

2004-1835-CD
WACHOVIA BANK NA

VS

JENNIFER SUHONEY

Wachovia Bank vs Jennifer Suhoney
2004-1835-CD

GOLDBECK McCAFFERTY & McKEEVER
BY: JOSEPH A. GOLDBECK, JR.
ATTORNEY I.D. #16132
SUITE 5000 MELLON INDEPENDENCE CENTER
701 Market Street
PHILADELPHIA, PA 19106
(215) 627-1322
ATTORNEY FOR PLAINTIFF

WACHOVIA BANK NA AS TRUSTEE
9441 LBJ Freeway
Suite 350
Dallas, TX 75243

Plaintiff

vs.

JENNIFER SUHONEY
and OCCUPANTS
Box 72
Smokerun, PA 16681

Defendants

IN THE COURT OF COMMON PLEAS
OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF EJECTMENT

Term
No. 04-1835-CJ

NOTICE CIVIL ACTION: EJECTMENT

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 the 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 claim in the Complaint of for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

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PENNSYLVANIA BAR ASSOCIATION
P.O. Box 186, Harrisburg, PA 17108
800-692-7375

KEYSTONE LEGAL SERVICES
211 1/2 E. Locust Street, Clearfield, PA 16830
814-765-9646

A V I S O

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESSARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESSARIO QUE USTED, O SU ABOGADO, REGISTRE CON LA CORTE EN FORMA ESCRITA, EL PUNTO DE VISTA DE USTED Y CUALQUIER OBJECCION CONTRA LAS QUEJAS EN ESTA DEMANDA.

RECUEERDE: SI USTED NO REPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIRA QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

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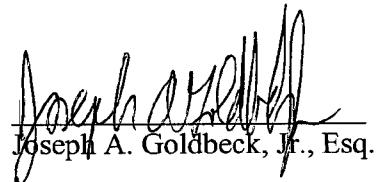
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NOV 18 2004 2cc Shff
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William A. Shaw
Prothonotary/Clerk of Courts

COMPLAINT IN EJECTMENT

1. Plaintiff is WACHOVIA BANK NA AS TRUSTEE, 9441 LBJ Freeway, Suite 350, Dallas, TX 75243.
2. Defendants are JENNIFER SUHONEY, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises Box 72, Smokerun, PA 16681 a legal description of which is attached hereto.
4. Plaintiff became the equitable owner of said premises as a result of foreclosure and judicial sale by the Sheriff of Clearfield County on November 05, 2004.
5. Plaintiff, by virtue of the above, is the equitable owner of said premises, and is entitled to possession thereof. The Defendants, JENNIFER SUHONEY and OCCUPANTS, are occupying the said premises without right, and so far as the Plaintiff is informed, without claim of title.
6. Plaintiff has demanded possession of the said premises from the said Defendants, who have refused to deliver up possession of the same.

WHEREFORE, Plaintiff requests judgment for possession of the premises.

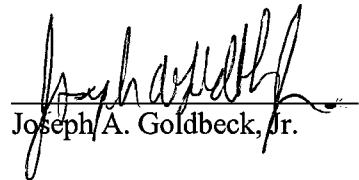


Joseph A. Goldbeck, Jr., Esq.

VERIFICATION

I, Joseph A. Goldbeck, Jr. as the Attorney of the Plaintiff corporation within named do hereby verify that I am authorized to and do make this verification on behalf of the Plaintiff corporation and the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: 11/16/04



Joseph A. Goldbeck, Jr.

#320068604 - JENNIFER SUHONEY

EXHIBIT "A"

ALL that certain plot or piece of ground located on the West side of State Highway in the Village of Smoke Run, Bigler Township, Clearfield County, Pennsylvania, which was designated as Lots Numbered 4, 5, and 6 by a predecessor in title in the plot or plan of the Village of Beyer, and bounded and described as follows:

BEGINNING at the South West corner of the intersection of Centre Street and State Highway; thence North 28 1/2 degrees West along Centre Street one hundred and fifty (150) feet to an alley; thence South 61 1/2 degrees West along said Alley one hundred and fifty (150) feet to another Alley; thence South 28 1/2 degrees East along last mentioned Alley one hundred and fifty (150) feet to State Highway; thence North 61 1/2 degrees East along said State Highway one hundred and fifty (150) feet to corner at Centre Street and place of beginning. MAP #103-K15-496-00025.

BEING the same premises conveyed by Betty Tutokey, a widow, and Genevieve Lehmier, a widow, to Jennifer Suhoney, an individual, by deed dated November 21, 2002 and recorded November 21, 2002, in Clearfield County, at Instrument Number

_____.

Jennifer Suhoney

Box 72 ~~Smoke~~

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 2 Services

Sheriff Docket # **100013**

Case # 04-1835-CD

WACHOVIA BANK NA

vs.

JENNIFER SUHONEY

SHERIFF RETURNS

NOW January 20, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT
"NOT FOUND" AS TO JENNIFER SUHONEY, DEFENDANT. HOUSE EMPTY.

SERVED BY: /

FILED

JAN 20 2005 6¹⁴

6/3:45/05
William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 2 of 2 Services

Sheriff Docket # **100013**

Case # 04-1835-CD

WACHOVIA BANK NA

vs.

JENNIFER SUHONEY

SHERIFF RETURNS

NOW January 20, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO OCCUPANT(S) (SUHONEY PROPERTY), DEFENDANT. HOUSE EMPTY.

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	213012	20.00
SHERIFF HAWKINS	GOLDBECK	213012	36.25

Sworn to Before me This

____ Day of _____ 2005

So Answers,


Chester A. Hawkins
Sheriff

GOLDBECK McCAFFERTY & McKEEVER
BY: JOSEPH A. GOLDBECK, JR.
ATTORNEY I.D. #16132
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701 Market Street
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ATTORNEY FOR PLAINTIFF

I HEREBY CERTIFY THAT THIS IS
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9441 LBJ Freeway
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Plaintiff

vs.

JENNIFER SUHONEY
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Box 72
Smokerun, PA 16681

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NOV 18 2004

Attest.

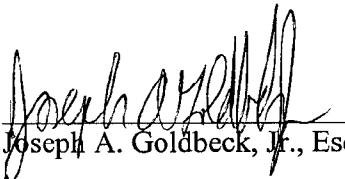
John B. Rau
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6. Plaintiff has demanded possession of the said premises from the said Defendants, who have refused to deliver up possession of the same.

WHEREFORE, Plaintiff requests judgment for possession of the premises.

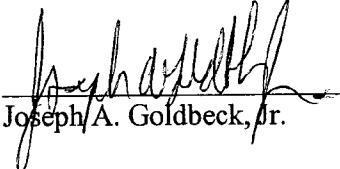


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Date: 11/16/04



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#320068604 - JENNIFER SUHONEY

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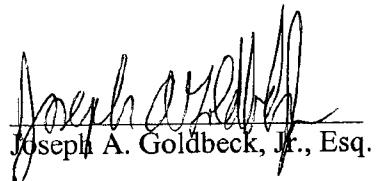
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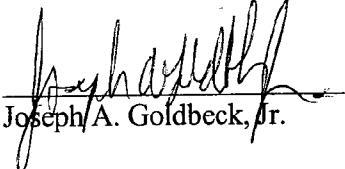


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Jennifer Suhoney
Box 72 Smoke

GOLDBECK McCAFFERTY & McKEEVER
A Professional Corporation
Suite 5000 - Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532
www.goldbecklaw.com

November 14, 2006

PROTHONOTARY OF CLEARFIELD COUNTY
William Shaw
Prothonotary of Clearfield County
230 E. Market Street
Clearfield, PA 16830

RE: Docket Number: Term; No.: 04-1835-CD

To the Prothonotary:

Kindly file of record the enclosed Praeclipe to Discontinue and End.

A time stamped copy does **not** need to be returned to our office.

Goldbeck McCafferty & McKeever
Barbara Roach
Manager – Eviction Dept.
215-825-6319 (direct phone)
215-825-6419 (Eviction Dept. Fax)
broach@goldbecklaw.com (email)
215-627-1322 – Main Number

8/15

Enclosures

cc:

GOLDBECK McCAFFERTY & MCKEEVER

BY: Joseph A. Goldbeck, Jr.
Attorney I.D. #16132
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532
215-825-6319
Attorney for Plaintiff

WACHOVIA BANK NA AS TRUSTEE
9441 LBJ Freeway
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Dallas, TX 75243

Plaintiff

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and OCCUPANTS
Box 72
Smokerun, PA 16681

IN THE COURT OF COMMON PLEAS

of Clearfield County

No. 04-1835-CD

PRAECIPE TO DISCONTINUE AND END

TO THE PROTHONOTARY:

Kindly mark the above case Discontinued and Ended upon payment of your costs only.



JOSEPH A. GOLDBECK, JR., ESQUIRE

FILED

NOV 17 2006

12:00 PM

William A. Shaw
Prothonotary/Clerk of Courts