

04-1962-CD  
COUNTRYWIDE HOME LOANS, INC. vs. BENNY J. BAKER, et al.

Countrywide vs Benny Baker et al  
2004-1962-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

COUNTRYWIDE HOME LOANS INC.  
7105 Corporate Drive  
PTX C-35  
Plano, TX 75024-3632

Plaintiff

vs.

BENNY J. BAKER  
LINDA L. BAKER  
and OCCUPANTS  
P.O. Box 103 Locust Street  
a/k/a 43 Locust Street a/k/a P.O. Box 164  
Mahaffey, PA 15757

Defendants

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF EJECTMENT

Term  
No.

04-1962-CJ

## CIVIL ACTION: EJECTMENT

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

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

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

### AVISO

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.

RECUERDE: 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 REQUERIR 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.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATEAMENTE.

SI NO CONOCE A UN ABOGADO, LLAME AL "LAWYER REFERENCE SERVICE" (SERVICIO DE REFERENCIA DE ABOGADOS), (215) 238-6300.

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

**FILED**  
M 1/44 2004 Pd 85.00  
300 to Shaff

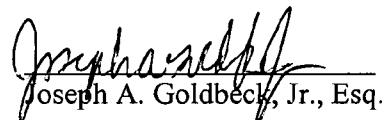
DEC 10 2004

William A. Shaw  
Prothonotary

COMPLAINT IN EJECTMENT

1. Plaintiff is COUNTRYWIDE HOME LOANS INC., 7105 Corporate Drive, PTX C-35, Plano, TX 75024-3632.
2. Defendants are BENNY J. BAKER, LINDA L. BAKER, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises P.O. Box 103 Locust Street, a/k/a 43 Locust Street a/k/a P.O. Box 164 Mahaffey, PA 15757 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 December 03, 2004.
5. Plaintiff, by virtue of the above, is the equitable owner of said premises, and is entitled to possession thereof. The Defendants, BENNY J. BAKER, LINDA L. BAKER 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.

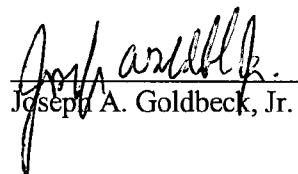


Joseph A. Goldbeck, Jr., Esq.

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: 12/9/04

  
Joseph A. Goldbeck, Jr.

#806134 - BENNY J. BAKER and LINDA L. BAKER

Legal Description: (As shown on Mortgage)

ALL THAT CERTAIN PIECE, PARCEL AND LOT OF LAND SITUATE, LYING AND BEING IN THE BOROUGH OF MAHAFFEY, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO-WIT:

BOUNDED ON THE NORTH BY LOCUST STREET;  
BOUNDED ON THE SOUTH BY AN ALLEY AND A P. & N. W. RAILROAD RIGHT OF WAY;  
BOUNDED ON THE EAST BY AN ALLEY; AND  
BOUNDED ON THE WEST BY P. & N. W. RAILROAD RIGHT OF WAY.

BEING A PARCEL OF LAND TRIANGULAR IN SHAPE AND KNOWN AS LOTS NOS. 28 AND 29 IN THE PLAN OF LOTS FOR THE WESTERN PART OF THE BOROUGH OF MAHAFFEY.

BEING DESIGNATED AS TAX IDENTIFICATION NUMBER C11-303-00033.

Linda L Baker

P.O Box 103 Locust St

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

Service # 1 of 3 Services

Sheriff Docket # **100058**

Case # 04-1962-CD

COUNTRYWIDE HOME LOANS INC

vs.

BENNY J. BAKER, LINDA L. BAKER and OCCUPANTS

**SHERIFF RETURNS**

NOW January 24, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT  
"NOT FOUND" AS TO BENNY J. BAKER, DEFENDANT. DECEASED.

SERVED BY: /

GR  
018:4984 NO  
JAN 25 2005  
V. D. G.  
Prothonotary Clerk

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

Service # 2 of 3 Services

Sheriff Docket # **100058**

Case # 04-1962-CD

COUNTRYWIDE HOME LOANS INC

vs.

BENNY J. BAKER, LINDA L. BAKER and OCCUPANTS

**SHERIFF RETURNS**

NOW January 24, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT  
"NOT FOUND" AS TO LINDA L. BAKER, DEFENDANT. HOUSE EMPTY.

SERVED BY: /

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

Service # 3 of 3 Services

Sheriff Docket # **100058**

Case # 04-1962-CD

COUNTRYWIDE HOME LOANS INC

vs.

BENNY J. BAKER, LINDA L. BAKER and OCCUPANTS

**SHERIFF RETURNS**

NOW January 24, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT "NOT FOUND" AS TO OCCUPANT (BAKER PROPERTY), DEFENDANT. HOUSE EMPTY.

SERVED BY: /

**Return Costs**

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	214401	30.00
SHERIFF HAWKINS	GOLDBECK	214401	40.50

Sworn to Before me This

So Answers,

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

  
Chester A. Hawkins  
Sheriff

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

I HEREBY CERTIFY THAT THIS IS  
A TRUE AND CORRECT COPY OF  
THE ORIGINAL FILED

COUNTRYWIDE HOME LOANS INC.  
7105 Corporate Drive  
PTX C-35  
Plano, TX 75024-3632

Plaintiff

vs.

BENNY J. BAKER  
LINDA L. BAKER  
and OCCUPANTS  
P.O. Box 103 Locust Street  
a/k/a 43 Locust Street a/k/a P.O. Box 164  
Mahaffey, PA 15757

Defendants

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF EJECTMENT

Term  
No.

04-1962-C

CIVIL ACTION: EJECTMENT

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

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

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

AVISO

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESARIO 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.

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

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATEAMENTE.

SI NO CONOCE A UN ABOGADO, LLAME AL "LAWYER REFERENCE SERVICE" (SERVICIO DE REFERENCIA DE ABOGADOS), (215) 238-6300.

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

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

DEC 10 2004

Attest.

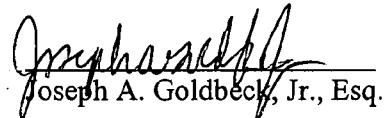
*William E. Ober*  
Prothonotary/  
Clerk of Courts

I HEREBY CERTIFY THAT THIS IS  
A TRUE AND CORRECT COPY OF  
THE ORIGINAL FILED

COMPLAINT IN EJECTMENT

1. Plaintiff is COUNTRYWIDE HOME LOANS INC., 7105 Corporate Drive, PTX C-35, Plano, TX 75024-3632.
2. Defendants are BENNY J. BAKER, LINDA L. BAKER, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises P.O. Box 103 Locust Street, a/k/a 43 Locust Street a/k/a P.O. Box 164 Mahaffey, PA 15757 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 December 03, 2004.
5. Plaintiff, by virtue of the above, is the equitable owner of said premises, and is entitled to possession thereof. The Defendants, BENNY J. BAKER, LINDA L. BAKER 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.

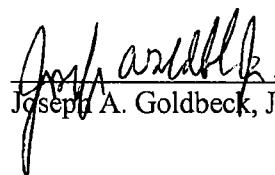


Joseph A. Goldbeck, Jr., Esq.

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: 12/9/04

  
\_\_\_\_\_  
Joseph A. Goldbeck, Jr.

#806134 - BENNY J. BAKER and LINDA L. BAKER

Legal Description: (As shown on Mortgage)

ALL THAT CERTAIN PIECE, PARCEL AND LOT OF LAND SITUATE, LYING AND BEING IN THE BOROUGH OF MAHAFFEY, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO-WIT:

BOUNDED ON THE NORTH BY LOCUST STREET;  
BOUNDED ON THE SOUTH BY AN ALLEY AND A P. & N. W. RAILROAD RIGHT OF WAY;  
BOUNDED ON THE EAST BY AN ALLEY; AND  
BOUNDED ON THE WEST BY P. & N. W. RAILROAD RIGHT OF WAY.

BEING A PARCEL OF LAND TRIANGULAR IN SHAPE AND KNOWN AS LOTS NOS. 28 AND 29 IN THE PLAN OF LOTS FOR THE WESTERN PART OF THE BOROUGH OF MAHAFFEY.

BEING DESIGNATED AS TAX IDENTIFICATION NUMBER C11-303-00033.

Linda L Baker

P.O Box 103 Locust St

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

I HEREBY CERTIFY THAT THIS IS  
A TRUE AND CORRECT COPY OF  
THE ORIGINAL FILED

COUNTRYWIDE HOME LOANS INC.  
7105 Corporate Drive  
PTX C-35  
Plano, TX 75024-3632

Plaintiff

vs.

BENNY J. BAKER  
LINDA L. BAKER  
and OCCUPANTS  
P.O. Box 103 Locust Street  
a/k/a 43 Locust Street a/k/a P.O. Box 164  
Mahaffey, PA 15757

Defendants

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF EJECTMENT

Term  
No.

04-1962-C

CIVIL ACTION: EJECTMENT

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

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

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

AVISO

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESARIO 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.

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

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATEAMENTE.

SI NO CONOCE A UN ABOGADO, LLAME AL "LAWYER REFERENCE SERVICE" (SERVICIO DE REFERENCIA DE ABOGADOS), (215) 238-6300.

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

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

DEC 10 2004

Attest.

*William J. Brown*  
Prothonotary/  
Clerk of Courts

I HEREBY CERTIFY THAT THIS IS  
A TRUE AND CORRECT COPY OF  
THE ORIGINAL FILED

COMPLAINT IN EJECTMENT

1. Plaintiff is COUNTRYWIDE HOME LOANS INC., 7105 Corporate Drive, PTX C-35, Plano, TX 75024-3632.
2. Defendants are BENNY J. BAKER, LINDA L. BAKER, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises P.O. Box 103 Locust Street, a/k/a 43 Locust Street a/k/a P.O. Box 164 Mahaffey, PA 15757 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 December 03, 2004.
5. Plaintiff, by virtue of the above, is the equitable owner of said premises, and is entitled to possession thereof. The Defendants, BENNY J. BAKER, LINDA L. BAKER 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.

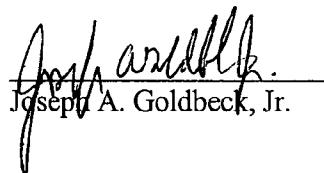


Joseph A. Goldbeck, Jr., Esq.

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: 12/9/04

  
Joseph A. Goldbeck, Jr.

#806134 - BENNY J. BAKER and LINDA L. BAKER

Legal Description: (As shown on Mortgage)

ALL THAT CERTAIN PIECE, PARCEL AND LOT OF LAND SITUATE, LYING AND BEING IN THE BOROUGH OF MAHAFFEY, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO-WIT:

BOUNDED ON THE NORTH BY LOCUST STREET;  
BOUNDED ON THE SOUTH BY AN ALLEY AND A P. & N. W. RAILROAD RIGHT OF WAY;  
BOUNDED ON THE EAST BY AN ALLEY; AND  
BOUNDED ON THE WEST BY P. & N. W. RAILROAD RIGHT OF WAY.

BEING A PARCEL OF LAND TRIANGULAR IN SHAPE AND KNOWN AS LOTS NOS. 28 AND 29 IN THE PLAN OF LOTS FOR THE WESTERN PART OF THE BOROUGH OF MAHAFFEY.

BEING DESIGNATED AS TAX IDENTIFICATION NUMBER C11-303-00033.

Linda L Baker

P.O Box 103 Locust St

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

I HEREBY CERTIFY THAT THIS IS  
A TRUE AND CORRECT COPY OF  
THE ORIGINAL FILED

COUNTRYWIDE HOME LOANS INC.  
7105 Corporate Drive  
PTX C-35  
Plano, TX 75024-3632

Plaintiff

vs.

BENNY J. BAKER  
LINDA L. BAKER  
and OCCUPANTS  
P.O. Box 103 Locust Street  
a/k/a 43 Locust Street a/k/a P.O. Box 164  
Mahaffey, PA 15757

Defendants

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF EJECTMENT

Term  
No.

04-1962-CD

CIVIL ACTION: EJECTMENT

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

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

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.

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

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATEAMENTE.

SI NO CONOCE A UN ABOGADO, LLAME AL "LAWYER REFERENCE SERVICE" (SERVICIO DE REFERENCIA DE ABOGADOS), (215) 238-6300.

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

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

DEC 10 2004

Attest.

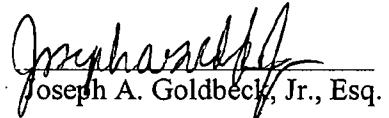
*William L. Brown*  
Prothonotary/  
Clerk of Courts

I HEREBY CERTIFY THAT THIS IS  
A TRUE AND CORRECT COPY OF  
THE ORIGINAL FILED

COMPLAINT IN EJECTMENT

1. Plaintiff is COUNTRYWIDE HOME LOANS INC., 7105 Corporate Drive, PTX C-35, Plano, TX 75024-3632.
2. Defendants are BENNY J. BAKER, LINDA L. BAKER, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises P.O. Box 103 Locust Street, a/k/a 43 Locust Street a/k/a P.O. Box 164 Mahaffey, PA 15757 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 December 03, 2004.
5. Plaintiff, by virtue of the above, is the equitable owner of said premises, and is entitled to possession thereof. The Defendants, BENNY J. BAKER, LINDA L. BAKER 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.

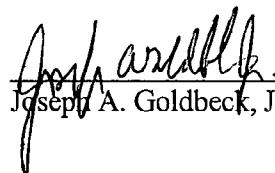


Joseph A. Goldbeck, Jr., Esq.

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: 12/9/04

  
\_\_\_\_\_  
Joseph A. Goldbeck, Jr.

#806134 - BENNY J. BAKER and LINDA L. BAKER

Legal Description: (As shown on Mortgage)

ALL THAT CERTAIN PIECE, PARCEL AND LOT OF LAND SITUATE, LYING AND BEING IN THE BOROUGH OF MAHAFFEY, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO-WIT:

BOUNDED ON THE NORTH BY LOCUST STREET;  
BOUNDED ON THE SOUTH BY AN ALLEY AND A P. & N. W. RAILROAD RIGHT OF WAY;  
BOUNDED ON THE EAST BY AN ALLEY; AND  
BOUNDED ON THE WEST BY P. & N. W. RAILROAD RIGHT OF WAY.

BEING A PARCEL OF LAND TRIANGULAR IN SHAPE AND KNOWN AS LOTS NOS. 28 AND 29 IN THE PLAN OF LOTS FOR THE WESTERN PART OF THE BOROUGH OF MAHAFFEY.

BEING DESIGNATED AS TAX IDENTIFICATION NUMBER C11-303-00033.

Linda L Baker

P.O Box 103 Locust St

**GOLDBECK McCAFFERTY & McKEEVER**  
A Professional Corporation  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532  
[www.goldbecklaw.com](http://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.: 04-1962-cd

To the Prothonotary:

Kindly file of record the enclosed Praecipe 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](mailto:broach@goldbecklaw.com) (email)  
215-627-1322 – Main Number

OK

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

COUNTRYWIDE HOME LOANS INC.  
7105 Corporate Drive  
PTX C-35  
Plano, TX 75024-3632

Plaintiff

vs.

BENNY J. BAKER  
LINDA L. BAKER  
**and OCCUPANTS**  
P.O. Box 103 Locust Street a/k/a 43 Locust  
Street  
a/k/a P.O. Box 164  
Mahaffey, PA 15757

IN THE COURT OF COMMON PLEAS  
of Clearfield County

No. 04-1962-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

m/2200/ma

William A. Shaw  
Prothonotary/Clerk of Courts