
RD. 2, Box 454 (Oklahoma Salem Road)  
a/k/a 1052 Lines Road  
DuBois (Brady Twp.), PA 15801

Mark J. Udren, ESQUIRE  
UDREN LAW OFFICES, P.C.  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
(856) 669-5400

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATE IN BRADY TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO WIT:

BEGINNING AT A CORNER IN THE CENTER OF TOWNSHIP ROAD ROUTE NO. T-370, SAID CORNER BEING THE NORTHWEST CORNER OF THE LAND OF EDWARD SWANSON, (THE SAME LAND BEING ORIGINALLY A PART OF THE TRACT OF WHICH THIS LOT IS A PART), AND ALSO BEING THE SOUTHWEST CORNER OF THE TRACT OR LOT HEREIN DESCRIBED; THENCE BY THE CENTERLINE OF SAID TOWNSHIP ROAD, NORTH 6° 47' WEST FOR A DISTANCE OF 208.1 FEET; AND STILL BY SAID CENTERLINE OF SAID TOWNSHIP ROAD, NORTH 16° 32' WEST FOR A DISTANCE OF 135 FEET TO A CORNER AT THE INTERSECTION OF THE CENTERLINES OF THE SAID TOWNSHIP ROAD AND ANOTHER DIRT ROAD, NOW PURPORTED TO BE A TOWNSHIP ROAD; THENCE BY THE CENTERLINE OF SAID DIRT ROAD OR TOWNSHIP ROAD, SOUTH 79° 23' EAST FOR A DISTANCE OF 225.7 FEET TO A CORNER IN THE CENTERLINE OF SAID ROAD; THENCE LEAVING THE SAID DIRT ROAD OR TOWNSHIP ROAD AND THROUGH THE LANDS OF JACK LINES, ET UX. FOR A NEW LINE, SOUTH 3° 41' EAST, PASSING THROUGH AN IRON PIN AT 19.8 FEET AND CONTINUING ON FOR A TOTAL DISTANCE OF 272.0 FEET TO AN IRON PIN, THE SAME IRON PIN CORNER BEING THE NORTHEAST CORNER OF LAND OF EDWARD SWANSON AFOREMENTIONED; THENCE BY THE SAID EDWARD SWANSON, SOUTH 83° 49' WEST FOR A DISTANCE OF 176 FEET TO AN IRON PIN AND PLACE OF BEGINNING. CONTAINING IN ALL 1.3145 ACRES IN ALL.

BEING KNOWN AS: RD. 2, BOX 454 (OKLAHOMA SALEM ROAD) A/K/A 1052 LINES ROAD, DUBOIS (BRADY TWP.), PA 15801

PROPERTY ID NO.: 107-C04-000-28

TITLE TO SAID PREMISES IS VESTED IN BRADLEY WILSON AND BERNADETTE WILSON, HUSBAND AND WIFE BY DEED FROM BERNADETTE WILSON, FORMERLY BERNADETTE CARCELLA, AND BRADLEY WILSON, HER HUSBAND DATED 05/05/86 RECORDED 05/09/86 IN DEED BOOK 1081 PAGE 09.

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

v.

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO  
M 1205 610  
SEP 29 2005

Prothonotary

NO. 2004-1792-CD

**AFFIDAVIT OF SERVICE PURSUANT TO Pa.R.C.P.RULE 3129.1**

Plaintiff, by its/his/her Attorney, Mark J. Udren, Esquire, hereby verifies that:

1. A copy of the Notice of Sheriff's Sale, a true and correct copy of which is attached hereto as Exhibit "A", was sent to every recorded lienholder and every other interested party known as of the date of the filing of the Praecept for the Writ of Execution, on the date(s) appearing on the attached Certificates of Mailing.
2. A Notice of Sheriff's Sale was sent to Defendant(s) by regular mail and certified mail on the date appearing on the attached Return Receipt, which was signed for by Defendant(s) on the date specified on the said Return Receipt. Copies of the said Notice and Return Receipt are attached hereto as Exhibit "B".
3. If a Return Receipt is not attached hereto, then service was by personal service on the date specified on the attached Return of Service, attached hereto as Exhibit "B".
4. If service was by Order of Court, then proof of compliance with said Order is attached hereto as Exhibit "B".

All Notices were served within the time limits set forth by Pa Rule C.P. 3129.

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

Dated: September 16, 2005

BY:

Mark J. Udren, Esquire  
Attorney for Plaintiff

UDREN LAW OFFICES, P.C.

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
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National City Mortgage Co.,  
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Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2004-1792-CD

v.  
Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

DATE: August 5, 2005

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

NOTICE OF SHERIFF'S SALE  
OF REAL PROPERTY

OWNER(S): Bradley Wilson & Bernadette Wilson

PROPERTY: RD. 2, Box 454 (Oklahoma Salem Road)  
a/k/a 1052 Lines Road DuBois (Brady Twp.), PA 15801

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on October 7, 2005, at 10:00 AM, in the CLEARFIELD COUNTY COURTHOUSE, 1 NORTH SECOND STREET, SUITE 116, CLEARFIELD, PA. Our records indicate that you may hold a mortgage or judgment on the property which will be extinguished by the sale. You may wish to attend the sale to protect your interests.

A Schedule of Distribution will be filed by the Sheriff on a date specified by the Sheriff not later than 30 days after sale. Distribution will be made in accordance with the schedule unless exceptions are filed thereto within 10 days after the filing of the schedule.

EXHIBIT A

Name and Address Of Sender		UDREN LAW OFFICES, P.C.		Check appropriate block for Registered Mail:		Affix stamp here if issued as certificate of mailing or for additional copies of this bill.		
		WOODCREST CORPORATE CENTER 111 WOODCREST ROAD CHERRY HILL, NJ 08003		<input type="checkbox"/> Registered Insured	<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> With Postal Insurance	<input type="checkbox"/> Without postal Insurance	
Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge	Act. Value (if Regis.)	Insured Value	Postmark and Date of Receipt
1	WILSON	REAL ESTATE TAX DEPT. 1 NORTH SECOND STREET, SUITE 116, CLEARFIELD, PA 16830						
2	04100625	DOMESTIC RELATIONS SECTION 1 NORTH SECOND STREET, SUITE 116, CLEARFIELD, PA 16830						
3	CLEARFIE LD COUNTY	COMMONWEALTH OF PA DEPT OF REVENUE, BUREAU OF COMPLIANCE, DEPT. 280946, HARRISBURG, PA 17128-0946						
4		TENANTS/OCCUPANTS RD 2, BOX 454 (OKLAHOMA SALEM ROAD) AKA 1052 LINES ROAD, DUBOIS, (BRADY TWP.) PA 15801						
5		S. CASEY BOWERS, ESQ. 498 JEFFERS STREET, P.O. BOX 487, DUBOIS, PA 15801						
6	JODIE							
7								
8								
9								
10								
11								
12								
13								
14								
15								
Total number of Pieces Listed by Sender	Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)	<p>The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail sent with optional postal insurance. See Domestic Mail Manual R90, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to third and forth class parcels.</p>					
5	5	JFR						

**EXHIBIT A**

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
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Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2004-1792-CD

v.  
Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

SUGGESTION OF BANKRUPTCY

To the Prothonotary:

Kindly note on the record that the above Defendant, **BRADLEY B. WILSON** has filed **Chapter 13 (CONVERTED FROM A CHAPTER 7)** Bankruptcy in the **WESTERN** District of Pennsylvania (JOHNSTOWN) on OCTOBER 4, 2005, Bankruptcy Case No. 05-72401.

\_\_\_\_\_  
Mark J. Udren, Esquire  
UDREN LAW OFFICES, P.C.  
Attorney for Plaintiff

FILED NOCC  
M112548D  
DEC 28 2005 LM  
V. MAT. A. S. 304  
Prothonotary Clerk of Court

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20176  
NO: 04-1792-CD

PLAINTIFF: NATIONAL CITY MORTGAGE CO., A/B/M/T NATIONAL CITY BANK OF PENNSYLVANIA  
vs.  
DEFENDANT: BRADLEY WILSON AND BERNADETTE WILSON

Execution REAL ESTATE

**SHERIFF RETURN**

DATE RECEIVED WRIT: 05/26/2005

LEVY TAKEN 08/10/2005 @ 12:40 PM

POSTED 08/10/2005 @ 12:40 PM

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 05/01/2006

DATE DEED FILED **NOT SOLD**

**FILED**  
08/10/58  
MAY 01 2006

William A. Shaw  
Prothonotary/Clerk of Courts

**DETAILS**

08/17/2005 @ 12:50 PM SERVED BRADLEY WILSON

SERVED BRADLEY WILSON, DEFENDANT, AT HIS RESIDENCE 1052 LINES ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO BERNADETTE WILSON, WIFE/DEFENDANT

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

08/17/2005 @ 12:50 PM SERVED BERNADETTE WILSON

SERVED BERNADETTE WILSON, DEFENDANT, AT HER RESIDENCE 1052 LINES ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO BERNADETTE WILSON

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

@ SERVED

NOW, OCTOBER 4, 2005 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO CONTINUE THE SHERIFF SALE SCHEDULED FOR OCTOBER 7, 2005 TO JANUARY 6, 2006. DUE TO BANKRUPTCY FILING.

@ SERVED

NOW, DECEMBER 22, 2006 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO STAY THE SHERIFF SALE SCHEDULED FOR JANUARY 6, 2006 DUE TO BANKRUPTCY FILING.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20176  
NO: 04-1792-CD

PLAINTIFF: NATIONAL CITY MORTGAGE CO., A/B/M/T NATIONAL CITY BANK OF PENNSYLVANIA  
vs.

DEFENDANT: BRADLEY WILSON AND BERNADETTE WILSON

Execution REAL ESTATE

SHERIFF RETURN

---

SHERIFF HAWKINS \$235.98

SURCHARGE \$40.00 PAID BY ATTORNEY

So Answers,

  
By: *Cynthia Bitter-Augmented*  
Chester A. Hawkins  
Sheriff

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

ATTORNEY FOR PLAINTIFF

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania  
3232 Newmark Drive  
Miamisburg, OH 45342  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2004-1792-CD

Bradley Wilson  
Bernadette Wilson  
1052 Lines Road  
DuBois, PA 15801  
Defendant(s)

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

To satisfy the judgment, interest and costs in the above matter, you are directed to levy upon and sell the following described property:

RD. 2, Box 454 (Oklahoma Salem Road)  
a/k/a 1052 Lines Road  
DuBois (Brady Twp.), PA 15801  
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$73,196.69

Interest From 12/22/04 \$ \_\_\_\_\_  
to Date of Sale \_\_\_\_\_  
Per diem @\$13.74

(Costs to be added) \$ \_\_\_\_\_ 132.00 Prothonotary costs

By Willie L. Hagan  
Clerk

Date 5/26/05

Received May 26, 2005 @ 3:30 P.M.  
Chester A. Hawken  
By Amitha Butler-Aylenbach

5-26-05 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Willie L. Hagan  
Deputy Prothonotary

COURT OF COMMON PLEAS  
NO. 2004-1792-CD

National City Mortgage Co., s/b/m/t National City Bank of  
Pennsylvania

vs.

Bradley Wilson  
Bernadette Wilson

=====  
WRIT OF EXECUTION  
=====

REAL DEBT \$ 73,196.69

INTEREST \$ \_\_\_\_\_  
from 12/22/04 to \_\_\_\_\_  
Date of Sale \_\_\_\_\_  
Per diem @\$13.74

COSTS PAID:  
PROTHY \$ 132.00

SHERIFF \$ \_\_\_\_\_

STATUTORY \$ \_\_\_\_\_

COSTS DUE PROTHY. \$ \_\_\_\_\_

PREMISES TO BE SOLD:  
RD. 2, Box 454 (Oklahoma Salem Road)  
a/k/a 1052 Lines Road  
DuBois (Brady Twp.), PA 15801

Mark J. Udren, ESQUIRE  
UDREN LAW OFFICES, P.C.  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
(856) 669-5400

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATE IN BRADY TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO WIT:

BEGINNING AT A CORNER IN THE CENTER OF TOWNSHIP ROAD ROUTE NO. T-370, SAID CORNER BEING THE NORTHWEST CORNER OF THE LAND OF EDWARD SWANSON, (THE SAME LAND BEING ORIGINALLY A PART OF THE TRACT OF WHICH THIS LOT IS A PART), AND ALSO BEING THE SOUTHWEST CORNER OF THE TRACT OR LOT HEREIN DESCRIBED; THENCE BY THE CENTERLINE OF SAID TOWNSHIP ROAD, NORTH 6° 47' WEST FOR A DISTANCE OF 208.1 FEET; AND STILL BY SAID CENTERLINE OF SAID TOWNSHIP ROAD, NORTH 16° 32' WEST FOR A DISTANCE OF 135 FEET TO A CORNER AT THE INTERSECTION OF THE CENTERLINES OF THE SAID TOWNSHIP ROAD AND ANOTHER DIRT ROAD, NOW PURPORTED TO BE A TOWNSHIP ROAD; THENCE BY THE CENTERLINE OF SAID DIRT ROAD OR TOWNSHIP ROAD, SOUTH 79° 23' EAST FOR A DISTANCE OF 225.7 FEET TO A CORNER IN THE CENTERLINE OF SAID ROAD; THENCE LEAVING THE SAID DIRT ROAD OR TOWNSHIP ROAD AND THROUGH THE LANDS OF JACK LINES, ET UX. FOR A NEW LINE, SOUTH 3° 41' EAST, PASSING THROUGH AN IRON PIN AT 19.8 FEET AND CONTINUING ON FOR A TOTAL DISTANCE OF 272.0 FEET TO AN IRON PIN, THE SAME IRON PIN CORNER BEING THE NORTHEAST CORNER OF LAND OF EDWARD SWANSON AFOREMENTIONED; THENCE BY THE SAID EDWARD SWANSON, SOUTH 83° 49' WEST FOR A DISTANCE OF 176 FEET TO AN IRON PIN AND PLACE OF BEGINNING. CONTAINING IN ALL 1.3145 ACRES IN ALL.

BEING KNOWN AS: RD. 2, BOX 454 (OKLAHOMA SALEM ROAD) A/K/A 1052 LINES ROAD, DUBOIS (BRADY TWP.), PA 15801

PROPERTY ID NO.: 107-C04-000-28

TITLE TO SAID PREMISES IS VESTED IN BRADLEY WILSON AND BERNADETTE WILSON, HUSBAND AND WIFE BY DEED FROM BERNADETTE WILSON, FORMERLY BERNADETTE CARCELLA, AND BRADLEY WILSON, HER HUSBAND DATED 05/05/86 RECORDED 05/09/86 IN DEED BOOK 1081 PAGE 09.

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME BRADLEY WILSON NO. 04-1792-CD

NOW, April 29, 2006, 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 January 06, 2006, I exposed the within described real estate of Bradley Wilson And Bernadette Wilson to public venue or outcry at which time and place I sold the same to he/she being the highest bidder, for the sum of and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR SERVICE	15.00
MILEAGE	15.00
LEVY	15.39
MILEAGE POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	4.81
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	
ADD'L POSTING	
ADD'L MILEAGE	15.39
ADD'L LEVY	
BID/SETTLEMENT AMOUNT	
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	20.00
MISCELLANEOUS	
<b>TOTAL SHERIFF COSTS</b>	<b>\$235.98</b>

**DEED COSTS:**

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

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	73,196.69
INTEREST @ 13.7400	5,221.20
FROM 12/22/2004 TO 01/06/2006	
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>\$78,457.89</b>
<b>COSTS:</b>	
ADVERTISING	428.86
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	
DEED COSTS	0.00
SHERIFF COSTS	235.98
LEGAL JOURNAL COSTS	216.00
PROTHONOTARY	132.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
<b>TOTAL COSTS</b>	<b>\$1,152.84</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

**UDREN LAW OFFICES, P.C.**  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD  
SUITE 200  
CHERRY HILL, NEW JERSEY 08003-3620  
856 . 669 . 5400  
FAX: 856 . 669 . 5399

**PENNSYLVANIA OFFICE**  
215-568-9500  
215-568-1141 FAX

MARK J. UDREN\*  
STUART WINNEG\*\*  
GAYL SPIVAK ORLOFF\*\*\*  
HEIDI R. SPIVAK\*\*\*  
MARISA JOY MYERS\*\*\*  
LORRAINE DOYLE\*\*  
ALAN M. MINATO\*\*\*  
\*ADMITTED NJ, PA, FL  
\*\*ADMITTED PA  
\*\*\*ADMITTED NJ, PA  
TINA MARIE RICH  
OFFICE ADMINISTRATOR

**FREDDIE MAC  
PENNSYLVANIA  
DESIGNATED COUNSEL**

PLEASE RESPOND TO NEW JERSEY OFFICE

October 4, 2005

Sent via telefax #1-814-765-5915  
and Regular Mail

Clearfield County Sheriff's Office  
Clearfield County Courthouse  
1 North Second Street  
Suite 116  
Clearfield, PA 16830  
ATTN: Cindy

Re: National City Mortgage Co., s/b/m/t National City Bank of  
Pennsylvania  
vs.  
Bradley Wilson & Bernadette Wilson  
Clearfield County C.C.P. No. 2004-1792-CD  
Premises: RD. 2, Box 454 (Oklahoma Salem Road)  
a/k/a 1052 Lines Road, DuBois (Brady Twp.), PA 15801  
SS Date: October 7, 2005

Dear Cindy:

Please Postpone the Sheriff's Sale scheduled for October 7, 2005 to  
January 6, 2006.

Sale is postponed for the following reason:

Defendant(s) filed Chapter 7 Bankruptcy on October 4, 2005 in the  
Western District (Johnstown, PA). Case number #05-72401.

Thank you for your attention to this matter.

Sincerely yours,

Mark J. Udren  
UDREN LAW OFFICES, P.C.

/hac

UDREN LAW OFFICES, P.C.  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD  
SUITE 200  
CHERRY HILL, NEW JERSEY 08003-3620  
856 . 669 . 5400  
FAX: 856 . 669 . 5399

PENNSYLVANIA OFFICE  
215-568-9500  
215-568-1141 FAX

MARK J. UDREN\*  
STUART WINNEG\*\*  
GAVL SPIVAK ORLOFF\*\*\*  
HEIDI R. SPIVAK\*\*\*  
MARISA JOY MYERS\*\*\*  
LORRAINE DOYLE\*\*  
ALAN M. MINATO\*\*\*  
\*ADMITTED NJ, PA, PL  
\*\*ADMITTED PA  
\*\*\*ADMITTED NJ, PA  
TINA MARIE RICH  
OFFICE ADMINISTRATOR

**FREDDIE MAC  
PENNSYLVANIA  
DESIGNATED COUNSEL**

PLEASE RESPOND TO NEW JERSEY OFFICE

October 4, 2005

Sent via telefax #1-814-765-5915  
and Regular Mail

Clearfield County Sheriff's Office  
Clearfield County Courthouse  
1 North Second Street  
Suite 116  
Clearfield, PA 16830  
ATTN: Cindy

Re: National City Mortgage Co., s/b/m/t National City Bank of  
Pennsylvania  
vs.  
Bradley Wilson & Bernadette Wilson  
Clearfield County C.C.P. No. 2004-1792-CD  
Premises: RD. 2, Box 454 (Oklahoma Salem Road)  
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Western District (Johnstown, PA). Case number #05-72401.

Thank you for your attention to this matter.

Sincerely yours,

Mark J. Udren  
UDREN LAW OFFICES, P.C.

/hac

UDREN LAW OFFICES, P.C.  
MARK J. UDREN, ESQUIRE - ID #04302  
STUART WINNEG, ESQUIRE - ID #45362  
LORRAINE DOYLE, ESQUIRE - ID #34576  
ALAN M. MINATO, ESQUIRE - ID #75860  
CHANDRA M. ARKEMA, ESQUIRE - ID #203437  
LOUIS A. SIMONI, ESQUIRE - ID #200869  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400 pleadings@udren.com

ATTORNEY FOR PLAINTIFF

RE  
JUL 21 2009  
M/16/15/c  
William A. Shaw  
Prothonotary/Clerk of Courts  
1 CLNT 70

National City Mortgage Co.,  
s/b/m/t National City Bank of  
Pennsylvania

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

Atty

Plaintiff

NO. 2004-1792-CD

v.

Bradley Wilson  
Bernadette Wilson

Defendant

PRAECIPE TO WITHDRAW JUDGMENT AND DISCONTINUE WITHOUT PREJUDICE

TO THE PROTHONOTARY:

Kindly mark the above captioned matter JUDGMENT  
WITHDRAWN and ACTION DISCONTINUED WITHOUT PREJUDICE.

DATED: July 13, 2009

UDREN LAW OFFICES, P.C.

BY: SGS

Attorneys for Plaintiff  
MARK J. UDREN, ESQUIRE  
STUART WINNEG, ESQUIRE  
LORRAINE DOYLE, ESQUIRE  
ALAN M. MINATO, ESQUIRE  
CHANDRA M. ARKEMA, ESQUIRE  
- LOUIS A. SIMONI, ESQUIRE