

04-1994-CD
BENEFICIAL CONSUMER DISCOUNT COMPANY, et al. vs. LINDA L. PLUNKETT

Beneficial Cons vs Linda Plunkett et al
2004-1994-CD

McCABE, WEISBERG AND CONWAY, P.C.
BY: TERRENCE J. McCABE, ESQUIRE
Identification Number 16496
123 South Broad Street, Suite 2080
Philadelphia, Pennsylvania 19109
(215) 790-1010

Attorney for Plaintiff

Beneficial Consumer Discount Company
d/b/a Beneficial Mortgage Co. of
Pennsylvania
961 Weigel Drive
P.O. Box 8621
Elmhurst, IL 60126

v.

Linda L. Plunkett a/k/a Linda L. Dowd
278 Atlantic Avenue
Houtzdale, PA 16651

and

Roy A. Plunkett
278 Atlantic Avenue
Houtzdale, PA 16651

Clearfield County
Court of Common Pleas

FILED
01:40PM 1cc to atty
2cc to clerk
DEC 17 2004

William A. Shaw
Prothonotary

Number 04-1994-CD

CIVIL ACTION/MORTGAGE FORECLOSURE

NOTICE

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Dave Meholic
Court Administrator
Clearfield County Courthouse
230 East Market Street
Clearfield, PA, 16830
814-765-2641 x 5982

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas ex-puestas 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. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

USTED LE DEBE TOMAR ESTE PAPEL A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE A UN ABOGADO, VA A O TELEFONEA LA OFICINA EXPUSO ABAJO. ESTA OFICINA LO PUEDE PROPORCIONAR CON INFORMACION ACERCA DE EMPLEAR A UN ABOGADO.

SI USTED NO PUEDE PROPORCIONAR PARA EMPLEAR UN ABOGADO, ESTA OFICINA PUEDE SER CAPAZ DE PROPORCIONARLO CON INFORMACION ACERCA DE LAS AGENCIAS QUE PUEDEN OFRECER LOS SERVICIOS LEGALES A PERSONAS ELEGIBLES EN UN HONORARIO REDUCIDO NI NINGUN HONORARIO.

Dave Meholic
Court Administrator
Clearfield County Courthouse
230 East Market Street
Clearfield, PA, 16830
814-765-2641 x 5982

McCABE, WEISBERG AND CONWAY, P.C.

BY: TERRENCE J. McCABE, ESQUIRE

Attorney for Plaintiff

Identification Number 16496

123 South Broad Street, Suite 2080

Philadelphia, Pennsylvania 19109

(215) 790-1010

Beneficial Consumer Discount
Company d/b/a Beneficial
Mortgage Co. of Pennsylvania
961 Weigel Drive
P.O. Box 8621
Elmhurst, IL 60126

v.

Linda L. Plunkett a/k/a
Linda L. Dowd
278 Atlantic Avenue
Houtzdale, PA 16651

and

Roy A. Plunkett
278 Atlantic Avenue
Houtzdale, PA 16651

Clearfield County
Court of Common Pleas

Number

CIVIL ACTION/MORTGAGE FORECLOSURE

1. Plaintiff is Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania, a corporation duly organized under the laws of Pennsylvania and doing business at the above captioned address.

2. The Defendant is Linda L. Plunkett a/k/a Linda L. Dowd, who is one of the mortgagors and real owners of the mortgaged property hereinafter described, and her last-known address is 278 Atlantic Avenue, Houtzdale, PA 16651.

3. The Defendant is Roy A. Plunkett, who is one of the mortgagors and real owners of the mortgaged property hereinafter described, and his last-known address is 278 Atlantic Avenue, Houtzdale, PA 16651.

4. On 08/24/2000, mortgagors made, executed and delivered a mortgage upon the premises hereinafter described to Plaintiff which mortgage is recorded in the Office of the Recorder of Clearfield County under Instrument #200012496.

5. The premises subject to said mortgage is described in the mortgage attached as Exhibit "A" and is known as RD 1 Box 354, Houtzdale, PA 16651.

6. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 06/01/2004 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon default in such payments for a period of one month, the entire principal balance and all interest due thereon are collectible forthwith.

7. The following amounts are due on the mortgage:

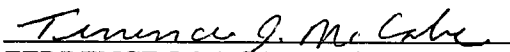
Principal Balance	\$ 47,968.64
Interest through 11/05/2004 (Plus \$ 16.63 per diem thereafter)	\$ 5,386.26
Attorney's Fee	\$ 2,398.43
Cost of Suit	\$ 225.00
Appraisal Fee	\$ 125.00
Title Search	\$ 200.00
GRAND TOTAL	\$ 56,303.33

8. The attorney's fees set forth above are in conformity with the mortgage documents and Pennsylvania Law and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged based on work actually performed.

9. Notice of Intention to Foreclose as required by Act 6 of 1974 (41 P.S. §403) and notice required by the Emergency Mortgage Assistance Act of 1983 as amended under 12 PA Code

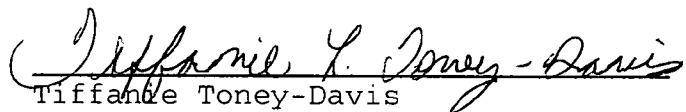
Chapter 13, et seq., commonly known as the Combined Notice of Delinquency has been sent to Defendants by regular mail with a certificate of mailing and by certified mail, return receipt requested.

WHEREFORE, Plaintiff demands Judgment against the Defendants in the sum of \$56,303.33, together with interest at the rate of \$16.63 per diem and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.


TERRENCE J. McCABE, ESQUIRE
Attorney for Plaintiff

VERIFICATION

The undersigned, Tiffanie Toney-Davis, hereby certifies that she is the Foreclosure Specialist of the Plaintiff in the within action, Beneficial Consumer Discount Company, and that she is authorized to make this verification and that the foregoing facts are true and correct to the best of her knowledge, information and belief and further states that false statements herein are made subject to the penalties of 18 PA.C.S. §4904 relating to unsworn falsification to authorities.


Tiffanie Toney-Davis

711806

MORTGAGE

☐ IF BOX IS CHECKED, THIS MORTGAGE IS AN OPEN-END MORTGAGE AND SECURES FUTURE ADVANCES.

THIS MORTGAGE is made this day 24TH of AUGUST 2000, between the Mortgagor, LINDA L. DOWD A/K/A LINDA L. PLUNKETT AND ROY A. PLUNKETT

(herein "Borrower") and Mortgagee BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE CO OF PENNSYLVANIA a corporation organized and existing under the laws of PENNSYLVANIA, 1067 PENNSYLVANIA AVENUE, TYRONE, PA 16886, whose address is (herein "Lender").

The following paragraph preceded by a checked box is applicable.

☒ WHEREAS, Borrower is indebted to Lender in the principal sum of \$ 51,508.20 evidenced by Borrower's Loan Repayment and Security Agreement or Secondary Mortgage Loan Agreement dated AUGUST 24, 2000 and any extensions or renewals thereof (herein "Note"), providing for monthly installments of principal and interest, including any adjustments to the amount of payments or the contract rate if that rate is variable, with the balance of the indebtedness, if not sooner paid, due and payable on AUGUST 24, 2030 :

☐ WHEREAS, Borrower is indebted to Lender in the principal sum of \$ _____, or so much thereof as may be advanced pursuant to Borrower's Revolving Loan Agreement dated _____ and extensions and renewals thereof (herein "Note"), providing for monthly installments, and interest at the rate and under the terms specified in the Note, including any adjustments in the interest rate if that rate is variable, and providing for a credit limit stated in the principal sum above and an initial advance of \$ _____ :

TO SECURE to Lender the repayment of (1) the indebtedness evidenced by the Note, with interest thereon, including any increases if the contract rate is variable; (2) future advances under any Revolving Loan Agreement; (3) the payment of all other sums, with interest thereon, advanced in accordance herewith to protect the security of this Mortgage; and (4) the performance of the covenants and agreements of Borrower herein contained, Borrower does hereby mortgage, grant and convey to Lender and Lender's successors and assigns the following described property located in the County of CLEARFIELD Commonwealth of Pennsylvania:

ALL THAT CERTAIN PROPERTY SITUATED IN THE TOWNSHIP OF BIGLER IN THE COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BEING MORE FULLY DESCRIBED IN A DEED DATED 09/10/1986 AND RECORDED 09/28/1986, AMONG THE LAND RECORDS OF THE COUNTY AND STATE SET FORTH ABOVE, IN DEED VOLUME 1111 AND PAGE 402 AND, TAX MAP OR PARCEL ID NO.: 103-L13-38

KAREN L. STARCK
REGISTER AND RECORDER
CLEARFIELD COUNTY
Pennsylvania

INSTRUMENT NUMBER

200012496

RECORDED ON

AUG 28, 2000

10:02:39 AM

RECORDING FEES - \$17.00

RECORDER

COUNTY IMPROVEMENT

FUND \$1.00

RECORDER

IMPROVEMENT FUND

STATE MIST TAX \$0.50

TOTAL \$19.50

Consolidated

Exhibit A

01-07-30 MTG

PA001281

XP98741648J96MTG9000PA001281D**PLUNKETT ORIGINAL

-6-

**REQUEST FOR NOTICE OF DEFAULT
AND FORECLOSURE UNDER SUPERIOR
MORTGAGES OR DEEDS OF TRUST**

Borrower and Lender request the holder of any mortgage, deed of trust or other encumbrance with a lien which has priority over this Mortgage to give Notice to Lender, at Lender's address set forth on page one of this Mortgage, of any default under the superior encumbrance and of any sale or other foreclosure action.

Linda R. Dowd A/K/A

Linda R. Plunkett

LINDA L. DOWD A/K/A

-Borrower

LINDA L. PLUNKETT

Roy A. Plunkett

ROY A. PLUNKETT

-Borrower

I hereby certify that the precise address of the Lender (Mortgagee) is:

1067 PENNSYLVANIA AVE., TYRONE, PA. 16686

On behalf of the Lender, By: LINDA S. MILLER Linda S. Miller Title: SA

COMMONWEALTH OF PENNSYLVANIA.

County ss: BLAIR

I, LINDA S. MILLER,

a Notary Public in and for said county and state, do hereby certify that

LINDA L. DOWD A/K/A LINDA L. PLUNKETT AND ROY A. PLUNKETT

personally known to me to be the same person(s) whose name(s) ARE subscribed to the foregoing instrument, appeared before me this day in person, and acknowledge that I he Y signed and delivered the said instrument as THEIR free voluntary act, for the uses and purposes therein set forth.

Given under my hand and official seal, this

24th

day of

AUGUST

, 20 00

My Commission expires:

Linda S. Miller

Notary Public

This instrument was prepared by:

LINDA S. MILLER

(Name)

1067 PENNSYLVANIA AVE., TYRONE, PA. 16686

(Address)

(Space Below This Line Reserved For Lender and Recorder)

Return To:
Records Processing Services
577 Lamont Road
Elmhurst, IL 60126

01-07-00 MTE

PA001285



MP98741646JB0MTC9000PA0012860M*PLUNKETT

ORIGINAL

DESCRIPTION

ALL THAT CERTAIN piece or parcel of ground situate, lying and being in the Township of Bigler, County of Clearfield and Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at an iron pipe, situate on the Southern side of LR 17047, and the Northwestern corner of land of Grantors; thence North Forty-three degrees Thirty-eight minutes East ($N 43^{\circ} 38' E$) Two Hundred Seventy-two and Thirty Hundredths (272.30') feet along the Southern side of LR 17047 to an iron pipe; thence South Twenty-nine degrees Forty-six minutes East ($S 29^{\circ} 46' E$) Four Hundred Ninety-two and Forty hundredths (492.40') feet to an iron pipe; thence South Sixty-six degrees One minutes West ($S 66^{\circ} 01' W$) Two Hundred Sixty and Sixty-five hundredths (260.65') feet to an iron pipe; thence North Thirty degrees Zero minutes West ($N 30^{\circ} 00' W$) Three Hundred Eighty-eight and Twenty-five hundredths (388.25') feet to iron pipe, and place of beginning. CONTAINING 2.63 acres. HAVING erected thereon a garage.

RESERVING all the coal and other minerals and mining rights as set forth in prior deeds in chain of title to said premises.

Being Parcel No. 103-L13-36

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100073
NO: 04-1994-CD
SERVICE # 1 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY

vs.

DEFENDANT: LINDA L. PLUNKETT a/k/a LINDA L. DOWD and ROY A. PLUNKETT

SHERIFF RETURN

NOW, January 05, 2005 AT 10:00 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON LINDA L. PLUNKETT a/k/a LINDA L. DOWD or OCCUPANT DEFENDANT AT 278 ATLANTIC AVE., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO ROY A. PLUNKETT, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED ⁶²
018:45/BL
FEB 03 2005

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100073
NO: 04-1994-CD
SERVICE # 2 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY

vs.

DEFENDANT: LINDA L. PLUNKETT a/k/a LINDA L. DOWD and ROY A. PLUNKETT

SHERIFF RETURN

NOW, January 05, 2005 AT 10:00 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON ROY A. PLUNKETT or OCCUPANT DEFENDANT AT 278 ATLANTIC AVE., HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO ROY PLUNKETT, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100073
NO: 04-1994-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY

vs.

DEFENDANT: LINDA L. PLUNKETT a/k/a LINDA L. DOWD and ROY A. PLUNKETT

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	McCABE	52492	20.00
SHERIFF HAWKINS	McCABE	52492	67.03

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
Suite 5000 - Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532
215-627-1322

AMQ-0166
03/18/2005
\$220,998.61

Attorney for Plaintiff

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE, OF AMERIQUEST MORTGAGE
SECURITIES, INC., ASSET-BACKED PASS
THROUGH CERTIFICATES, SERIES 2003-6, UNDER
THE POOLING AND SERVICING AGREEMENT
DATED AS OF MAY 1, 2003, WITHOUT RECOURSE
505 City Parkway West
Suite 100
Orange, CA 92868

Plaintiff

vs.

JOHN A. WORRELL JR.
Mortgagor(s) and
Record Owner(s)

430 Pine Swamp Road
Elverson, PA 19520

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Chester County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term

No. 04-01994

FILED *no cc*
MT:4484
FEB 28 2005
William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE
PURSUANT TO Pa.R.C.P. 3129.2 (c) (2)

Joseph A. Goldbeck, Jr., Esquire, Attorney for Plaintiff, hereby certifies that service on the Defendants of the Notice of Sheriff Sale was made by:

- () Personal Service by the Sheriff's Office/competent adult (copy of return attached).
- () Certified mail by Joseph A. Goldbeck, Jr. (original green Postal return receipt attached).
- () Certified mail by Sheriff's Office.
- () Ordinary mail by Joseph A. Goldbeck, Jr., Esquire to Attorney for Defendant(s) of record (proof of mailing attached).
- () Acknowledgment of Sheriff's Sale by Attorney for Defendant(s) (proof of acknowledgment attached).
- () Ordinary mail by Sheriff's Office to Attorney for Defendant(s) of record.

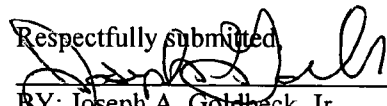
IF SERVICE WAS ACCOMPLISHED BY COURT ORDER.

- ☒ Premises was posted by ~~Sheriff's Office~~/competent adult (copy of return attached).
- () Certified Mail & ordinary mail by Sheriff's Office (copy of return attached).
- ☒ Certified Mail & ordinary mail by Joseph A. Goldbeck, Jr. (original receipt(s) for Certified Mail attached).

Pursuant to the Affidavit under Rule 3129 (copy attached), service on all lienholders (if any) has been made by ordinary mail by Joseph A. Goldbeck, Jr., Esquire (copies of proofs of mailing attached).

The undersigned understands that the statements herein are subject to the penalties provided by 18 P.S. Section 4904.

Respectfully submitted,


BY: Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

7160 3901 9848 3827 0358

TO: · WORRELL JR., JOHN A.
JOHN A. WORRELL JR.
430 Pine Swamp Road
Elverson, PA 19520

SENDER: GOLDBECK MCCAFFERTY & MCKEEVER
November 11, 2004

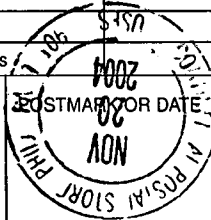
REFERENCE: WORRELL, JOHN A. JR. / AMQ-0166
03/18/05 – Chester

PS Form 3800, June 2000

RETURN RECEIPT SERVICE	Postage	
	Certified Fee	
	Return Receipt Fee	
	Restricted Delivery	
	Total Postage & Fees	

US Postal Service
**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do Not Use for International Mail



AFFIX POSTAGE TO MAIL PIECE TO COVER FIRST CLASS POSTAGE, CERTIFIED FEE, RETURN RECEIPT FEE AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES.*

1. Detach the form 3811, Domestic return receipt by tearing left to right across perf. Attach to mailpiece by peeling back the adhesive strips and affixing to front of mailpiece if space permits. Otherwise affix to back of mailpiece.
2. If you do not want the receipt postmarked, stick the article # label to the right of the return address, date receipt and retain the receipt.
3. If you want this receipt postmarked, slip the 3800 receipt between the return receipt, and the mailpiece, and slide the edge of the receipt to the gummed edge of adhesive. This will hold the receipt in place to present to your mailcenter, or post office service window. (SEE ILLUSTRATION)

(Form 3800)

TO: P 981, 841 789

David D. Doe
Legal Segment Marketing Manager
Walz Postal Solutions, Inc.
1558 South Mission Rd. Suite 110
Fallbrook, CA 92028-4112

YOUR FIRM NAME
123 Main Street, #1254
City, State 12345

RETURN RECEIPT REQUESTED

David D. Doe
Legal Segment Marketing Manager
Walz Postal Solutions, Inc.
1558 South Mission Rd. Suite 110
Fallbrook, CA 92028-4112

4. Enter fees for the services requested in the appropriate spaces on the front of this receipt.
5. Save this receipt and present it if you make an inquiry.

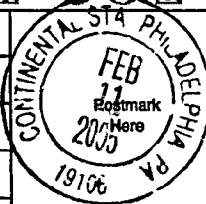
7004 2510 0003 3648 9570

CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	0.37
Certified Fee		Yes
Return Receipt Fee (Endorsement Required)		Yes
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	4.42



Sent To **AMQ-01663/18/05**
WORRELL JR., JOHN A.
Street, Apt. No.,
or PO Box No. **430 Pine Swamp Road**
City, State, ZIP+4 **Elverson, PA 19520**

PS Form 3800, June 2003

Certified Mail Provides:

PS Form 3800, June 2002 (Reverse)

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry. Internet access to delivery information is not available on mail addressed to APOs and FPOs.

Name and Address of Sender
GOLDBECK
SUITE 5000
701 MARKET STREET
PHILADELPHIA, PA
19106-1532

Check type of mail or service;

- ☐ Certified
☐ COD
☐ Delivery Confirmation
☐ Express Mail
☐ Insured
☐ Recorded Delivery (International)
☐ Registered
☐ Return Receipt for Merchandise
☐ Signature Confirmation

Affix Stamp Here
 (If issued as a
 certificate of mailing,
 or for additional copies
 of this bill)

Postmark and
 Date of Receipt

Article Number	Addressee (Name, Street, City, State, & ZIP Code)	Postage	Fee	Handling Charge	Actual Value if Registered	Insured Value	Due Sender if COD	DC Fee	SC Fee	SH Fee	RD Fee	RR Fee
1.	PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement Health and Welfare Bldg. - Room 432 P.O. Box 2675 Harrisburg, PA 17105-2675	TENANTS/OCCUPANTS 430 Pine Swamp Road Eiverson, PA 19520										
2.	DOMESTIC RELATIONS OF CHESTER COUNTY 117 West Gay Street PO Box 2748 West Chester, PA 19380											
3.	COMMONWEALTH OF PA. Dept of Revenue-Bureau of Commerce Dept 280946 Harrisburg, PA 17128-0946											
4.	COMMONWEALTH OF PA. Dept of Revenue Bureau of Accts Settlement P.O. Box 8901 Harrisburg, PA 17128-0946											
5.												
6.												
7.												
8.												



PA POST
 CONFIRMED
 NOV 20 2004
 HARRISBURG, PA

Total Number of Pieces Listed by Sender **5** Total Number of Pieces Received at Post Office

Postmaster, Per (Name of receiving employee)

See Privacy Act Statement on Reverse

PS Form 3877, February 2002 (Page 1 of 2)

AMQ-0166

JOHN A. WORRELL JR.

Complete by Typewriter, Ink, or Ball Point Pen

Name and Address of Sender
GOLDBECK
SUITE 5000
701 MARKET STREET
PHILADELPHIA, PA
19106-1532

Check type of mail or service:

- ☐ Certified
☐ COD
☐ Registered
☐ Delivery Confirmation
☐ Express Mail
☐ Insured
☐ Recorded Delivery (International)
☐ Return Receipt for Merchandise
☐ Signature Confirmation

Affix Stamp Here
(If issued as a
certificate of mailing,
or for additional copies
of this bill)
Postmark and
Date of Receipt

Addressee (Name, Street, City, State, & ZIP Code)

Pos

1. WORRELL, JOHN
430 PINA SWAMP RD.
ELMORSON, PA 19520

2.

3.

4.

5.

6.

7.

8.

Total Number of Pieces
Listed by Sender

Postmaster, Per (Name of receiving employee)

Total Number of Pieces
Received at Post Office

See Privacy Act Statement on Reverse

PS Form 3877, February 2002 (Page 1 of 2)

AMQ-0166

JOHN A. WORRELL JR.

Complete by Typewriter, Ink, or Ball Point Pen

-ORRELL-

UNITED STATES POSTAGE

PAID 430 PINA SWAMP RD.
ELMORSON, PA 19520
PAID FROM ZIP CODE



AMQ-0166

IN THE COURT OF COMMON PLEAS FOR CHESTER COUNTY PENNSYLVANIA
DEUTSCHE BANK NATIONAL TRUST CO. **JOHN A. WORRELL, JR.**
(Petitioner) Plaintiff VS. (Respondent) Defendant

CASE and/or DOCKET: 04-01994

I Declare that I am a Pennsylvania State Deputy Constable and/or Process Server, in and for the County of Montgomery, that I am not a party to this action, not an employee of a party to this action, or an attorney to the action, and that within the boundaries of the state where service was effected, I was authorized by law to perform the said service.

SERVICE

SERVICE UPON: **JOHN A. WORRELL, JR.**

Address: **430 PINE SWAMP ROAD, ELVERSON, PA 19520**

On: **2/16/05** At: **3:30 P.M.**

Description: Approximate Age: ___ Height: ___ Weight: ___ Race: ___ Sex: ___ Hair: ___

With the documents: **NOTICE OF SHERIFF'S SALE OF REAL PROPERTY**

MANNER OF SERVICE

By handing a copy to:

- ☐ 1.) Defendant(s) personally served
- ☐ 2.) Adult family member with whom said Defendant(s) reside.
Name: _____ Relationship: _____
- ☐ 3.) Adult in charge of defendants residence.
Name: _____ Relationship: _____
- ☒ 4.) Posted Property
- ☐ 5.) Agent or person in charge of Place of Business.
Name: _____ Title: _____

Comments:

Defendant was not served because:

___ Moved ___ Unknown ___ No Answer ___ Vacant ___ Other: _____

Service was attempted on the following dates and times:

1.) _____ 2.) _____ 3.) _____
Date: _____ Time: _____ Date: _____ Time: _____ Date: _____ Time: _____

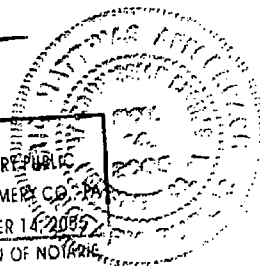
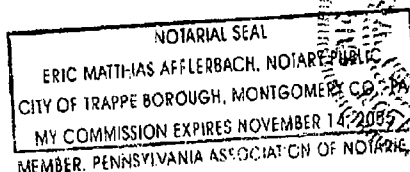
SERVER INFORMATION

UNIVERSAL LAWYERS' SERVICE
93 EAST MAIN ST.
BAY SHORE, NY 11706
631.666.6168


CONSTABLE / DEPUTY / PROCESS SERVER

Sworn to and subscribed
before me this 16 day
of February 2005


Notary Public



14625

GOLDBECK McCAFFERTY & McKEEVER

BY: Joseph A. Goldbeck, Jr.
Attorney I.D.#16132
Suite 5000 - Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532
215-627-1322
Attorney for Plaintiff

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE, OF AMERIQUEST MORTGAGE
SECURITIES, INC., ASSET-BACKED PASS THROUGH
CERTIFICATES, SERIES 2003-6, UNDER THE
POOLING AND SERVICING AGREEMENT DATED AS
OF MAY 1, 2003, WITHOUT RECOURSE
505 City Parkway West
Suite 100
Orange, CA 92868
Plaintiff

vs.

JOHN A. WORRELL JR.
**Mortgagor(s) and
Record Owner(s)**

430 Pine Swamp Road
Elverson, PA 19520

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Chester County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term
No. 04-01994

AFFIDAVIT PURSUANT TO RULE 3129

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, OF AMERIQUEST MORTGAGE SECURITIES, INC., ASSET-BACKED PASS THROUGH CERTIFICATES, SERIES 2003-6, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF MAY 1, 2003, WITHOUT RECOURSE, Plaintiff in the above action, by its attorney, Joseph A. Goldbeck, Jr., Esquire, sets forth as of the date the praecipe for the writ of execution was filed the following information concerning the real property located at:

430 Pine Swamp Road
Elverson, PA 19520

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

JOHN A. WORRELL JR.
430 Pine Swamp Road
Elverson, PA 19520

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

JOHN A. WORRELL JR.
430 Pine Swamp Road
Elverson, PA 19520

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

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement
Health and Welfare Bldg. - Room 432
P.O. Box 2675

Harrisburg, PA 17105-2675

DOMESTIC RELATIONS OF CHESTER COUNTY
117 West Gay Street
PO Box 2748
West Chester, PA 19380

COMMONWEALTH OF PA.
Dept of Revenue Bureau of Commerce
Dept 280946
Harrisburg, PA 17128-0946

COMMONWEALTH OF PA.
Dept of Revenue Bureau of Accts Settlement
P.O. Box 8901
Harrisburg, PA 17128-0946

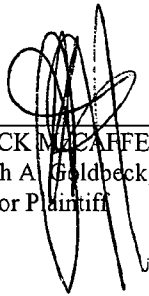
4. Name and address of the last recorded holder of every mortgage of record:
5. Name and address of every other person who has any record interest in or record lien on the property and whose interest may be affected by the sale:
6. Name and address of every other person of whom the plaintiff has knowledge who has any record interest in the property which may be affected by the sale.
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.

430 Pine Swamp Road
Elverson, PA 19520

(attach separate sheet if more space is needed)

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. Section 4904 relating to unsworn falsification to authorities.

DATED: November 11, 2004



GOLDBECK McCAFFERTY & McKEEVER
BY: Joseph A. Goldbeck, Jr., Esq.
Attorney for Plaintiff

FILED ^{6R} Atty pd. 20.00
m/10:11/10/1009 Notice to
MAY 09 2005 Defs.

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

McCABE, WEISBERG AND CONWAY, P.C.
BY: TERRENCE J. McCABE, ESQUIRE Attorney for Plaintiff
Identification Number 16496
123 South Broad Street, Suite 2080
Philadelphia, PA 19109
(215) 790-1010


Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania vs. Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett	CLEARFIELD COUNTY COURT OF COMMON PLEAS NUMBER: 04-1994-0
---	---

ASSESSMENT OF DAMAGES AND ENTRY OF JUDGMENT

TO THE PROTHONOTARY:

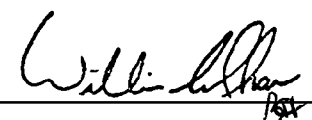
Kindly enter judgment by default in favor of Plaintiff and
against Defendant(s) in the above-captioned matter for failure to
answer Complaint as required by Pennsylvania Rules of Civil
Procedure and assess damages as follows:

Principal	\$56,303.33
Interest from 11/6/03-5/2/05	<u>\$ 2,943.51</u>
TOTAL	\$59,246.84


TERRENCE J. McCABE, ESQUIRE
Attorney for Plaintiff

AND NOW, this 9th day of May, 2005,
Judgment is entered in favor of Plaintiff, Beneficial Consumer
Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania and
against Defendant(s), Linda L. Plunkett a/k/a Linda L. Dowd and Roy
A. Plunkett and damages are assessed in the amount of \$59,246.84,
plus interest and costs.

BY THE PROTHONOTARY:


William A. Shaw

McCABE, WEISBERG AND CONWAY, P.C.
BY: TERRENCE J. McCABE, ESQUIRE
Identification Number 16496
123 South Broad Street, Suite 2080
Philadelphia, PA 19109
(215) 790-1010

Attorney for Plaintiff

Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania vs. Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett	CLEARFIELD COUNTY COURT OF COMMON PLEAS NUMBER: 04-1994-0
---	---

AFFIDAVIT OF NON-MILITARY SERVICE

COMMONWEALTH OF PENNSYLVANIA:

SS.

COUNTY OF CLEARFIELD:

The undersigned, being duly sworn according to law, deposes and says that the Defendant(s) is 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; and that the Defendant(s), is/are over eighteen (18) years of age and resides at resides at the respective addresses:


Linda L. Plunkett a/k/a Linda L. Dowd
278 Atlantic Avenue
Houtzdale, PA 16651

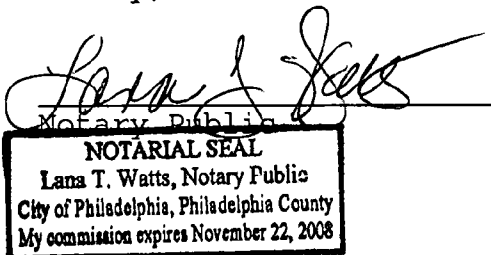
Roy A. Plunkett
278 Atlantic Avenue
Houtzdale, PA 16651

SWORN TO AND SUBSCRIBED

BEFORE ME THIS 2nd DAY

OF May, 2005.


TERRENCE J. McCABE, ESQUIRE
Attorney for Plaintiff



McCABE, WEISBERG AND CONWAY, P.C.

BY: TERRENCE J. McCABE, ESQUIRE

Attorney for Plaintiff

Identification Number 16496

123 South Broad Street, Suite 2080

Philadelphia, PA 19109

(215) 790-1010

Beneficial Consumer Discount
Company d/b/a Beneficial
Mortgage Co. of Pennsylvania
vs.
Linda L. Plunkett a/k/a Linda
L. Dowd and Roy A. Plunkett

CLEARFIELD COUNTY
COURT OF COMMON PLEAS

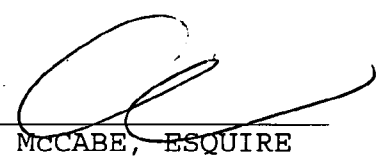
NUMBER: 04-1994-0


CERTIFICATION

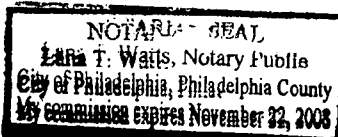
Terrence J. McCabe, attorney for Plaintiff, being duly sworn according to law, deposes and says that he deposited in the United States Mail a letter notifying the Defendant(s) that judgment would be entered against him/her within ten (10) days from the date of said letter in accordance with Rule 237.5 of the Pennsylvania Rules of Civil Procedure. A copy of said letter is attached hereto and marked as Exhibit "A".

SWORN TO AND SUBSCRIBED
BEFORE ME THIS 2nd DAY

OF May, 2005.


TERRENCE J. McCABE, ESQUIRE
Attorney for Plaintiff


Notary Public



VERIFICATION

The undersigned, TERRENCE J. McCABE, ESQUIRE, hereby certifies that he is the attorney for the Plaintiff in the within action and that he is authorized to make this verification and that the foregoing facts are true and correct to the best of his knowledge, information and belief and further states that false statements herein are made subject to the penalties of 18 PA.C.S. Section 4909 relating to unsworn falsification to authorities.



TERRENCE J. McCABE, ESQUIRE

**OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS
Clearfield County Courthouse, Clearfield, PA 16830**

**William A. Shaw
Prothonotary**

March 7, 2005

To: Roy A. Plunkett
278 Atlantic Avenue
Houtzdale, PA 16651

Beneficial Consumer Discount Company
d/b/a Beneficial Mortgage Co. of
Pennsylvania

Clearfield County
Court of Common Pleas

vs.
Linda L. Plunkett a/k/a Linda L. Dowd
and
Roy A. Plunkett

Number 04-1994-0

**NOTICE, RULE 237.5
NOTICE OF PRAECIPE TO ENTER JUDGMENT BY DEFAULT**

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 PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Dave Meholic
Court Administrator
Clearfield County Courthouse
230 East Market Street
Clearfield, PA, 16830
814-765-2641 x 5982

NOTIFICACION IMPORTANTE

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER PRESENTADO UNA COMPARECENCIA ESCRITA, YA SEA PERSONALMENTE O POR ABOGADO Y POR NO HABER RADICADO POR ESCRITO CON ESTE TRIBUNAL SUS DEFENSAS U OBJECIONES A LOS RECLAMOS FORMULADOS EN CONTRA SUYO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE DIEZ (10) DIAS DE LA FECHA DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARECER USTED EN CORTE U OIR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA Y USTED PODRIA PERDER BIENES U OTROS DERECHOS IMPORTANTES.

USTED LE DEBE TOMAR ESTE PAPEL A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE A UN ABOGADO, VA A O TELEFONEA LA OFICINA EXPUSO ABAJO. ESTA OFICINA LO PUEDE PROPORCIONAR CON INFORMACION ACERCA DE EMPLEAR A UN ABOGADO.

SI USTED NO PUEDE PROPORCIONAR PARA EMPLEAR UN ABOGADO, ESTA OFICINA PUEDE SER CAPAZ DE PROPORCIONARLO CON INFORMACION ACERCA DE LAS AGENCIAS QUE PUEDEN OFRECER LOS SERVICIOS LEGALES A PERSONAS ELEGIBLES EN UN HONORARIO REDUCIDO NI NINGUN HONORARIO.

Dave Meholic
Court Administrator
Clearfield County Courthouse
230 East Market Street
Clearfield, PA, 16830
814-765-2641 x 5982

Exhibit A

**Terrence J. McCabe, Esquire
Attorney for Plaintiff
McCABE, WEISBERG & CONWAY, P.C.
123 South Broad Street, Suite 2080
Philadelphia, Pennsylvania 19109**

TJM/cmo

**OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS
Clearfield County Courthouse, Clearfield, PA 16830**

**William A. Shaw
Prothonotary**

March 7, 2005

To: Linda L. Plunkett a/k/a Linda L. Dowd
278 Atlantic Avenue
Houtzdale, PA 16651

Beneficial Consumer Discount Company
d/b/a Beneficial Mortgage Co. of
Pennsylvania

vs.

Linda L. Plunkett a/k/a Linda L. Dowd
and
Roy A. Plunkett

Clearfield County
Court of Common Pleas

Number 04-1994-0

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NOTICE OF PRAECIPE TO ENTER JUDGMENT BY DEFAULT**

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Dave Meholic
Court Administrator
Clearfield County Courthouse
230 East Market Street
Clearfield, PA, 16830
814-765-2641 x 5982

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USTED LE DEBE TOMAR ESTE PAPEL A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE A UN ABOGADO, VA A O TELEFONEA LA OFICINA EXPUSO ABAJO. ESTA OFICINA LO PUEDE PROPORCIONAR CON INFORMACION ACERCA DE EMPLEAR A UN ABOGADO.

SI USTED NO PUEDE PROPORCIONAR PARA EMPLEAR UN ABOGADO, ESTA OFICINA PUEDE SER CAPAZ DE PROPORCIONARLO CON INFORMACION ACERCA DE LAS AGENCIAS QUE PUEDEN OFRECER LOS SERVICIOS LEGALES A PERSONAS ELEGIBLES EN UN HONORARIO REDUCIDO NI NINGUN HONORARIO.

Dave Meholic
Court Administrator
Clearfield County Courthouse
230 East Market Street
Clearfield, PA, 16830
814-765-2641 x 5982

Exhibit A

**Terrence J. McCabe, Esquire
Attorney for Plaintiff
McCABE, WEISBERG & CONWAY, P.C.
123 South Broad Street, Suite 2080
Philadelphia, Pennsylvania 19109**

TJM/cmo

COPY

OFFICE OF THE PROTHONOTARY

COURT OF COMMON PLEAS

Clearfield County Courthouse, Clearfield, PA 16830

William A. Shaw
Prothonotary

To: Linda L. Plunkett a/k/a Linda L. Dowd
278 Atlantic Avenue
Houtzdale, PA 16651

Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania vs. Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett	CLEARFIELD COUNTY COURT OF COMMON PLEAS NUMBER: 04-1994-0
---	---

NOTICE

Pursuant to Rule 236, you are hereby notified that a JUDGMENT
has been entered in the above proceeding as indicated below.

William A. Shaw 5/9/05
Prothonotary

 X Judgment by Default
 Money Judgment
 Judgment in Replevin
 Judgment for Possession

If you have any questions concerning this Judgment, please call
Terrence J. McCabe, Esquire at (215) 790-1010.

COPY

OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS

Clearfield County Courthouse, Clearfield, PA 16830

William A. Shaw
Prothonotary

To: Roy A. Plunkett
278 Atlantic Avenue
Houtzdale, PA 16651

Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania vs. Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett	CLEARFIELD COUNTY COURT OF COMMON PLEAS NUMBER: 04-1994-0
---	---

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William A. Shaw *5/9/05*
Prothonotary

 X Judgment by Default
 Money Judgment
 Judgment in Replevin
 Judgment for Possession

If you have any questions concerning this Judgment, please call
Terrence J. McCabe, Esquire at (215) 790-1010.

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

Beneficial Consumer Discount
Plaintiff(s)

No.: 2004-01994-CD

Real Debt: \$59,246.84

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Linda L. Plunkett
Roy A. Plunkett
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: May 9, 2005

Expires: May 9, 2010

Certified from the record this 9th day of May, 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

Praecipe for Writ of Execution-MORTGAGE FORECLOSURE

Beneficial Consumer Discount
Company d/b/a Beneficial
Mortgage Co. of Pennsylvania

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

VS.

04-1994-0

Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett NO. _____ TERM

PRAECIPE FOR WRIT OF EXECUTION

To the Prothonotary:

Issue Writ of Execution in the above matter;

1. Directed to the Sheriff of CLEARFIELD COUNTY.
2. Against the following property Linda L. Plunkett a/k/a Linda L. Dowd Of defendant(s) and
3. Against the following property in the hands of (name) Linda L. Plunkett a/k/a Linda L. Dowd
4. And index this writ;
 - (a) against Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett Defendant(s) and
 - (b) against _____ as GarnisheeAs a lis pendens against real property of the defendant(s) in name of garnishee as follows, _____


(Specifically described property)

(If space insufficient, attach extra sheets)

FILED 1008/6
M 110:1660 Writs w/
MAY 09 2005 prop. descr.
to Sheriff
William A. Shaw
Prothonotary/Clerk of Courts
Atty pd 20.00

5. Amount Due \$ 59,246.84
Interest from 5/3/05 - date of sale \$ _____
Costs (to be added) \$ _____

Prothonotary costs 125.00


TERRENCE J. MCCABE, ESQUIRE
Attorney for Plaintiff(s)

04-1994-0
NO. _____ TERM _____

NO. _____ TERM _____

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY
PENNSYLVANIA

Beneficial Consumer Discount
Company d/b/a Beneficial
Mortgage Co. of Pennsylvania

VS.

Linda L. Plunkett a/k/a Linda
L. Dowd and Roy A. Plunkett

Praeipe for Writ of
Execution

Prothonotary/Clerk of Courts
William A. Shaw

MAY 09 2005

FILED

TERRENCE J. MCCABE, ESQUIRE
Attorney I.D. No 16496
123 S. Broad Street, Ste. 2080
Philadelphia, PA 19109
Tel: 215 790 1010

RECEIVED WRIT THIS _____ DAY _____

OF _____ A.D. _____

AT _____ M _____

Sheriff

(MORTGAGE FORECLOSURE)

EXECUTION DEBT 59,246.84

INTEREST FROM
5/3/05

PROTHONOTARY 125.00

USE ATTORNEY

USE PLAINTIFF

ATTORNEY'S COMM.

SATISFACTION

SHERIFF

Attorney for Plaintiff(s)

LEGAL DESCRIPTION

ALL THAT CERTAIN piece or parcel of ground situate, lying and being in the Township of Bigler, County of Clearfield and Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at an iron pipe, situate on the Southern side of LR 17047, and the Northwestern corner of land of Grantors; thence North Forty-three degrees Thirty-eight minutes East (N 43° 38' E) Two Hundred Seventy-two and Thirty Hundredths (272.30') feet along the Southern side of LR 17047 to an iron pipe; thence South Twenty-nine degrees Forty-six minutes East (S 29° 46' E) Four Hundred Ninety-two and Forty hundredths (492.40') feet to an iron pipe; thence South Sixty-six degrees One minutes West (S 66° 01' W) Two Hundred Sixty and Sixty-five hundredths (260.65') feet to an iron pipe; thence North Thirty degrees Zero minutes West (N 30° 00' W) Three Hundred Eighty-eight and Twenty-five hundredths (388.25') feet to iron pipe, and place of beginning. CONTAINING 2.63 acres. HAVING erected thereon a garage.

RESERVING all the coal and other minerals and mining rights as set forth in prior deeds in chain of title to said premises.

Being Parcel No. 103-L13-36

RECORD OWNER

TITLE TO SAID PREMISES IS VESTED IN: BEING the same premises, which Walter Bungo and Jacqueline E. Bungo, his wife, by Deed dated September 19, 1986, and recorded September 26, 1986, in Deed Book 1111, Page 402, granted and conveyed unto Linda L. Dowd, in fee.

Being Known As: RD#1, Box 354, Houtzdale, PA 16651.

McCABE, WEISBERG AND CONWAY, P.C.

BY: TERRENCE J. McCABE, ESQUIRE

Attorney for Plaintiff

Identification Number 16496

123 South Broad Street, Suite 2080

Philadelphia, PA 19109

(215) 790-1010

Beneficial Consumer Discount
Company d/b/a Beneficial
Mortgage Co. of Pennsylvania
vs.
Linda L. Plunkett a/k/a Linda
L. Dowd and Roy A. Plunkett

CLEARFIELD COUNTY
COURT OF COMMON PLEAS

NUMBER: 04-1994-0

AFFIDAVIT PURSUANT TO RULE 3129

I, Terrence J. McCabe, Esquire, attorney for Plaintiff in the above action, set forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at , a copy of the description of said property is attached hereto and marked Exhibit "A."

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

Name

Address

Linda L. Plunkett a/k/a

Linda L. Dowd

278 Atlantic Avenue
Houtzdale, PA 16651

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

Name

Address

Linda L. Plunkett a/k/a

Linda L. Dowd

278 Atlantic Avenue

Roy A. Plunkett

278 Atlantic Avenue
Houtzdale, PA 16651

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

Name

Address

NONE

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

Name	Address
Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania	P.O. Box 8621 Elmhurst, IL 60126 ATTN: Al Spears
Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania	1067 Pennsylvania Ave. Tyrone, PA 16686

5. Name and address of every other person who has any record interest in or record lien on the property and whose interest may be affected by the sale:

Name	Address
United States of America c/o Attorney for the Western District of PA	633 U.S. Post Office and Courthouse 7 th & Grant Streets Pittsburgh, PA 15219
Commonwealth of Pennsylvania Inheritance Tax Office	1400 Spring Garden Street Philadelphia, PA 19130
Internal Revenue Service Federated Investors Tower	13 th Floor, Suite 1300 1001 Liberty Avenue Pittsburgh, PA 15222
Commonwealth of PA Bureau of Individual Tax Inheritance Tax Division	6th flr., Strawberry Sq. Dept. #280601 Harrisburg, PA 17128

6. Name and address of every other person of whom the Plaintiff has knowledge who has any interest in the property which may be affected by the sale:

Name	Address
Tenant/Occupant(s)	RD#1, Box 354 Houtzdale, PA 16651

Domestic Relations

Clearfield County
230 E. Market
Suite 300
Clearfield, PA 16830


Commonwealth of Pennsylvania,

Department of Welfare,
P.O. Box 2675,
Harrisburg, PA 17105.

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. Section 4904 relating to unsworn falsification to authorities.

May 2, 2005

DATE



TERRENCE J. McCABE, ESQUIRE
Attorney for Plaintiff

LEGAL DESCRIPTION

ALL THAT CERTAIN piece or parcel of ground situate, lying and being in the Township of Bigler, County of Clearfield and Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at an iron pipe, situate on the Southern side of LR 17047, and the Northwestern corner of land of Grantors; thence North Forty-three degrees Thirty-eight minutes East (N 43° 38' E) Two Hundred Seventy-two and Thirty Hundredths (272.30') feet along the Southern side of LR 17047 to an iron pipe; thence South Twenty-nine degrees Forty-six minutes East (S 29° 46' E) Four Hundred Ninety-two and Forty hundredths (492.40') feet to an iron pipe; thence South Sixty-six degrees One minutes West (S 66° 01' W) Two Hundred Sixty and Sixty-five hundredths (260.65') feet to an iron pipe; thence North Thirty degrees Zero minutes West (N 30° 00' W) Three Hundred Eighty-eight and Twenty-five hundredths (388.25') feet to iron pipe, and place of beginning. CONTAINING 2.63 acres. HAVING erected thereon a garage.

RESERVING all the coal and other minerals and mining rights as set forth in prior deeds in chain of title to said premises.

Being Parcel No. 103-L13-36

RECORD OWNER

TITLE TO SAID PREMISES IS VESTED IN: BEING the same premises, which Walter Bungo and Jacqueline E. Bungo, his wife, by Deed dated September 19, 1986, and recorded September 26, 1986, in Deed Book 1111, Page 402, granted and conveyed unto Linda L. Dowd, in fee.

Being Known As: RD#1, Box 354, Houtzdale, PA 16651.

**WRIT OF EXECUTION and/or ATTACHMENT
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
CIVIL ACTION - LAW**

Beneficial Consumer Discount d/b/a
Beneficial Mortgage Co. of Pennsylvania

Vs.

NO.: 2004-01994-CD

Linda L. Plunkett a/k/a Linda L. Dowd and
Roy A. Plunkett

Copy

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the debt, interest and costs due BENEFICIAL CONSUMER DISCOUNT COMPANY d/b/a Beneficial Mortgage Co. of Pennsylvania, Plaintiff(s) from LINDA L. PLUNKETT a/k/a Linda L. Dowd and ROY A. PLUNKETT, Defendant(s):

(1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:
See Attached Description

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:

Garnishee(s) as follows:

and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;

(3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE: \$59,246.84
INTEREST from 5/3/05-date of sale
PROTH. COSTS: \$
ATTY'S COMM: \$
DATE: 05/09/2005

PAID: \$125.00
SHERIFF: \$
OTHER COSTS: \$

William A. Shaw
Prothonotary/Clerk Civil Division

Received this writ this _____ day
of _____ A.D. _____
At _____ A.M./P.M.

Requesting Party: Terrence J. McCabe, Esq.
123 S. Broad St., Ste. 2080
Philadelphia, PA 19109
(215) 790-1010

Sheriff

LEGAL DESCRIPTION

ALL THAT CERTAIN piece or parcel of ground situate, lying and being in the Township of Bigler, County of Clearfield and Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at an iron pipe, situate on the Southern side of LR 17047, and the Northwestern corner of land of Grantors; thence North Forty-three degrees Thirty-eight minutes East (N 43° 38' E) Two Hundred Seventy-two and Thirty Hundredths (272.30') feet along the Southern side of LR 17047 to an iron pipe; thence South Twenty-nine degrees Forty-six minutes East (S 29° 46' E) Four Hundred Ninety-two and Forty hundredths (492.40') feet to an iron pipe; thence South Sixty-six degrees One minutes West (S 66° 01' W) Two Hundred Sixty and Sixty-five hundredths (260.65') feet to an iron pipe; thence North Thirty degrees Zero minutes West (N 30° 00' W) Three Hundred Eighty-eight and Twenty-five hundredths (388.25') feet to iron pipe, and place of beginning. CONTAINING 2.63 acres. HAVING erected thereon a garage.

RESERVING all the coal and other minerals and mining rights as set forth in prior deeds in chain of title to said premises.

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Being Known As: RD#1, Box 354, Houtzdale, PA 16651.

McCABE, WEISBERG AND CONWAY, P.C.

BY: TERRENCE J. McCABE, ESQUIRE
Identification Number 16496
123 South Broad Street, Suite 2080
Philadelphia, PA 19109
(215) 790-1010

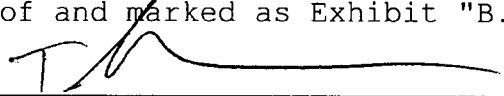
Attorney for Plaintiff

Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania vs. Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett	CLEARFIELD COUNTY COURT OF COMMON PLEAS NUMBER: 04-1994-0
---	---

AFFIDAVIT OF SERVICE

I, Terrence J. McCabe, Esquire, attorney for the Plaintiff in the within matter, hereby certify that on the 25th day of August, 2005, a true and correct copy of the Notice of Sheriff's Sale of Real Property was served on all pertinent lienholder(s) as set forth in the Affidavit Pursuant to 3129 which is attached hereto as Exhibit "A".

Copies of the letter and certificate of mailing are also attached hereto, made a part hereof and marked as Exhibit "B."


TERRENCE J. McCABE, ESQUIRE

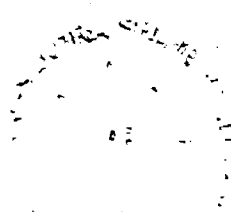
SWORN TO AND SUBSCRIBED
BEFORE ME THIS 25th DAY
OF August, 2005.


NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

Chrissandra Shaye Hamilton, Notary Public
City of Philadelphia, Phila. County
My Commission Expires January 4, 2009

FILED ^{NO} _{CC}
SEP 01 2005


William A. Shaw
Prothonotary/Clerk of Courts

McCABE, WEISBERG AND CONWAY, P.C.
BY: TERRENCE J. McCABE, ESQUIRE
Identification Number 16496
123 South Broad Street, Suite 2080
Philadelphia, PA 19109
(215) 790-1010

Attorney for Plaintiff

Exhibit A

Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania vs. Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett	CLEARFIELD COUNTY COURT OF COMMON PLEAS NUMBER: 04-1994-0
---	---

AFFIDAVIT PURSUANT TO RULE 3129

I, Terrence J. McCabe, Esquire, attorney for Plaintiff in the above action, set forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at , a copy of the description of said property is attached hereto and marked Exhibit "A."

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

Name	Address
Linda L. Plunkett a/k/a Linda L. Dowd	278 Atlantic Avenue Houtzdale, PA 16651

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

Name	Address
Linda L. Plunkett a/k/a Linda L. Dowd	278 Atlantic Avenue
Roy A. Plunkett	278 Atlantic Avenue Houtzdale, PA 16651

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

Name	Address
NONE	

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

Name

Address

Exhibit A

Beneficial Consumer
Discount Company d/b/a
Beneficial Mortgage Co.
of Pennsylvania

P.O. Box 8621
Elmhurst, IL 60126
ATTN: Al Spears

Beneficial Consumer
Discount Company d/b/a
Beneficial Mortgage Co.
of Pennsylvania

1067 Pennsylvania Ave.
Tyrone, PA 16686

5. Name and address of every other person who has any record interest in or record lien on the property and whose interest may be affected by the sale:

Name

Address

United States of America
c/o Attorney for the Western
District of PA

633 U.S. Post Office and Courthouse
7th & Grant Streets
Pittsburgh, PA 15219

Commonwealth of Pennsylvania

Inheritance Tax Office 1400 Spring Garden Street
Philadelphia, PA 19130

Internal Revenue Service
Federated Investors Tower

13th Floor, Suite 1300
1001 Liberty Avenue
Pittsburgh, PA 15222

Commonwealth of PA
Bureau of Individual Tax
Inheritance Tax Division

6th flr., Strawberry Sq.
Dept. #280601
Harrisburg, PA 17128

6. Name and address of every other person of whom the Plaintiff has knowledge who has any interest in the property which may be affected by the sale:

Name

Address

Tenant/Occupant(s)

RD#1, Box 354
Houtzdale, PA 16651

Domestic Relations

Clearfield County
230 E. Market
Suite 300
Clearfield, PA 16830

Commonwealth of Pennsylvania,

Department of Welfare,
P.O. Box 2675,
Harrisburg, PA 17105


Department of Public Welfare

TPL Casualty Unit Estate
Recovery Program
Willow Oak Building
P.O. Box 8486
Harrisburg, PA 17105-8486

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. Section 4904 relating to unsworn falsification to authorities.

August 25, 2005

DATE



TERRENCE J. McCABE, ESQUIRE
Attorney for Plaintiff

Exhibit A

McCABE, WEISBERG AND CONWAY, P.C.

BY: TERRENCE J. McCABE, ESQUIRE
Identification Number 16496
123 South Broad Street, Suite 2080
Philadelphia, Pennsylvania 19109
(215) 790-1010

Attorney for Plaintiff

Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania vs. Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett	CLEARFIELD COUNTY COURT OF COMMON PLEAS NUMBER: 04-1994-0
---	---

DATE: August 25, 2005

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

Exhibit B

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

OWNERS: Linda L. Plunkett a/k/a Linda L. Dowd

PROPERTY: RD#1, Box 354, Houtzdale, PA 16651
(tax parcel#103-L13-36)

IMPROVEMENTS: Residential Dwelling

The above-captioned property is scheduled to be sold at the Sheriff's Sale on October 7, 2005 at 10:00 a.m. in the Sheriff's Office of the Clearfield County Courthouse, 1 North Second Street, Clearfield, Pennsylvania 16830. Our records indicate that you may hold a mortgage or judgments and liens on, and/or other interests in the property which will be extinguished by the sale. You may wish to attend the sale to protect your interests.

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

Check type of mail or service:

☐ Certified ☐ Registered ☐ Recorded Delivery (International)

☐ COD ☐ Return Receipt for Merchandise

☐ Delivery Confirmation ☐ Signature Confirmation

☐ Express Mail ☐ Insured

Line	Article Number	Addressee Name, Street and PO Address	Postage
1	Beneficial v. Plunkett	Linda L. Plunkett a/k/a Linda L. Dowd 278 Atlantic Avenue Houtzdale, PA 16651	
2		Roy A. Plunkett 278 Atlantic Avenue Houtzdale, PA 16651	
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
Total Number of Pieces Listed by Sender		Postmaster, Per (Name of receiving employee)	
2			

Complete by Typewriter, Ink, or Ball Point Pen

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of irreparable documents under Express Mail document reconstruction insurance is \$500 per piece subject to overall limitations (or multiple pieces not to damage a single document). The maximum indemnity payable on Express Mail merchandise insurance is \$500, but optional Express Mail Service merchandise is available for up to \$5,000 in value, but only if the maximum indemnity payable is \$25,000 per registered mail. See *Domestic Mail Manual* 9590, 9591, and 9391 for limitations of coverage on insured and COD mail. See *International Mail Manual* for limitations of coverage on international mail. Special handling charges apply only on Standard Mail (1B) services.



02 1A
0004600908
MAILED FROM ZIP CODE 19109

Exhibit B

Name and Address of Sender
McCabe, Weisberg and Conway, P.C.
123 S. Broad St., Suite 2080
Philadelphia, PA 19109
ATTN: Samantha Young

Check type of mail or service:
☐ Certified
☐ COD
☐ Registered
☐ Return Receipt for Merchandise
☐ Signature Confirmation
☐ Express Mail
☐ Insured

Affix
(if issue
certific
or for i
copies
Post/
Date

Line	Article Number	Address Name, Street and PO Address	Postage	F
1	Beneficial v. Plunkett	Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania P.O. Box 8621 Elmhurst, IL 60126 ATTN: Al Spears		
2		Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania 1067 Pennsylvania Ave. Tyrone, PA 16686		
3		United States of America c/o Attorney for the Western District of PA 633 U.S. Post Office and Courthouse 7th & Grant Streets Pittsburgh, PA 15219		
4		Commonwealth of Pennsylvania Inheritance Tax Office 1400 Spring Garden Street Philadelphia, PA 19130		
5		Internal Revenue Service Federated Investors Tower 13th Floor, Suite 1300 1001 Liberty Avenue Pittsburgh, PA 15222		
6		Commonwealth of PA Bureau of Individual Tax Inheritance Tax Division 6th flr., Strawberry Sq. Dept. #280601 Harrisburg, PA 17128		
7		Tenant/Occupant(s) RD#1, Box 354 Houtzdale, PA 16651		
8		Domestic Relations Clearfield County 230 E. Market Suite 300 Clearfield, PA 16830		
9		Commonwealth of Pennsylvania, Department of Welfare P.O. Box 2675 Harrisburg, PA 17105		

UNITED STATES POSTAGE
02 1A
\$ 03.000
0004600908
AUG 25 2005
MAILED FROM ZIP CODE 19109

AUG 25 2005

Exhibit B

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20146

NO: 04-1994-CD

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE CO. OF PENNSYLVANIA

vs.

DEFENDANT: LINDA L. PLUNKETT A/K/A LINDA L. DOWD AND ROY A. PLUNKETT

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 05/09/2005

LEVY TAKEN 07/01/2005 @ 10:35 AM

POSTED 07/01/2005 @ 10:34 AM

SALE HELD 10/07/2005

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 02/13/2006

DATE DEED FILED **NOT SOLD**

FILED
018:5261
FEB 14 2006

William A. Shaw
Prothonotary/Clerk of Courts

DETAILS

07/01/2005 @ 10:34 AM SERVED LINDA L. PLUNKETT A/K/A LINDA L. DOWD

SERVED LINDA L. PLUNKETT A/K/A LINDA L. DOWD, DEFENDANT, AT HER RESIDENCE RD #1, BOX 354 A/K/A 278 ATLANTIC AVENUE, HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ROY PLUNKETT, HUSBAND/DEFENDANT

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

07/01/2005 @ 10:34 AM SERVED ROY A. PLUNKETT

SERVED ROY A. PLUNKETT, DEFENDANT, AT HIS RESIDENCE RD #1, BOX 354 A/K/A 278 ATLANTIC AVENUE, HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ROY PLUNKETT

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, AUGUST 24, 2005 RECEIVED A FAX FROM THE PLAINTIFF'S ATTORNEY TO CONTINUE THE SHERIFF SALE SCHEDULED FOR SEPTEMBER 2, 2005 50 OCTOBER 7, 2005.

@ SERVED

NOW, OCTOBER 18, 2005 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY INFORMING OUR OFFICE THAT THE DEFENDANTS FILED BANKRUPTCY ON OCTOBER 6, 2006 MAKING THE SHERIFF'S SALE INVALID.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20146
NO: 04-1994-CD

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE CO. OF
PENNSYLVANIA

vs.

DEFENDANT: LINDA L. PLUNKETT A/K/A LINDA L. DOWD AND ROY A. PLUNKETT


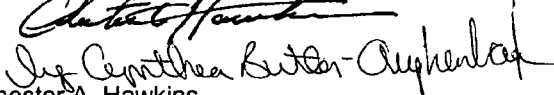
Execution REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS \$219.71

SURCHARGE \$40.00 PAID BY ATTORNEY

So Answers,



Chester A. Hawkins
Sheriff

**WRIT OF EXECUTION and/or ATTACHMENT
COMMONWEALTH OF PENNSYLVANIA, COUNTY OF CLEARFIELD
CIVIL ACTION - LAW**

Beneficial Consumer Discount d/b/a
Beneficial Mortgage Co. of Pennsylvania

Vs.

NO.: 2004-01994-CD

Linda L. Plunkett a/k/a Linda L. Dowd and
Roy A. Plunkett

TO THE SHERIFF OF CLEARFIELD COUNTY:

To satisfy the debt, interest and costs due BENEFICIAL CONSUMER DISCOUNT COMPANY d/b/a Beneficial Mortgage Co. of Pennsylvania, Plaintiff(s) from LINDA L. PLUNKETT a/k/a Linda L. Dowd and ROY A. PLUNKETT, Defendant(s):

(1) You are directed to levy upon the property of the defendant(s) and to sell interest(s) therein:
See Attached Description

(2) You are also directed to attach the property of the defendant(s) not levied upon in the possession of:

Garnishee(s) as follows:

and to notify the garnishee(s) that: (a) an attachment has been issued; (b) the garnishee(s) is/are enjoined from paying any debt to or for the account of the defendant(s) and from delivering any property of the defendant(s) or otherwise disposing thereof;

(3) If property of the defendant(s) not levied upon and subject to attachment is found in the possession of anyone other than a named garnishee, you are directed to notify him/her that he/she has been added as a garnishee and is enjoined as above stated.

AMOUNT DUE: \$59,246.84
INTEREST from 5/3/05-date of sale
PROTH. COSTS: \$
ATTY'S COMM: \$
DATE: 05/09/2005

PAID: \$125.00
SHERIFF: \$
OTHER COSTS: \$



William A. Shaw
Prothonotary/Clerk Civil Division

Received this writ this 9th day
of May A.D. 2005
At 2:15 A.M. (P.M.)

Charles A. Haverkins
Sheriff By Cynthia Butler Deeghenbaugh

Requesting Party: Terrence J. McCabe, Esq.
123 S. Broad St., Ste. 2080
Philadelphia, PA 19109
(215) 790-1010

LEGAL DESCRIPTION

ALL THAT CERTAIN piece or parcel of ground situate, lying and being in the Township of Bigler, County of Clearfield and Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at an iron pipe, situate on the Southern side of LR 17047, and the Northwestern corner of land of Grantors; thence North Forty-three degrees Thirty-eight minutes East (N 43° 38' E) Two Hundred Seventy-two and Thirty Hundredths (272.30') feet along the Southern side of LR 17047 to an iron pipe; thence South Twenty-nine degrees Forty-six minutes East (S 29° 46' E) Four Hundred Ninety-two and Forty hundredths (492.40') feet to an iron pipe; thence South Sixty-six degrees One minutes West (S 66° 01' W) Two Hundred Sixty and Sixty-five hundredths (260.65') feet to an iron pipe; thence North Thirty degrees Zero minutes West (N 30° 00' W) Three Hundred Eighty-eight and Twenty-five hundredths (388.25') feet to iron pipe, and place of beginning. CONTAINING 2.63 acres. HAVING erected thereon a garage.

RESERVING all the coal and other minerals and mining rights as set forth in prior deeds in chain of title to said premises.

Being Parcel No. 103-L13-36

RECORD OWNER

TITLE TO SAID PREMISES IS VESTED IN: BEING the same premises, which Walter Bungo and Jacqueline E. Bungo, his wife, by Deed dated September 19, 1986, and recorded September 26, 1986, in Deed Book 1111, Page 402, granted and conveyed unto Linda L. Dowd, in fee.

Being Known As: RD#1, Box 354, Houtzdale, PA 16651.

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME LINDA L. PLUNKETT A/K/A LINDA L. DOWD

NO. 04-1994-CD

NOW, February 11, 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 October 07, 2005, I exposed the within described real estate of Linda L. Plunkett A/K/A Linda L. Dowd And Roy A. Plunkett 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	14.58
LEVY	15.00
MILEAGE	14.58
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	5.55
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	
ADD'L POSTING	
ADD'L MILEAGE	
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	\$219.71

DEED COSTS:

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

PLAINTIFF COSTS, DEBT AND INTEREST:

DEBT-AMOUNT DUE	59,246.84
INTEREST @	0.00
FROM TO 10/07/2005	
PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	40.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	
TOTAL DEBT AND INTEREST	\$59,286.84

COSTS:

ADVERTISING	374.56
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	
DEED COSTS	0.00
SHERIFF COSTS	219.71
LEGAL JOURNAL COSTS	180.00
PROTHONOTARY	125.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
TOTAL COSTS	\$1,039.27

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

LAW OFFICES:
McCABE, WEISBERG & CONWAY, P.C.

TERRENCE J. McCABE***
MARC S. WEISBERG**
EDWARD D. CONWAY
MARGARET GAIRO
RITA C. BUSCHER*†
MONICA G. CHRISTIE*†
FRANK DUBIN
BRENDA L. BROGDON*
SEAN GARRETT**+
BETH L. THOMAS
LAURENCE R. CHASHIN*
SVEN E. PFAHLERT*
JOSEPH VACCARO*
MICHELE DELILLE^
CATANIA TRIGO^

SUITE 2080
123 SOUTH BROAD STREET
PHILADELPHIA, PA 19109
(215) 790-1010
FAX (215) 790-1274

SUITE 600
216 HADDON AVENUE
WESTMONT, NJ 08108
(856) 858-7080
FAX (856) 858-7020

SUITE 205
53 WEST 36TH STREET
NEW YORK, NY 10018
(917) 351-1188
FAX (917) 351-0363

JOSEPH F. RIGA*
Of Counsel

* Licensed in PA & NJ
** Licensed in PA & NY
*** Licensed in PA & NM
**** Licensed in PA, NJ & NY
† Licensed in NY & CT
^ Licensed in NY
‡ Managing Attorney for NJ
+ Managing Attorney for NY

August 24, 2005

Via Facsimile

Sheriff of Clearfield County
1 North 2nd Street
Suite 116
Clearfield, PA 16830

Re: ***Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Company
of Pennsylvania vs. Linda L. Plunkett a/k/a Linda L. Dowd and Roy A.
Plunkett
C.C.P. Clearfield County, No. 04-1994-0
Premises: RD 1 Box 354, Houtzdale, PA 16651
Date of Sheriff's Sale: September 2, 2005***

Dear Sheriff:

As you know, the above-captioned matter is currently scheduled for the September 2, 2005 Sheriff's Sale. I am requesting at this time that you postpone this matter to the October 7, 2005 Sheriff's Sale.

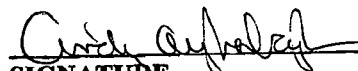
As acknowledgment of this postponement, I would appreciate your signing or time-stamping a copy of this letter and faxing the same to my attention. Thank you for your cooperation.

Very truly yours,


TERRENCE J. McCABE

TJM/cmo

SHERIFF'S OFFICE-RECEIVED BY:


SIGNATURE

8-25-05 9:00 am
DATE

C O V E R

FAX

S H E E T

To: Sheriff of Clearfield County

Attn: Cindy

Fax #: 814-765-5915

Subject: Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of
Pennsylvania vs. Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett
Clearfield County; CCP; Number 04-1994-0
Sheriff's Sale: 10/7/05

Date: August 24, 2005

Pages: 2, including cover page

COMMENTS:

Please see the attached letter requesting that you undo the Sheriff's Sale which took place
on 10/7/05.

From the desk of...
Liz DeSimone
Legal Assistant
McCabe, Weisberg & Conway
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October 18, 2005

Sheriff of Clearfield County
Clearfield County Courthouse
230 East Market Street
Clearfield, PA 16830
Attn: Cindy

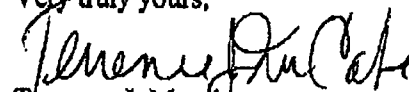
Re: Beneficial Consumer Discount Company d/b/a Beneficial Mortgage Co. of Pennsylvania
vs. Linda L. Plunkett a/k/a Linda L. Dowd and Roy A. Plunkett
Clearfield County; CCP; Number 04-1994-0
Sheriff's Sale: 10/7/05

Dear Cindy:

With regard to the above-captioned matter, the Defendants filed a Chapter 13 Bankruptcy on 10/6/05 in the Western District of PA under # 05-72502, making our Sheriff's Sale invalid. Please undo the sale to the BK and return any available distribution monies to our attention.

If you are in need of any further information, please feel free to contact me. Thank you for your courtesy and cooperation.

Very truly yours,


Terrence J. McCabe

TJM/lid

SHERIFF'S OFFICE-RECEIVED BY:

SIGNATURE

DATE