

05-716-CD
Citifinancial vs. C. Whitmore, et al

Citifinancial Serv v. Christine Whitmore e
2005-716-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

CITIFINANCIAL SERVICES INC.
7467 New Ridge Road
Suite 200
Hanover, MD 21076

Plaintiff

vs.

CHRISTINE E. WHITMORE
RICKY L. WHITMORE
and OCCUPANTS
116 Evergreen Street
Dubois, PA 15801

Defendants

IN THE COURT OF COMMON PLEAS
OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF EJECTMENT

Term
No. 05-716-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

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.

RECUEDE: SI USTED NO RESPONDE 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 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
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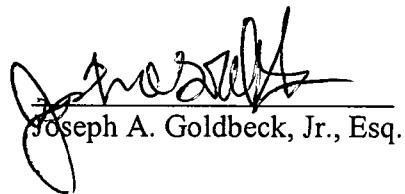
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MAY 17 2005
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William A. Shaw
Prothonotary/Clerk of Courts

COMPLAINT IN EJECTMENT

1. Plaintiff is CITIFINANCIAL SERVICES INC., 7467 New Ridge Road, Suite 200, Hanover, MD 21076.
2. Defendants are CHRISTINE E. WHITMORE, RICKY L. WHITMORE, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises 116 Evergreen Street, Dubois, PA 15801 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 May 06, 2005.
5. Plaintiff, by virtue of the above, is the equitable owner of said premises, and is entitled to possession thereof. The Defendants, CHRISTINE E. WHITMORE, RICKY L. WHITMORE 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.

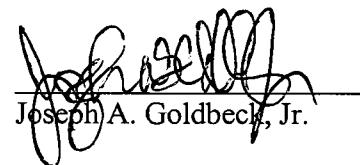


Joseph A. Goldbeck, Jr., Esq.

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: 5-16-05



A handwritten signature in black ink, appearing to read "Joseph A. Goldbeck, Jr." The signature is fluid and cursive, with "Joseph" and "A." being more stylized, and "Goldbeck, Jr." being more legible in a standard script.

#2000510225041 - CHRISTINE E. WHITMORE and RICKY L. WHITMORE

ALL THAT CERTAIN PARCEL OF LAND IN 1ST WARD OF THE CITY OF DUBOIS,
CLEARFIELD COUNTY, COMMONWEALTH OF PENNSYLVANIA, AS MORE FULLY
DESCRIBED IN DEED BOOK 831, PAGE 321, ID# 7.1-07-02034, BEING KNOWN AND
DESIGNATED AS LOT 11, ALFRED BELL'S ADDITION TO DUBOIS.

BEING PREMISES WHICH ARE MORE FULLY DECSRIBED IN A DEED DATED 4/21/82
AND RECORDED 4/26/82 IN THE OFFICE OF THE RECORDER OF DEEDS OF
CLEARFIELD COUNTY, PENNSYLVANIA, IN RECORD BOOK 831 PAGE 321.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100482
NO: 05-716-CD
SERVICE # 1 OF 3
COMPLAINT IN EJECTMENT

PLAINTIFF: CITIFINANCIAL SERVICES INC

vs.

DEFENDANT: CHRISTINE E. WHITMORE and RICKY L. WHITMORE

SHERIFF RETURN

NOW, May 20, 2005 AT 1:05 PM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON CHRISTINE E. WHITMORE DEFENDANT AT 116 EVERGREEN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CHRISTINE E. WHITMORE, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN / COUDRIET

CM FILED
05/22/05
MAY 25 2005

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100482
NO: 05-716-CD
SERVICE # 2 OF 3
COMPLAINT IN EJECTMENT

PLAINTIFF: CITIFINANCIAL SERVICES INC

VS.

DEFENDANT: CHRISTINE E. WHITMORE and RICKY L. WHITMORE

SHERIFF RETURN

NOW, May 20, 2005 AT 1:05 PM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON RICKY L. WHITMORE DEFENDANT AT 116 EVERGREEN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CHRISTINE WHITMORE, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN / COUDRIET

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100482
NO: 05-716-CD
SERVICE # 3 OF 3
COMPLAINT IN EJECTMENT

PLAINTIFF: CITIFINANCIAL SERVICES INC
VS.
DEFENDANT: CHRISTINE E. WHITMORE and RICKY L. WHITMORE

SHERIFF RETURN

NOW, May 20, 2005 AT 1:05 PM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON OCCUPANT(s) (WHITMORE PROPERTY) DEFENDANT AT 116 EVERGREEN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CHRISTINE WHITMORE, OWNER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN / COUDRIET

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100482
NO: 05-716-CD
SERVICES 3
COMPLAINT IN EJECTMENT

PLAINTIFF: CITIFINANCIAL SERVICES INC

vs.

DEFENDANT: CHRISTINE E. WHITMORE and RICKY L. WHITMORE

SHERIFF RETURN

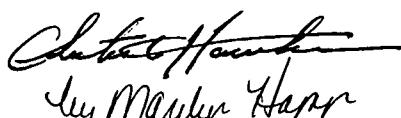
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	227268	30.00
SHERIFF HAWKINS	GOLDBECK	227268	45.39

Sworn to Before Me This

____ Day of _____ 2005

So Answers,



by Marilyn Harr

Chester A. Hawkins
Sheriff

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

November 14, 2006

PROTHONOTARY OF CLEARFIELD COUNTY

William Shaw
Prothonotary of Clearfield County
230 E. Market Street
Clearfield, PA 16830

RE: Docket Number: Term; No.: 05-716-CD

To the Prothonotary:

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

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

Goldbeck McCafferty & McKeever

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

OIC

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

CITIFINANCIAL SERVICES INC.
7467 New Ridge Road
Suite 200
Hanover, MD 21076

Plaintiff

vs.

CHRISTINE E. WHITMORE
RICKY L. WHITMORE
and OCCUPANTS
116 Evergreen Street
Dubois, PA 15801

IN THE COURT OF COMMON PLEAS
of Clearfield County

No. 05-716-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
11/21/06
William A. Shaw
Prothonotary/Clerk of Courts