

04-1794-CD
DEUTSCHE BANK NATIONAL TRUST CO. vs. CHRISTINE D. DELONG

In The Court of Common Pleas of Clearfield County, Pennsylvania

DEUTSCHE BANK NATIONAL TRUST COMPANY

VS.

DELONG, CHRISTINE D.

Sheriff Docket #

16605

04-1794-CD

COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

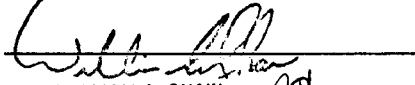
NOW DECEMBER 8, 2004 AT 11:30 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON CHRISTINE D. DELONG, DEFENDANT AT RESIDENCE, 303 E. MALONEY ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CHRISTINE D. DELONG A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: DEHAVEN/COUDRIET

Return Costs

Cost	Description
75.00	SHERIFF HAWKINS PAID BY: ATTY CK# 9254
10.00	SURCHARGE PAID BY: ATTY CK# 9255

Sworn to Before Me This

23rd Day Of Dec. 2004


WILLIAM A. SHAW

Prothonotary

My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,


Chester A. Hawkins

Sheriff

FILED

DEC 23 2004

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20175
NO: 04-1794-CD

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF AMERIQUEST MORTGAGE SECURITIES, INC, ASSET BACKED PASS THROUGH CERTIFICATES, SERIES 2004-R1 UNDER THE POOLING & SERVICING AGREEMENT DATED AS OF FEBRUARY 1, 2004 WITHOUT RECOURSE

vs.

DEFENDANT: CHRISTINE D. DELONG

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 05/26/2005

LEVY TAKEN 08/01/2005 @ 12:00 PM

POSTED 08/01/2005 @ 12:00 PM

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 05/01/2006

DATE DEED FILED **NOT SOLD**

FILED
01/05/06
MAY 01 2006

William A. Shaw
Prothonotary/Clerk of Courts

DETAILS

08/12/2005 @ 10:20 AM SERVED CHRISTINE D. DELONG

SERVED CHRISTINE D. DELONG, DEFENDANT, AT HER RESIDENCE 303 E. MALONEY ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CHRISTINE D. DELONG

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20175

NO: 04-1794-CD

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF AMERIQUEST MORTGAGE
SECURITIES, INC, ASSET BACKED PASS THROUGH CERTIFICATES, SERIES 2004-R1 UNDER THE POOLING &
SERVICING AGREEMENT DATED AS OF FEBRUARY 1, 2004 WITHOUT RECOURSE

vs.

DEFENDANT: CHRISTINE D. DELONG


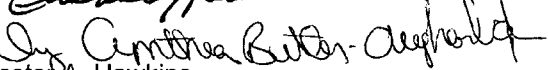
Execution REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS \$252.13

SURCHARGE \$20.00 PAID BY ATTORNEY

So Answers,



Chester A. Hawkins
Sheriff

Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC
One Jenkintown Square, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANT.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 2004-01794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

**WRIT OF EXECUTION
(Mortgage Foreclosure)**

Commonwealth of Pennsylvania
County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

To satisfy the Judgment, interest and costs in the above matter you are directed to levy upon and
sell the following described property (specifically described property below):

ALL real property and improvements located at 303 E. Maloney Road, Township of Sandy, DuBois, PA
15801.

BEING Parcel No. 128-B04-130, and as more fully described in attached description.

Amount	\$ 91,815.78
Interest accrued	
from 01/14/05 to Date of Sale	\$
Other costs	\$
Total	\$

Prothonotary costs 125.00

PROTHONOTARY

BY:

Deputy Prothonotary

Seal of Court

Date: 5/26/05

Received May 26, 2005 @ 3:30 P.M.

Charles A. Hawkins by Arthur Buter-Augherbach

No.2004-01794-CD

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

Deutsche Bank National Trust Company, as
Trustee of Ameriquet Mortgage Securities, Inc.
Asset Backed Pass Through Certificates,
Series 2004-R1 Under the Pooling
and Servicing Agreement dated as of
February 1, 2004, Without Recourse
Plaintiff

v.

Christine D. Delong
Defendant.

WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed: _____

Richard M. Squire, Esquire
Richard M. Squire & Associates, LLC
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, Pa 19046

(215) 886-8790 Fax (215) 886-8791

Attorneys for Plaintiff


Attorney for Plaintiff(s)

Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC
One Jenkintown Square, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANT.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 2004-01794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

PROPERTY DESCRIPTION

ALL THAT CERTAIN piece, or tract of land lying and being in the Township of Sandy, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at an existing one inch iron pipe, said pipe being the southwestern corner of lands now or formerly of Donald J. & Thelma Salada (Deed Book 1230-359), and also being the southeastern corner of the herein described parcel:

THENCE North 89 degrees 51 minutes West along the northern line of lands now or formerly of James A. Carns, Jr., a distance of 697.. feet to an existing angle iron;

THENCE, North 80 degrees 31 minutes West along the line of lands now or formerly of Donald J. & Thelma Salada, a distance of 168.66 feet to an existing angle iron;

THENCE, North 89 Degrees 24 minutes West along the line of lands now or formerly of Donald J. & Thelma Salada, and the eastern line of lands of the Clearfield County Industrial Development Authority, a distance of 218.69 feet to an existing one inch iron pipe; said iron pipe being the northeastern corner of the herein described parcel,

THENCE, South 79 degrees 38 minutes along the southern line of lands of Dennis L. & Janice Salada, a distance of 294.34 feet to a power pole, said pole being on the northern line of lands of the herein described parcel;

THENCE, North 89 degrees 45 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 149.96 feet to a one inch iron pipe;

THENCE, South 00 degrees 31 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 34.17 feet to a one inch iron pipe;

THENCE, North 89 degrees 45 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 694.23 feet to a one inch iron pipe, said iron pipe being on the western line of lands now or formerly of R. Kirby & Cathy M. Nupp, (Deed Book 1230-351) and being the northeast corner of the herein described parcel;

THENCE, South 01 degrees 05 minutes East along the western line of lands now or formerly of R. Kirby & Cathy Nupp, a distance of 299.01 feet to an existing iron pipe; said iron pipe being the southwest corner of lands now or formerly of R. Kirby & Cathy M. Nupp; said pipe also being the southeast corner of the herein described parcel, and point of beginning.

BEING known as 303 E. Maloney Road.

BEING tax parcel # 128-B04-130.

BEING the same premises which Donald J. Salada & Thelma Salada, husband and wife, by Deed dated September 18, 2000 and recorded September 21, 2000 inst. #200014015 in the Clearfield County Office of the Recorder of Deeds.

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME CHRISTINE D. DELONG

NO. 04-1794-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 Christine D. Delong 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	15.00
SERVICE	15.00
MILEAGE	15.39
LEVY	15.00
MILEAGE	15.39
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	5.18
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	
DEED	
ADD'L POSTING	
ADD'L MILEAGE	46.17
ADD'L LEVY	
BID/SETTLEMENT AMOUNT	
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	20.00
MISCELLANEOUS	
TOTAL SHERIFF COSTS	\$252.13

DEED COSTS:

ACKNOWLEDGEMENT	
REGISTER & RECORDER	
TRANSFER TAX 2%	0.00
TOTAL DEED COSTS	\$0.00

PLAINTIFF COSTS, DEBT AND INTEREST:

DEBT-AMOUNT DUE	91,815.78
INTEREST @	0.00
FROM 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	20.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	
TOTAL DEBT AND INTEREST	\$91,835.78

COSTS:

ADVERTISING	0.00
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	
DEED COSTS	0.00
SHERIFF COSTS	252.13
LEGAL JOURNAL COSTS	252.00
PROTHONOTARY	125.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
TOTAL COSTS	\$2,092.07

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

RICHARD M. SQUIRE & ASSOCIATES, LLC
ATTORNEYS AT LAW
Offices In Pennsylvania And New Jersey

Richard M. Squire*
Joseph Diorio

* Also Admitted In MD

Pamela S. Keys
Firm Administrator

One Jenkintown Station
115 West Avenue, Suite 104
Jenkintown, PA 19046
Tel (215) 886-8790 Fax (215) 886-8791
Email: bcorkery@squirelaw.com

October 7, 2005


Sheriff of Clearfield County
Attn: Cindy @ Real Estate
Fax #: (814) 765-6089

Re: **Deutsche Bank National Trust Company**
vs. Christine D. DeLong
Court No. 04-1794
Sale Date: October 7, 2005

Please POSTPONE the above referenced Sale from OCTOBER 7, 2005 to
JANUARY 6, 2006 due to Chapter 13 Bankruptcy filing on 10/5/05, docket #05-72452.

Thank you for your assistance with this matter.

Very truly yours,


Brian Corkery
Foreclosure Department

cc:

RICHARD M. SQUIRE & ASSOCIATES, LLC
ATTORNEYS AT LAW
Offices In Pennsylvania And New Jersey

Richard M. Squire*

* Also Admitted In MD

Pamela S. Fouch
Firm Administrator

One Jenkintown Station
115 West Avenue, Suite 104
Jenkintown, PA 19046
Tel (215) 886-8790 Fax (215) 886-8791
Email: bcorkery@squirelaw.com

January 4, 2006

Clearfield County Sheriff's Office
Attn: Cindy
Fax #: (814) 765-6089
From: Brian Corkery
No. of Pages (including this one): 1

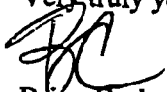
Re: **Deutsche Bank National Trust Company**
vs. Christine D. Delong
Court No. 04-1794
Sale: JANUARY 6, 2006

Sir/Madam:

Kindly STAY the above referenced Sale Scheduled for JANUARY 6, 2006 due to active Chapter 7 Bankruptcy filed on 10/10/05, docket #05-13824.

Thank you for your assistance with this matter.

Very truly yours,



Brian Corkery
Foreclosure Department

Richard M. Squire & Associates, LLC

Attorneys for Plaintiff

By: Richard M. Squire, Esquire

M. Troy Freedman, Esquire

I.D. Nos. 04267 / 85165

One Jenkintown Station, Suite 104

115 West Avenue

Jenkintown, PA 19046

Telephone: 215- 886-8790

Fax: 215-886-8791

3/11/10 NO CC
P. 111-1052
C. 10

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities,
Inc., Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse,

PLAINTIFF,

v.

Christine D Delong
303 E. Maloney Road
DuBois, PA 15801,

DEFENDANT.

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET NO: 04-1794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

PRAECIPE FOR SUBSTITUTION OF PARTIES UNDER Pa. R.C.P. 2352(a)

TO THE PROTHONOTARY:

Kindly substitute Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2004-R1, as Plaintiff, in the above-captioned matter regarding the real property located at 303 E. Malone Road, DuBois, PA 15801 for all purposes in connection with the above-captioned captioned matter. The basis for this substitution is that Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2004-R1 is the current holder of the underlying Mortgage by an Assignment of Mortgage from Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2004-R1 under the Pooling & Servicing Agreement dated as of February 1, 2004 Without Recourse,

to Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2004-R1; such Assignment having been duly recorded in the Office of the Recorder of Deeds in and for Clearfield County on 02/25/2011 as Instrument # 201102449 and incorporated herein by reference.

WHEREFORE, it is respectfully requested that Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset-Backed Pass-Through Certificates, Series 2004-R1 be substituted for Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2004-R1 under the Pooling & Servicing Agreement dated as of February 1, 2004 Without Recourse, as Plaintiff for all purposes in connection with this matter.

Richard M. Squire & Associates, LLC

By: _____

Richard M. Squire, Esq. (PA I.D.# 04267)
M. Troy Freedman, Esq. (PA I.D.# 85165)
Christina C. Viola, Esq. (PA I.D.# 308909)
115 West Avenue, Suite 104
Jenkintown, PA 19046
215-886-8790
215-886-8791 (fax)
rsquire@squirelaw.com
tfreedman@squirelaw.com
cviola@squirelaw.com
Attorneys for Plaintiff

Date: March 18, 2011

Richard M. Squire & Associates, LLC
By: Richard M. Squire, Esquire
M. Troy Freedman, Esquire
I.D. Nos. 04267 / 85165
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791

Attorneys for Plaintiff

Deutsche Bank National Trust Company,
as Trustee of Ameriquest Mortgage
Securities, Inc., Asset Backed Pass
Through Certificates, Series 2004-R1
under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse,

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801,

DEFENDANT.

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET NO: 04-1794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

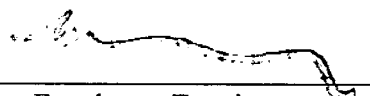
CERTIFICATE OF SERVICE

I, M. Troy Freedman, Esquire, hereby certify that, on this date, I served or caused to be served a true and correct copy of the foregoing Plaintiff's Praecipe for Substitution of Parties upon the following persons via regular mail, postage prepaid:

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

RICHARD M. SQUIRE & ASSOCIATES, LLC

Dated: March 18, 2011

BY: 
M. Troy Freedman, Esquire
Attorney for Plaintiff

Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC.
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, Pa 19046
Telephone: 215-886-8790
Fax: 215-886-8791
Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series
2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004 Without
Recourse,

PLAINTIFF,

v.

Christine D. DeLong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANTS.

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

NO:

04-1794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

**COMPLAINT - CIVIL ACTION
NOTICE TO DEFEND**

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim of relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800)692-7375

FILED
M 1:35 PM 11/10/04
100 to Shiff
NOV 10 2004

11/10/04

Proth

AVISO

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

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO VAYA EN PERSONA O LLAME POR TELFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTANCIA LEGAL.

**Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800)692-7375**

Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC.
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, Pa 19046
Telephone: 215-886-8790
Fax: 215-886-8791
Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series
2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004 Without
Recourse,

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANTS.

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

NO:

CIVIL ACTION

MORTGAGE FORECLOSURE

COMPLAINT IN MORTGAGE FORECLOSURE

Plaintiff, Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2004-R1 under the Pooling & Servicing Agreement dated as of February 1, 2004 Without Recourse, by and through its attorney, Richard M. Squire, brings this action in mortgage foreclosure upon the following cause of action:

1. Plaintiff, Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2004-R1 under the Pooling & Servicing Agreement dated as of February 1, 2004 Without Recourse ("Plaintiff"), is a corporation with a principal place of business at 505 City Parkway West, Suite 100 Orange CA 92865.
2. Defendant(s), Christine D. Delong, is/are the real owner(s) and mortgagor(s) and grantee(s) in the last deed of record to the hereinafter described real estate located at 303 E. Malone

Road DuBois, PA 15801, hereinafter "Premises." Defendant(s) resides at 303 E. Maloney Road DuBois, PA15801.

3. On 12/17/2003 Defendant, Christine D. Delong, made, executed and delivered a mortgage for the benefit of Ameriquet Mortgage Company as security for the payment by defendant(s) of certain sums due and owing by Defendant(s) under a promissory note executed by Defendant(s) on the same date in consideration for a loan made to Defendant(s) by Plaintiff. Said mortgage is recorded in the Office of the Recorder in and for Clearfield County, at Instrument No. 200323323, and is incorporated herein by reference by virtue of Pa. R.C.P. §1019(g).
4. Plaintiff is in the process of preparing a legal assignment.
5. Plaintiff is, therefore, either the original Mortgagee named in the Mortgage, the legal successor in interest to the original mortgagee, or is the present holder of the Mortgage by virtue of the above-described assignments.
6. The premises subject to the aforesaid mortgage is described in Exhibit "A," which is attached hereto and incorporated herein by reference. The address of the mortgaged premises is 303 E. Malone Road, DuBois, PA 15801.
7. The aforesaid mortgage is in default because the required monthly payments due under the terms of the aforesaid note and mortgage have not been made from 05/01/2004 through the present date. By the terms of the said mortgage, upon breach and failure to cure said breach after notice, all sums secured by said mortgage shall be immediately due and owing.
8. The terms of the said mortgage further provide that in the event of default, Defendant shall be liable for Plaintiff's costs and attorney's fees.

9. The following amounts are due as of November 9, 2004:

Principal of Mortgage debt due and unpaid	\$82,362.18
Accrued interest through November 9, 2004	3,953.79
Late Charges	244.71
Corporate Advance	20.00
Attorney's Fees	4,118.11
TOTAL	<u>\$ 90,698.79</u>

plus costs, interest at the rate of 17.73 *per diem* for each day after 04/01/2004 until the entry of judgment, and interest from the date of judgment as provided by law.

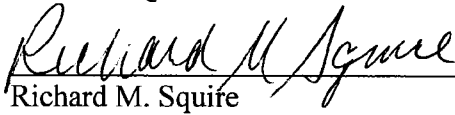
10. Plaintiff has demanded the total amount due from Defendant, but Defendant has failed to pay the same.

11. Notice of intention to Foreclose pursuant to 41 P.S. § 403 and Notice pursuant to the Homeowner's Emergency Mortgage Assistance Act of 1983, 35 P.S. § 1680.402c, et seq. was mailed to each individual Defendant via regular and certified mail, return receipt requested, on 07/08/2004. A true and correct copy of said notice is attached hereto and marked as Exhibit "B" and is incorporated herein by reference as though fully set forth at length.

WHEREFORE, Plaintiff demands judgment *in rem* be entered in its favor and against Defendant(s) Christine D. Delong, for foreclosure and sale of the Mortgaged Premises in the amounts due as set forth in paragraph 09, namely \$90,698.79 plus costs, interest *per diem* and interest from the date of judgment as provided by law, and for such other and further relief as the

Court shall deem just and proper.

RICHARD M. SQUIRE & ASSOCIATES, LLC

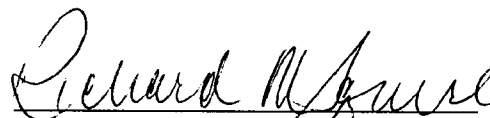
By: 
Richard M. Squire
115 West Avenue, Suite 104
Jenkintown, PA 19046
215-886-8790
Attorneys for Plaintiff

Date:

UNLESS YOU NOTIFY US IN WRITING WITHIN THIRTY (30) DAYS AFTER RECEIPT OF THIS LETTER THAT THE DEBT, OR ANY PART OF IT, IS DISPUTED, WE WILL ASSUME THAT THE DEBT IS VALID. IF YOU DO NOTIFY US OF A DISPUTE, WE WILL OBTAIN VERIFICATION OF THE DEBT AND MAIL IT TO YOU. ALSO UPON YOUR WRITTEN REQUEST WITHIN THIRTY (30) DAYS, WE WILL PROVIDE YOU WITH THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR IF DIFFERENT FROM THE CURRENT CREDITOR. THIS COMMUNICATION IS AN ATTEMPT TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

VERIFICATION

Richard M. Squire, hereby states that he is the attorney for the Plaintiff, a corporation, unless designated otherwise; that he is authorized to make 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. §4904 relating to unsworn falsification to authorities.

A handwritten signature in cursive script, appearing to read "Richard M. Squire", is written over a horizontal line.

Richard M. Squire, Esquire
Attorney for Plaintiff

Date:

EXHIBIT "A"

LEGAL DESCRIPTION

ALL THAT CERTAIN PIECE, parcel, or tract of land lying and being in the Township of Sandy, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at an existing one inch iron pipe, said pipe being the southwestern corner of lands now or formerly of Donald J. & Thelma Salada (Deed Book 1230-359), and also being the southeastern corner of the herein described parcel;

THENCE, North 89 degrees 51 minutes West along the northern line of lands now or formerly of James A. Carns, Jr., a distance of 697.00 feet to an existing angle iron;

THENCE, North 00 degrees 31 minutes West along the line of lands now or formerly of Donald J. & Thelma Salada, a distance of 168.56 feet to an existing angle iron;

THENCE, South 89 degrees 24 minutes West along the line of lands now or formerly of Donald J. & Thelma Salada, a distance of 439.22 feet to an existing angle iron;

THENCE, North 00 degrees 30 minutes West along the western line of lands of Donald J. & Thelma Salada, and the eastern line of lands of the Clearfield County Industrial Development Authority, a distance of 216.69 feet to an existing one inch iron pipe; said iron pipe being the northeastern corner of the herein described parcel

THENCE, South 79 degrees 38 minutes along the southern line of lands of Dennis L. & Janice Salada, a distance of 294.34 feet to a power pole, said pole being on the northern line of lands of the herein described parcel;

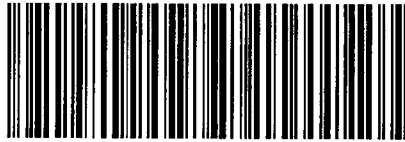
THENCE, North 89 degrees 45 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 149.96 feet to a one inch iron pipe;

THENCE, South 00 degrees 31 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 34.17 feet to a one inch iron pipe;

THENCE, North 89 degrees 45 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 694.23 feet to a one inch iron pipe; said iron pipe being on the western line of lands now or formerly of R. Kirby & Cathy M. Nupp, (Deed Book 1230-351); and being the northeast corner of the herein described parcel;

THENCE, South 01 degrees 05 minutes East along the western line of lands now or formerly of R. Kirby & Cathy Nupp, a distance of 299.01 feet to an existing iron pipe; said iron pipe being the southwest corner of lands now or formerly of R. Kirby & Cathy M. Nupp; said pipe also being the southeast corner of the herein described parcel, and the point of the beginning.

P.O. Box 11000
Santa Ana, CA 92711-1000



7182 6389 3060 0414 2639



July 08, 2004

CHRISTINE D DELONG
303 E MALONEY ROAD
DU BOIS, PA 15801

245 / NMC

ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

STATEMENTS OF POLICY

Loan Number: 0065596108
Property Address: 303 E MALONEY ROAD, DU BOIS PA, 15801
Original Lender: Ameriquest Mortgage Company
Current Lender/Servicer: Ameriquest Mortgage Company

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

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

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact 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 INMEDITAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO

Exhibit "B"

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 agency 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 a 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.

July 08, 2004

Loan Number: 0065596108

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

(If you have filed bankruptcy you can still apply for Emergency Mortgage Assistance.)

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

NATURE OF THE DEFAULT -The MORTGAGE debt by the above lender on your property located at: at 303 E MALONEY ROAD, DU BOIS, PA 15801 IS SERIOUSLY IN DEFAULT because:

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

05/01/04 thru 07/01/04 at \$679.75 per month

Monthly Payments plus late charge or other fees: \$1620.83

Total Amount to Cure Default: \$1620.83

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable): N/A

HOW TO CURE THE DEFAULT --You may cure the default within THIRTY (30) DAYS of the date of this notice **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS \$1620.83 PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:**

Ameriquist Mortgage Company
505 City Parkway West, Suite #100
Orange, CA 92868-2912

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.) N/A**

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

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

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

RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE -- If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, **you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the total amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by**

performing any other requirements under the mortgage. Curing your default in the manner set forth in this notice will restore your mortgage to the same position as if you had never defaulted.

EARLIEST POSSIBLE SHERIFF'S SALE DATE -- It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be approximately (6) MONTHS from the date of this Notice. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

HOW TO CONTACT THE LENDER:

Ameriquist Mortgage Company
PO Box 11000
Orange, CA 92711-1000
Phone Number 800-430-5262
Fax Number 714-347-5037

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

ASSUMPTION OF MORTGAGE -- You may or X may not (CHECK ONE) 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.

YOU MAY ALSO HAVE THE RIGHT:

- ✕ TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- ✕ TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- ✕ TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- ✕ TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS,
- ✕ TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- ✕ TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY ARE ATTACHED

Very Truly Yours,

Ameriquist Mortgage Company

Cc: Ameriquist Mortgage Company
Attn: Collections Department

Loan Number: 0065596108

Mailed by 1st Class Mail and by Certified Mail

Homeowners' Emergency Assistance Program 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 East Plank Road
Altoona, PA 16602
(814) 944-8100
FAX (814) 944-5747

CCCS of Northeastern PA
1631 South Atherton Street
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

Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC
One Jenkintown Square, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANT.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 2004-01794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

FILED 3cc
m/11/3/05 Lewits
MAY 26 2005 w/ clker. to
Shff

William A. Shaw
Prothonotary/Clerk of Courts
Any pd. 20.00

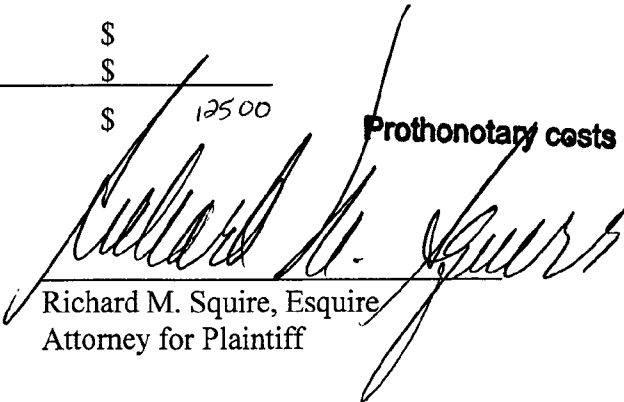
To the Prothonotary:

Issue Writ of Execution in the above matter.

Amount Due	\$ 91,815.78
Interest accrued from 01/14/05 to	
Date of Sale	\$
Other costs	\$
Total	\$ 125.00

Prothonotary costs

Date: 5/25/05


Richard M. Squire, Esquire
Attorney for Plaintiff

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

Deutsch Bank National Trust Company, as Trustee of
Ameritrust Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

Plaintiffs

vs.

CHRISTINE D. DELONG
303 E. Maloney Road
DuBois, PA 15801

Defendant

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

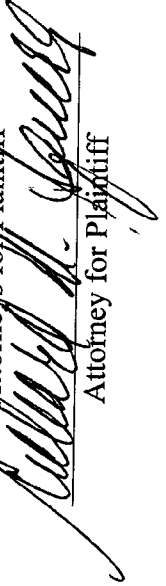
Filed: _____

Richard M. Squire, Esquire
Richard M. Squire & Associates, LLC
One Jenkintown Station, Suite 104

115 West Avenue
Jenkintown, PA 19046

(215) 886-8790 Fax (215) 886-8791

Attorneys for Plaintiff


Attorney for Plaintiff

Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC
One Jenkintown Square, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANT.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 2004-01794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

AFFIDAVIT PURSUANT TO RULE 3129.1

Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc. Asset Backed Pass Through Certificates, Series 2004-R1 under the Pooling & Servicing Agreement dated as of February 1, 2004 Without Recourse, Plaintiff in the above action, sets forth as of the date the Praecipe for the Writ of Execution was filed to following information concerning the real property at 303 E. Maloney Road, Township of Sandy, DuBois, PA 15801.

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

Christine D. Delong

303 E. Maloney Road
DuBois, PA 15801

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

Christine D. Delong

303 E. Maloney Road
DuBois, PA 15801

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

NONE OTHER

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

NONE OTHER

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

NONE OTHER

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:

Domestic Relations Section
Court of Common Pleas

Courthouse
One North 2nd Street
Clearfield, PA 16830

Commonwealth of PA
Department of Revenue
Bureau of Compliance

Dept. 280946
Harrisburg, PA 17128-0946

Department of Public Welfare
ATTN: Legal Department

Health & Welfare Building
PO Box 2675
Harrisburg, PA 17105

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:

Tenant/Occupant

303 E. Maloney Road
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. §4904 relating to unsworn falsification to authorities.

Date: 5/25/15

By: 

Richard M. Squire & Associates, LLC

Richard M. Squire, Esquire
115 West Avenue, Suite 104
Jenkintown, PA 19046
Attorneys for Plaintiff

Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC
One Jenkintown Square, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANT.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 2004-01794-CD

CIVIL ACTION

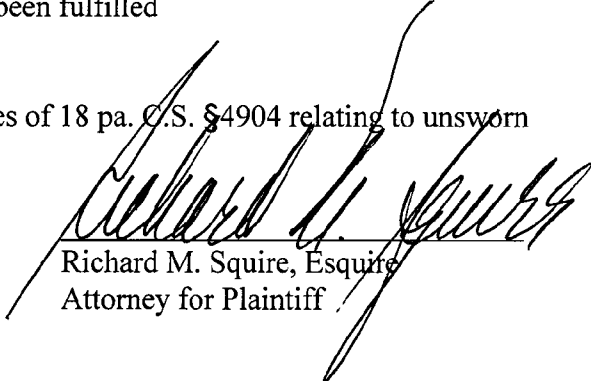
MORTGAGE FORECLOSURE

CERTIFICATION

Richard M. Squire, Esquire, hereby certify that he is attorney for the Plaintiff in the above captioned matter, and that the premises are not subject to the provisions of Act 91 because it is:

- ☐ An FHA Mortgage
☐ Non-owner occupied
☐ Vacant
☒ Act 91 Procedures have been fulfilled

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


Richard M. Squire, Esquire
Attorney for Plaintiff

Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC
One Jenkintown Square, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANT.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 2004-01794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

TO: Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

Your real property at 303 E. Maloney Road, Township of Sandy, DuBois, PA 15801, is scheduled to be sold at Sheriff's sale on at 10:00 A.M. in Sheriff's Office at the Clearfield County Courthouse, 230 East Market Street, Clearfield, PA 16830, to enforce the court Judgment of \$91,815.78 obtained by Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Back Pass Through Certificates, Series 2004-R1 under the Pooling & Servicing Agreement dated as of February 1, 2004 Without Recourse, against you on January 14, 2005.

NOTICE OF OWNER'S RIGHTS

NOTE: This law firm is a debt collector and is attempting to collect a debt on behalf of plaintiff in this matter. This notice is an attempt to collect a debt and any information obtained hereby will be used for such purpose.

YOU MAY BE ABLE TO PREVENT THIS SHERIFF'S SALE

To prevent this Sheriff's sale you must take immediate action:

1. The sale will be cancelled if you pay to Plaintiff, the amount of the Judgment plus costs, back payments, late charges, costs and reasonable attorney's fees due. To find out how much you must pay, you may call Richard M. Squire, Esquire at 215-886-8790.
2. You may be able to stop the sale by filing a petition asking the Court to strike or open the Judgment, if the judgment was improperly entered. You may also ask the Court to postpone the sale for good cause.
3. You may also be able to stop the sale through other legal proceedings.

You may need an attorney to assert your rights. The sooner you contact one, the more chance you will have of stopping the sale. (See notice on page two on how to obtain an attorney).

YOU MAY STILL BE ABLE TO SAVE YOUR PROPERTY AND YOU HAVE OTHER RIGHTS EVEN IF THE SHERIFF'S SALE DOES TAKE PLACE

1. If the Sheriff's sale is not stopped, your property will be sold to the highest bidder. You may find out the price bid by calling the Sheriff at 814-765-2641.
2. You may be able to petition the Court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.
3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened you may call the Sheriff at 814-765-2641.
4. If the amount due from the buyer is not paid to the Sheriff, you will remain the owner of the property as if the sale never happened.
5. You have a right to remain in the property until the full amount due is paid to the Sheriff and the Sheriff gives a Deed to the Buyer. At that time, the Buyer may bring legal proceedings to evict you.
6. You may be entitled to a share of the money that was paid for your property. A schedule of distribution of the money bid for your property will be filed by the Sheriff within thirty (30) days of the sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with the schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after the schedule of distribution is filed.
7. You may also have other rights and defenses, or ways of getting your property back, if you act immediately after the sale.

YOU SHOULD TAKE THIS NOTICE TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE LISTED BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERENCE SERVICE
David S. Meholick, Court Administrator
Clearfield County Courthouse
One North 2nd Street
Clearfield, PA 16830
Tel: 814-765-2641

Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC
One Jenkintown Square, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff

COPY

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANT.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 2004-01794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

**WRIT OF EXECUTION
(Mortgage Foreclosure)**

Commonwealth of Pennsylvania
County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

To satisfy the Judgment, interest and costs in the above matter you are directed to levy upon and sell the following described property (specifically described property below):

ALL real property and improvements located at 303 E. Maloney Road, Township of Sandy, DuBois, PA 15801.

BEING Parcel No. 128-B04-130, and as more fully described in attached description.

Amount	\$ 91,815.78
Interest accrued	
from 01/14/05 to Date of Sale	\$
Other costs	\$
Total	\$

Prothonotary costs

125.00
Willie L. Hays, Jr.
PROTHONOTARY

Seal of Court

BY: _____

Deputy Prothonotary

Date: 5/26/05

No.2004-01794-CD

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.
Asset Backed Pass Through Certificates,
Series 2004-R1 Under the Pooling
and Servicing Agreement dated as of
February 1, 2004, Without Recourse
Plaintiff

v.

Christine D. Delong
Defendant.

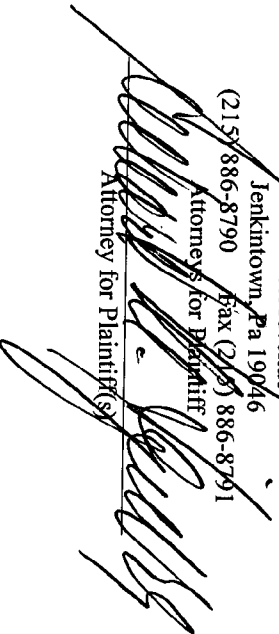
WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed: _____

Richard M. Squire, Esquire
Richard M. Squire & Associates, LLC
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, Pa 19046
(215) 886-8790 Fax (215) 886-8791

Attorneys for Plaintiff

Attorney for Plaintiff(s)



Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC
One Jenkintown Square, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANT.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 2004-01794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

PROPERTY DESCRIPTION

ALL THAT CERTAIN piece, or tract of land lying and being in the Township of Sandy, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at an existing one inch iron pipe, said pipe being the southwestern corner of lands now or formerly of Donald J. & Thelma Salada (Deed Book 1230-359), and also being the southeastern corner of the herein described parcel:

THENCE North 89 degrees 51 minutes West along the northern line of lands now or formerly of James A. Carns, Jr., a distance of 697.. feet to an existing angle iron;

THENCE, North 80 degrees 31 minutes West along the line of lands now or formerly of Donald J. & Thelma Salada, a distance of 168.66 feet to an existing angle iron;

THENCE, North 89 Degrees 24 minutes West along the line of lands now or formerly of Donald J. & Thelma Salada, and the eastern line of lands of the Clearfield County Industrial Development Authority, a distance of 218.69 feet to an existing one inch iron pipe; said iron pipe being the northeastern corner of the herein described parcel,

THENCE, South 79 degrees 38 minutes along the southern line of lands of Dennis L. & Janice Salada, a distance of 294.34 feet to a power pole, said pole being on the northern line of lands of the herein described parcel;

THENCE, North 89 degrees 45 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 149.96 feet to a one inch iron pipe;

THENCE, South 00 degrees 31 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 34.17 feet to a one inch iron pipe;

THENCE, North 89 degrees 45 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 694.23 feet to a one inch iron pipe, said iron pipe being on the western line of lands now or formerly of R. Kirby & Cathy M. Nupp, (Deed Book 1230-351) and being the northeast corner of the herein described parcel;

THENCE, South 01 degrees 05 minutes East along the western line of lands now or formerly of R. Kirby & Cathy Nupp, a distance of 299.01 feet to an existing iron pipe; said iron pipe being the southwest corner of lands now or formerly of R. Kirby & Cathy M. Nupp; said pipe also being the southeast corner of the herein described parcel, and point of beginning.

BEING known as 303 E. Maloney Road.

BEING tax parcel # 128-B04-130.

BEING the same premises which Donald J. Salada & Thelma Salada, husband and wife, by Deed dated September 18, 2000 and recorded September 21, 2000 inst. #200014015 in the Clearfield County Office of the Recorder of Deeds.

Richard M. Squire & Associates, LLC
By: Richard M. Squire, Esquire
ID No. 04267
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, Pa 19046
Telephone: 215-886-8790
Fax: 215-886-8791
Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities,
Inc., Asset Backed Pass Through Certificates,
Series 2004-R1 under the Pooling &
Servicing Agreement dated as of February 1,
2004 Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANTS.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY,
PENNSYLVANIA

NO 04-1794-CD

CIVIL ACTION

FILED
M 2:23 PM 2005
Noted to Del
sent to Del
JAN 14 2005

William A. Shaw
Prothonotary

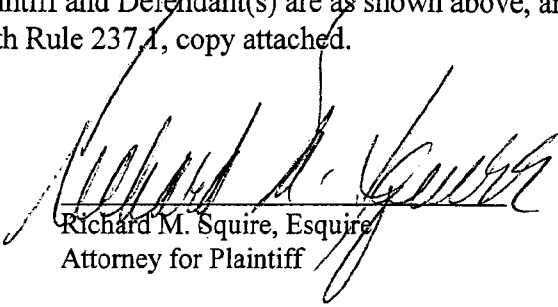
**PRAECIPE FOR JUDGMENT FOR FAILURE TO
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against Christine D. Delong, Defendants for their 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 the Complaint	\$90,698.79
Interest from November 9, 2004	
to January 11, 2004	<u>\$1,116.99</u>
TOTAL	\$91,815.78

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


Richard M. Squire, Esquire
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: _____

PROTHONOTARY

Richard M. Squire & Associates, LLC

By: Richard M. Squire, Esquire

One Jenkintown Station, Suite 104

115 West Avenue

Jenkintown, Pa 19046

Telephone: 215-886-8790

Fax: 215-886-8791

Attorneys for Plaintiff

Deutsche Bank National Trust Company, as
Trustee of Ameritrust Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series
2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004 Without
Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANTS.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

NO 04-1794-CD

CIVIL ACTION

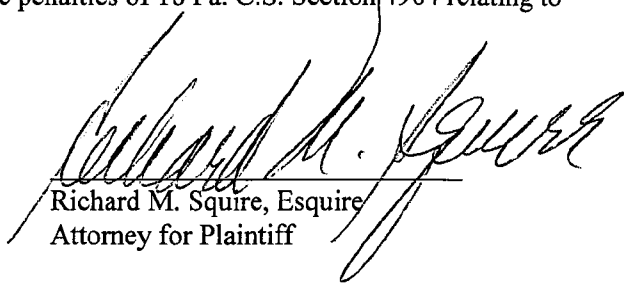
VERIFICATION OF NON-MILITARY SERVICE

Richard M. Squire, Esquire, hereby verifies that he is attorney for the Plaintiff in the above-captioned matter, and that on information and belief, he has knowledge of the following facts, to wit:

(a) that the defendants is/are not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of Congress of 1940, as amended.

(b) that Defendants Christine D. Delong are over 18 years of age and reside at 303 E. Malone Road, DuBois, PA 15801.

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


Richard M. Squire, Esquire
Attorney for Plaintiff

Office of the
PROTHONOTARY
Clearfield County
230 E. Market Street
Clearfield, PA 16830
(814)765-2641

Date _____

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series
2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004 Without
Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANTS.

NOTICE

TO: Christine D Delong
303 E. Maloney Road
DuBois, PA 15801

Pursuant to requirements of Pennsylvania Rules of Civil Procedure, Rule 236, notice is hereby given that
on _____, a judgment(decree)(order) was entered against you in this office in the
proceeding as indicated above.

Prothonotary

Deputy Prothonotary

Date Mailed: _____

Richard M. Squire, Esquire
I.D. No. 04267
Richard M. Squire & Associates, LLC.
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, Pa 19046
Telephone: 215-886-8790
Fax: 215-886-8791
Attorneys for Plaintiff

**Deutsche Bank National Trust Company,
as Trustee of Ameriquest Mortgage
Securities, Inc., Asset Backed Pass
Through Certificates, Series 2004-R1
under the Pooling & Servicing Agreement
dated as of February 1, 2004 Without
Recourse,**

PLAINTIFF,

v.

**Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801**

DEFENDANTS.

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

NO: 04-1794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

**TO: Christine D Delong
303 E. Maloney Road
DuBois PA 15801**

DATE OF NOTICE: December 28, 2004

THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT A DEBT AND ANY
INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE.

IMPORTANT NOTICE

You are in default because you have failed to enter a written appearance personally or by attorney and file in writing with the court your defenses or objections to the claims set forth against you. Unless you act within ten (10) days from the date of this notice, a Judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to a lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal help:

**Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800)692-7375**

Office of the
PROTHONOTARY
Clearfield County
230 E. Market Street
Clearfield, PA 16830
(814)765-2641

Date _____

Deutsche Bank National Trust Company, as
Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series
2004-R1 under the Pooling & Servicing
Agreement dated as of February 1, 2004 Without
Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANTS.

NOTICE

TO: Christine D Delong
303 E. Maloney Road
DuBois, PA 15801

Pursuant to requirements of Pennsylvania Rules of Civil Procedure, Rule 236, notice is hereby given that
on _____, a judgment(degree)(order) was entered against you in this office in the
proceeding as indicated above.

Prothonotary

Deputy Prothonotary

Date Mailed: _____

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

Deutsche Bank National Trust Company
Ameriquest Mortgage Company
Plaintiff(s)

No.: 2004-01794-CD

Real Debt: \$91,815.78

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Christine D Delong
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: January 14, 2005

Expires: January 14, 2010

Certified from the record this 14th day of January, 2005

William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

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

Plaintiff/Attorney

Richard M. Squire & Associates, LLC

Attorneys for Plaintiff

By: Richard M. Squire, Esquire
M. Troy Freedman, Esquire
ID. Nos. 04267 / 85165

One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, PA 19046
Telephone: 215-886-8790
Fax: 215-886-8791

Deutsche Bank National Trust Company,
as Trustee of Ameriquest Mortgage
Securities, Inc., Asset Backed Pass
Through Certificates, Series 2004-R1
under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANTS.

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 04-1794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

**PRAECIPE FOR RE-ISSUED
WRIT OF EXECUTION**
(Mortgage Foreclosure)

To the Prothonotary:

Kindly Re-Issue Writ of Execution in the above matter.

FILED
SEP 27 2010
William A. Squire
Prothonotary/Clerk of Court
Any pd.
7.00
1cc to
writs to
Sheriff
w/ desc.

**PRAECIPE FOR RE-ISSUED
WRIT OF EXECUTION
(Mortgage Foreclosure)**

Amount Due	\$	91,815.79
Interest From 01/12/2005 to 9/15/2010 [2072 days x \$17.73 per diem]	\$	<u>36,736.56</u>
Subtotal	\$	128,552.35
Credit for payments made in bankruptcy	\$	<u>(32,632.73)</u>
Total as of 9/15/2010	\$	95,919.62
Interest From 09/16/2010 to Date of Sale @ \$15.81 per diem	\$	_____
* plus fees and costs		

✱ 132.00 Prothonotary costs

Dated: September 24, 2010

By:


Richard M. Squire, Esq. (PA I.D.# 04267)
M. Troy Freedman, Esq. (PA I.D.# 85165)
Andrew P. Sonin, Esq. (PA I.D.# 204500)
115 West Avenue, Suite 104
Jenkintown, PA 19046
215-886-8790
215-886-8791 (fax)
rsquire@squirelaw.com
tfreedman@squirelaw.com
asonin@squirelaw.com
Attorneys for Plaintiff

Docket No.04-1794-CD

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

Deutsche Bank National Trust Company, as Trustee of Amerquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, SERIES 2004-R1
under the Pooling & Servicing Agreement dated as of February 1, 2004 Without Recourse,
Plaintiff

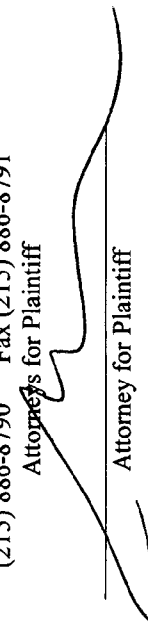
v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801,
Defendant.

PRAECIPE FOR RE-ISSUED
WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed: _____

Richard M. Squire, Esquire
M. Troy Freedman, Esquire
Richard M. Squire & Associates, LLC
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff



Attorney for Plaintiff

Richard M. Squire & Associates, LLC

Attorneys for Plaintiff

By: Richard M. Squire, Esquire

M. Troy Freedman, Esquire

ID. Nos. 04267 / 85165

One Jenkintown Station, Suite 104

115 West Avenue

Jenkintown, PA 19046

Telephone: 215-886-8790

Fax: 215-886-8791

Deutsche Bank National Trust Company,
as Trustee of Ameriquest Mortgage
Securities, Inc., Asset Backed Pass
Through Certificates, Series 2004-R1
under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANTS.

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 04-1794-CD

CIVIL ACTION

RE-ISSUED WRIT OF EXECUTION

(Mortgage Foreclosure)

COMMONWEALTH OF PENNSYLVANIA

:

COUNTY OF CLEARFIELD

:

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

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

303 E. Maloney Road, Dubois, PA 15801, Tax Parcel No. 1280-B04-000-00130

(See attached legal description)

RE-ISSUED WRIT OF EXECUTION
(Mortgage Foreclosure)

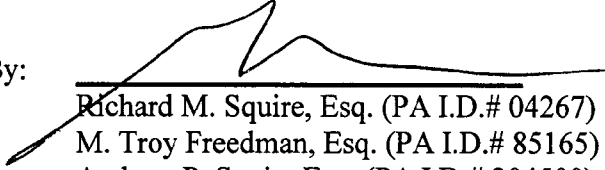
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Subtotal	\$	128,552.35
Credit for payments made in bankruptcy	\$	<u>(32,632.73)</u>
Total as of 9/15/2010	\$	95,919.62
Interest From 09/16/2010 to Date of Sale	\$	_____
* plus fees and costs		

132.00

Prothonotary costs

Dated: September 24, 2010

By:


Richard M. Squire, Esq. (PA I.D.# 04267)
M. Troy Freedman, Esq. (PA I.D.# 85165)
Andrew P. Sonin, Esq. (PA I.D.# 204500)
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Jenkintown, PA 19046
215-886-8790
215-886-8791 (fax)
rsquire@squirelaw.com
tfreedman@squirelaw.com
asonin@squirelaw.com
Attorneys for Plaintiff

 9/27/10

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series 2004-R1
under the Pooling & Servicing Agreement dated as of February 1, 2004 Without Recourse,
Plaintiff,

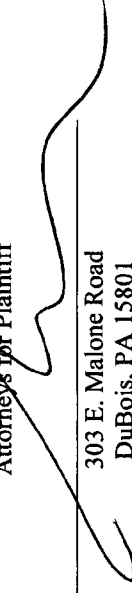
v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801,
Defendant.

RE-ISSUED WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed: _____

Richard M. Squire, Esquire
M. Troy Freedman, Esquire
Richard M. Squire & Associates, LLC
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff



303 E. Maloney Road
DuBois, PA 15801
Tax Parcel No. 1280-B04-000-00130

LEGAL DESCRIPTION

ALL THAT CERTAIN piece, or tract of land lying and being in the Township of Sandy, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at an existing one inch iron pipe, said pipe being the southwestern corner of lands now or formerly of Donald J. & Thelma Salada (Deed Book 1230-359), and also being the southeastern corner of the herein described parcel:

THENCE North 89 degrees 51 minutes West along the northern line of lands now or formerly of James A. Carns, Jr., a distance of 697.. feet to an existing angle iron;

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BEING known as 303 E. Maloney Road.

BEING tax parcel # 128-B04-130.

BEING the same premises which Donald J. Salada & Thelma Salada, husband and wife, by Deed dated September 18, 2000 and recorded September 21, 2000 inst. #200014015 in the Clearfield County Office of the Recorder of Deeds.

Richard M. Squire & Associates, LLC
By: Richard M. Squire, Esquire
M. Troy Freedman, Esquire
I.D. Nos. 04267 / 85165

One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791

Attorneys for Plaintiff

FILED
SEP 27 2010
William A. Snavely
Prothonotary/Clerk of Courts

Deutsche Bank National Trust Company,
as Trustee of Ameriquest Mortgage
Securities, Inc., Asset Backed Pass
Through Certificates, Series 2004-R1
under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANTS.

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 04-1794-CD

CIVIL ACTION

MORTGAGE FORECLOSURE

AFFIDAVIT PURSUANT TO RULE 3129.1

Deutsche Bank National Trust Company, as Trustee of Ameriquest Mortgage Securities, Inc., Asset Backed Pass Through Certificates, Series 2004-R1 under the Pooling & Servicing Agreement dated as of February 1, 2004 Without Recourse, Plaintiff in the above action, being authorized to do so, sets forth as of the date the Praecipe for the Writ of Execution was filed, the following information concerning the real property located at 303 E. Maloney Road, DuBois, PA 15801, Tax Parcel No. 1280-B04-000-00130:

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

Christine D. Delong 303 E. Maloney Road, DuBois, PA 15801

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

Christine D. Delong 303 E. Maloney Road, DuBois, PA 15801

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

Deutsche Bank National Trust Company	10801 East 6 th Street, Suite 130 Rancho Cucamonga, CA 91730
--------------------------------------	--

Deutsche Bank National Trust Company c/o American Home Mortgage Servicing Inc.	6501 Irvine Center Drive Irvine, CA 92618
--	--

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

Ameriquist Mortgage Company	1100 Town & Country Rd., Suite 200 Orange, CA 92868
-----------------------------	--

Deutsche Bank National Trust Company	10801 6 th Street, Ste 130 Rancho Cucamonga, CA 91730
--------------------------------------	---

Deutsche Bank National Trust Company c/o American Home Mortgage Servicing Inc.	6501 Irvine Center Drive Irvine, CA 92618
--	--

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

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:

PA Department of Revenue Bureau of Compliance	P.O. Box 281230 Harrisburg, PA 17128-1230
--	--

Department of Public Welfare Attn : Legal Department	Health & Welfare Building P. O. Box 2675 Harrisburg, PA 17105-2675
---	--

Clearfield County Domestic Relations	230 East Market Street, Suite 300 Clearfield, PA 16830
--------------------------------------	---

Clearfield County Assessment Office & Tax Claim Bureau	230 East Market Street, Clearfield, PA 16830
---	---

- | | |
|-------------------|---|
| Tenant/Occupant | 303 E. Maloney Road
Dubois, PA 15801 |
| William S. Delong | 303 E. Maloney Road
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. §4904 relating to unsworn falsification to authorities.

By:

Date: September 24, 2010

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 21245

NO: 04-1794-CD

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF AMERQUEST MORTGAGE SECURITIES, INC. ASSET BACKED PASS THROUGH CERTIFICATES SERIES 2004-R1 UNDER THE POOLING & SERVICING AGREEMENT DATED AS OF FEBRUARY 1, 2004 WEITHOUT RECOURSE

vs.

DEFENDANT: CHRISTINE D. DELONG

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 9/27/2010

LEVY TAKEN 10/19/2010 @ 11:12 AM

POSTED 10/19/2010 @ 11:11 AM

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 8/12/2011

DATE DEED FILED **NOT SOLD**

FILED
019.52m
2011
William A. Shaw
Prothonotary/Clerk of Courts

DETAILS

10/22/2010 @ 2:52 PM SERVED CHRISTINE D. DELONG

SERVED CHRISTINE D. DELONG, DEFENDANT, AT HER RESIDENCE 303 E. MALONEY ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO WILLIAM DELONG, HUSBAND/ADULT AT RESIDENCE

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, NOVEMBER 29, 2010 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEULED FOR DECEMBER 3, 2010 TO JANUARY 7, 2011.

@ SERVED

NOW, JANUARY 5, 2011 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED FOR JANUARY 4, 2011 TO APRIL 1, 2011, PER CLIENT REQUEST.

@ SERVED

NOW, MARCH 30, 2011 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO STAY THE SHERIFF SALE SCHEDULED FOR APRIL 1, 2011.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 21245

NO: 04-1794-CD

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF AMERIQUEST MORTGAGE
SECURITIES, INC. ASSET BACKED PASS THROUGH CERTIFICATES SERIES 2004-R1 UNDER THE POOLING &
SERVICING AGREEMENT DATED AS OF FEBRUARY 1, 2004 WEITHOUT RECOURSE

vs.

DEFENDANT: CHRISTINE D. DELONG

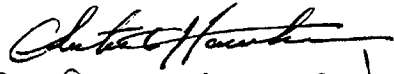
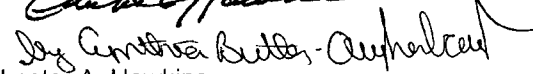
Execution REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS \$210.30

SURCHARGE \$20.00 PAID BY PLAINTIFF

So Answers,


By  Cynthia Butler, Authorized
Chester A. Hawkins
Sheriff

Richard M. Squire & Associates, LLC

Attorneys for Plaintiff

By: Richard M. Squire, Esquire
M. Troy Freedman, Esquire
ID. Nos. 04267 / 85165

One Jenkintown Station, Suite 104

115 West Avenue

Jenkintown, PA 19046

Telephone: 215-886-8790

Fax: 215-886-8791

Deutsche Bank National Trust Company,
as Trustee of Ameriquest Mortgage
Securities, Inc., Asset Backed Pass
Through Certificates, Series 2004-R1
under the Pooling & Servicing
Agreement dated as of February 1, 2004
Without Recourse

PLAINTIFF,

v.

Christine D Delong
303 E. Maloney Road
DuBois, PA 15801

DEFENDANTS.

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

NO. 04-1794-CD

CIVIL ACTION

RE-ISSUED WRIT OF EXECUTION

(Mortgage Foreclosure)

COMMONWEALTH OF PENNSYLVANIA :
COUNTY OF CLEARFIELD :

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

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

303 E. Maloney Road, Dubois, PA 15801, Tax Parcel No. 1280-B04-000-00130

(See attached legal description)

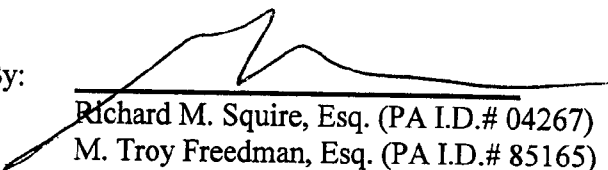
RE-ISSUED WRIT OF EXECUTION
(Mortgage Foreclosure)

Amount Due	\$	91,815.79
Interest From 01/12/2005 to 9/15/2010 [2072 days x \$17.73 per diem]	\$	<u>36,736.56</u>
Subtotal	\$	128,552.35
Credit for payments made in bankruptcy	\$	<u>(32,632.73)</u>
Total as of 9/15/2010	\$	95,919.62
Interest From 09/16/2010 to Date of Sale	\$	_____
* plus fees and costs		

132.00 Prothonotary costs

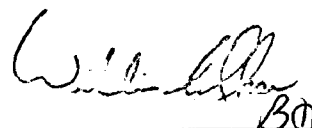
Dated: September 24, 2010

By:


Richard M. Squire, Esq. (PA I.D.# 04267)
M. Troy Freedman, Esq. (PA I.D.# 85165)
Andrew P. Sonin, Esq. (PA I.D.# 204500)
115 West Avenue, Suite 104
Jenkintown, PA 19046
215-886-8790
215-886-8791 (fax)
rsquire@squirelaw.com
tfreedman@squirelaw.com
asonin@squirelaw.com
Attorneys for Plaintiff

Received this writ this 27th day
of September A.D. 2010
At 3:00 A.M. (P.M.)

Charles A. Hawkins
Sheriff By Cynthia Butler-Chephalant


William L. Baker 9/27/10

Docket No. 04-1794-CD

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

Deutsche Bank National Trust Company, as Trustee of Amerquest Mortgage Securities, Inc.,
Asset Backed Pass Through Certificates, Series 2004-R1
under the Pooling & Servicing Agreement dated as of February 1, 2004 Without Recourse,
Plaintiff,

v.

Christine D. Delong
303 E. Maloney Road
DuBois, PA 15801,
Defendant.

RE-ISSUED WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed: _____

Richard M. Squire, Esquire
M. Troy Freedman, Esquire
Richard M. Squire & Associates, LLC
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, PA 19046
(215) 886-8790 Fax (215) 886-8791
Attorneys for Plaintiff

303 E. Maloney Road
DuBois, PA 15801
Tax Parcel No. 1280-B04-000-00130

LEGAL DESCRIPTION

ALL THAT CERTAIN piece, or tract of land lying and being in the Township of Sandy, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at an existing one inch iron pipe, said pipe being the southwestern corner of lands now or formerly of Donald J. & Thelma Salada (Deed Book 1230-359), and also being the southeastern corner of the herein described parcel:

THENCE North 89 degrees 51 minutes West along the northern line of lands now or formerly of James A. Carns, Jr., a distance of 697.. feet to an existing angle iron;

THENCE, North 80 degrees 31 minutes West along the line of lands now or formerly of Donald J. & Thelma Salada, a distance of 168.66 feet to an existing angle iron;

THENCE, North 89 Degrees 24 minutes West along the line of lands now or formerly of Donald J. & Thelma Salada, and the eastern line of lands of the Clearfield County Industrial Development Authority, a distance of 218.69 feet to an existing one inch iron pipe; said iron pipe being the northeastern corner of the herein described parcel,

THENCE, South 79 degrees 38 minutes along the southern line of lands of Dennis L. & Janice Salada, a distance of 294.34 feet to a power pole, said pole being on the northern line of lands of the herein described parcel;

THENCE, North 89 degrees 45 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 149.96 feet to a one inch iron pipe;

THENCE, South 00 degrees 31 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 34.17 feet to a one inch iron pipe;

THENCE, North 89 degrees 45 minutes East and continuing along the southern line of lands of Dennis L. & Janice Salada, a distance of 694.23 feet to a one inch iron pipe, said iron pipe being on the western line of lands now or formerly of R. Kirby & Cathy M. Nupp, (Deed Book 1230-351) and being the northeast corner of the herein described parcel;

THENCE, South 01 degrees 05 minutes East along the western line of lands now or formerly of R. Kirby & Cathy Nupp, a distance of 299.01 feet to an existing iron pipe; said iron pipe being the southwest corner of lands now or formerly of R. Kirby & Cathy M. Nupp; said pipe also being the southeast corner of the herein described parcel, and point of beginning.

BEING known as 303 E. Maloney Road.

BEING tax parcel # 128-B04-130.

BEING the same premises which Donald J. Salada & Thelma Salada, husband and wife, by Deed dated September 18, 2000 and recorded September 21, 2000 inst. #200014015 in the Clearfield County Office of the Recorder of Deeds.

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME CHRISTINE D. DELONG

NO. 04-1794-CD

NOW, August 12, 2011, 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 April 01, 2011, I exposed the within described real estate of Christine D. Delong 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	15.00
SERVICE	15.00
MILEAGE	19.00
LEVY	15.00
MILEAGE	19.00
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	7.04
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	
DEED	
ADD'L POSTING	
ADD'L MILEAGE	19.00
ADD'L LEVY	
BID/SETTLEMENT AMOUNT	
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	1.26
CONTINUED SALES	
MISCELLANEOUS	
TOTAL SHERIFF COSTS	\$210.30

DEED COSTS:

ACKNOWLEDGEMENT	
REGISTER & RECORDER	
TRANSFER TAX 2%	0.00
TOTAL DEED COSTS	\$0.00

PLAINTIFF COSTS, DEBT AND INTEREST:

DEBT-AMOUNT DUE	91,815.79
INTEREST @	0.00
FROM TO 04/01/2011	
ATTORNEY FEES	
PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	20.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	36,736.56
MISCELLANEOUS	(32,632.73)
TOTAL DEBT AND INTEREST	\$95,939.62

COSTS:

ADVERTISING	1,778.70
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
ASSESSMENT FEE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	
DEED COSTS	0.00
SHERIFF COSTS	210.30
LEGAL JOURNAL COSTS	351.00
PROTHONOTARY	132.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
TOTAL COSTS	\$2,612.00

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

RICHARD M. SQUIRE & ASSOCIATES, LLC
ATTORNEYS AT LAW

Richard M. Squire *
M. Troy Freedman
Andrew P. Sonin**

* Also Admitted in MD
^ Also Admitted in NJ

Montgomery County Office

One Jenkintown Station

115 West Avenue, Suite 104

Jenkintown, PA 19046

Tel.: (215) 886-8790 Fax: (215) 886-8791

www.squirelaw.com

Chester County Office

33 South Brick Lane

Elverson, PA 19520

Tel.: (610) 913-8442

Fax: (610) 913-6381

Please reply to: Montgomery County Office

November 29, 2010

Via Facsimile: 814-765-6089

Clearfield County Sheriff

Attn.: Real Estate Division

RE: Deutsche Bank National Trust v. Christing DeLong

Docket No. 04-1794-CD

Property situated at: 303 E. Maloney Rd., Dubois, PA

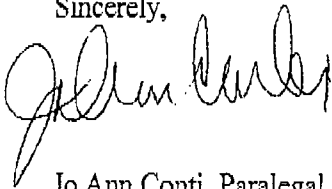
Sheriff sale scheduled for December 3, 2010

Dear Sir/Madam:

Please be advised that this office represents the Plaintiff, Deutsche Bank National Trust, in connection with the above-referenced mortgage foreclosure proceeding. ***Kindly postpone the sheriff's sale in this matter to January 7, 2011.***

If you have any questions, please do not hesitate to contact this office.

Sincerely,



Jo Ann Conti, Paralegal

cc: Pat miller

RICHARD M. SQUIRE & ASSOCIATES, LLC
ATTORNEYS AT LAW

Richard M. Squire *
M. Troy Freedman
Andrew P. Souza**

* Also Admitted in MD
* Also Admitted in NJ

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Chester County Office

**33 South Brick Lane
Elverson, PA 19520
Tel.: (610) 913-8442
Fax: (610) 913-6381**

Please reply to: Montgomery County Office

January 5, 2011

Via Facsimile: 814-765-6089

Clearfield County Sheriff
Attn.: Real Estate Division

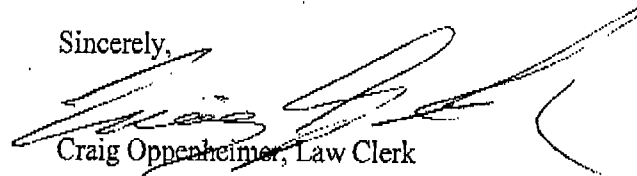
RE: Deutsche Bank National Trust v. Christing DeLong
Docket No. 04-1794-CD
Property situated at: 303 E. Maloney Rd., Dubois, PA
Sheriff sale scheduled for January 4, 2011

Dear Sir/Madam:

Please be advised that this office represents the Plaintiff, Deutsche Bank National Trust, in connection with the above-referenced mortgage foreclosure proceeding. ***Kindly postpone the sheriff's sale in this matter to April 1, 2011 at the request of our client.***

If you have any questions, please do not hesitate to contact this office.

Sincerely,



Craig Oppenheimer, Law Clerk

cc: Pat miller

RICHARD M. SQUIRE & ASSOCIATES, LLC
ATTORNEYS AT LAW

Richard M. Squire *
M. Troy Freedman
Christing C. Viola ^

* Also Admitted in MD
^ Also Admitted in NJ

Montgomery County Office

**One Jenkintown Station
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Jenkintown, PA 19046**

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Chester County Office

**33 South Brick Lane
Elverson, PA 19520
Tel.: (610) 913-8442
Fax: (610) 913-8381**

Please reply to: Montgomery County Office

March 30, 2011

Via Facsimile: 814-765-6089

Clearfield County Sheriff
Attn.: Real Estate Division

RE: Deutsche Bank National Trust v. Christing DeLong
Docket No. 04-1794-CD
Property situated at: 303 E. Maloney Rd., Dubois, PA
Sheriff sale scheduled for April 1, 2011

Dear Sir/Madam:

Please be advised that this office represents the Plaintiff, Deutsche Bank National Trust, in connection with the above-referenced mortgage foreclosure proceeding. ***Kindly stay the sheriff sale at the request of our client. There has been no consideration received.***

If you have any questions, please do not hesitate to contact this office.

Sincerely,


Craig Oppenheimer, Law Clerk

cc: Pat miller