

05-717-CD  
The Cit Group vs. Helen Williams

The CIT Group v. Helen Williams  
2005-717-CD

In the Court of Common Pleas of Clearfield County

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

Plaintiff

vs.

HELEN L. WILLIAMS  
(Mortgagor(s) and Record Owner(s))  
RD #1 Box 79  
Clearfield, PA 16830

No. 05-717-CD

Defendant(s)

PRAECIPE FOR JUDGMENT

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT  
OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE  
OF COLLECTING THE DEBT.**

Enter the Judgment in favor of Plaintiff and against HELEN L. WILLIAMS by default for want of an Answer.

Assess damages as follows:

\$62,239.02

Debt

Interest - 11/24/2004 to 06/27/2005

Total

(Assessment of Damages attached)

**I CERTIFY THAT FOREGOING ASSESSMENT OF DAMAGES IS FOR SPECIFIED AMOUNTS ALLEGED TO  
BE DUE IN THE COMPLAINT AND IS CALCULABLE AS A SUM CERTAIN FROM THE COMPLAINT.**

I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his attorney of record, if any, after the default occurred and at least ten days prior to the date of the filing of this praecipe. A copy of the notice is attached. R.C.P. 237.1

  
Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff  
I.D. # 6132

AND NOW June 29, 2005, Judgment is entered in favor of THE  
CIT GROUP/CONSUMER FINANCE INC. and against HELEN L. WILLIAMS by default for want of an Answer and  
damages assessed in the sum of \$62,239.02 as per the above certification.

  
Prothonotary

**FILED** Atty pd. 20.00  
m/15/05 Notice to Def.  
JUN 29 2005 Statement to Atty  
William A. Shaw  
Prothonotary/Clerk of Courts

THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO  
COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED  
FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.

DATE OF THIS NOTICE: June 13, 2005

TO:

HELEN L. WILLIAMS  
RD #1 Box 79  
Clearfield, PA 16830

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

*Plaintiff*

vs.

HELEN L. WILLIAMS  
(Mortgagor(s) and Record Owner(s))  
RD #1 Box 79  
Clearfield, PA 16830

*Defendant(s)*

IN THE COURT OF COMMON  
PLEAS  
of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE  
FORECLOSURE

Term  
No. 05-717-CD

TO: HELEN L. WILLIAMS  
RD #1 Box 79  
Clearfield, PA 16830

**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.

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

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

  
GOLDBECK McCAFFERTY & McKEEVER  
By Joseph A. Goldbeck, Jr., Esq.  
Attorney for Plaintiff  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106 215-627-1322

THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.

DATE OF THIS NOTICE: June 13, 2005

TO:

**HELEN L. WILLIAMS**

74 Patton Street  
Clearfield, PA 16830

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

*Plaintiff*

vs.

**HELEN L. WILLIAMS**  
(Mortgagor(s) and Record Owner(s))  
RD #1 Box 79  
Clearfield, PA 16830

In the Court of Common Pleas  
of Clearfield County

**CIVIL ACTION - LAW**

**ACTION OF  
MORTGAGE FORECLOSURE**

Term  
No. 05-717-CD

*Defendant(s)*

TO: **HELEN L. WILLIAMS**  
74 Patton Street  
Clearfield, PA 16830

**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.

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PENNSYLVANIA BAR ASSOCIATION  
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Harrisburg, PA 17108  
800-692-7375

  
**GOLDBECK McCAFFERTY & MCKEEVER**  
 BY: Joseph A. Goldbeck, Jr., Esq.  
 Attorney for Plaintiff  
 Suite 5000 - Mellon Independence Center  
 701 Market Street  
 Philadelphia, PA 19106 215-627-1322

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

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

Plaintiff

vs.

HELEN L. WILLIAMS  
(Mortgagor(s) and Record owner(s))  
RD #1 Box 79  
Clearfield, PA 16830

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

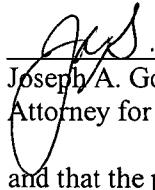
CIVIL ACTION LAW

ACTION OF MORTGAGE FORECLOSURE

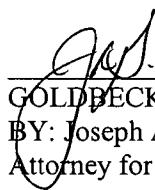
No. 05-717-CD

**ORDER FOR JUDGMENT**

Please enter Judgment in favor of THE CIT GROUP/CONSUMER FINANCE INC., and against HELEN L. WILLIAMS for failure to file an Answer in the above action within (20) days (or sixty (60) days if defendant is the United States of America) from the date of service of the Complaint, in the sum of \$62,239.02.

  
Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

I hereby certify that the above names are correct and that the precise residence address of the judgment creditor is THE CIT GROUP/CONSUMER FINANCE INC. 10500 Barkley Suite 102 Overland Park, KS 66212 and that the name(s) and last known address(es) of the Defendant(s) is/are HELEN L. WILLIAMS, 74 Patton Street Clearfield, PA 16830;

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

ASSESSMENT OF DAMAGES

TO THE PROTHONOTARY:

Kindly assess the damages in this case to be as follows:

Principal Balance	\$56,598.65
Interest from 11/24/2004 through 06/27/2005	\$3,315.59
Reasonable Attorney's Fees	\$1,250.00
Late Charges	\$174.78
Costs of Suit and Title Search	\$900.00
	<hr/>
	\$62,239.02

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

AND NOW, this 29<sup>th</sup> day of June, 2005 damages are assessed as above.

*Wm. H. Prothy*  
Pro Prothy

VERIFICATION OF NON-MILITARY SERVICE

The undersigned, as the representative for the Plaintiff corporation within named do hereby verify that I am authorized to make this verification on behalf of the Plaintiff corporation and that the facts set forth in the foregoing verification of Non-Military Service are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

1. That the above named Defendant, HELEN L. WILLIAMS, is about unknown years of age, that Defendant's last known residence is 74 Patton Street, Clearfield, PA 16830, and is engaged in the unknown business located at unknown address.

2. That Defendant 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 Action of Congress of 1940 and its Amendments.

Date: 6/27/85

JAS.

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

 COPY

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

Plaintiff

No. 05-717-CD

vs.

HELEN L. WILLIAMS  
(**Mortgagors and Record Owner(s)**)  
RD #1 Box 79  
Clearfield, PA 16830

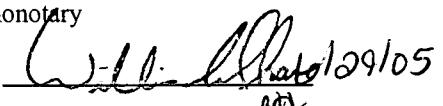
Defendant(s)

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT  
OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE  
PURPOSE OF COLLECTING THE DEBT.**

NOTICE

Notice is given that a judgment in the above-captioned matter has been entered against you.

William Shaw  
Prothonotary

By: 

Deputy

If you have any questions concerning the above, please contact:

Joseph A. Goldbeck, Jr.  
**Goldbeck McCafferty & McKeever**  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322

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

 COPY

The CIT Group/Consumer Finance, Inc.  
Plaintiff(s)

No.: 2005-00717-CD

Real Debt: \$62,239.02

Atty's Comm: \$

Vs.

Costs: \$

Helen L. Williams  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: June 29, 2005

Expires: June 29, 2010

Certified from the record this 29th day of June, 2005.

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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

**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

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

*Plaintiff*

vs.

HELEN L. WILLIAMS  
**Mortgagor and Real Owner**  
RD #1 Box 79  
Clearfield, PA 16830

*Defendant*

**FILED** Atty pd.  
MAY 17 2005 85.00  
MAY 17 2005 2CCShff

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term No.

05-717-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 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. 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.

KEYSTONE LEGAL SERVICES

211 1/2 E. Locust Street

Clearfield, PA 16830

814-765-9646

PENNSYLVANIA BAR ASSOCIATION

P.O. Box 186

Harrisburg, PA 17108

800-692-7375

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 COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIRA QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

USTED DEBE LLEVAR ESTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELEFONO LA OFICINA FIJADA AQUI ABAJO. ESTA OFICINA PUEDE PROVEER CON INFORMACION DE COMO CONSEUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ESTA OFICINA PUEDE PROVEER INFORMACION ACERCA AGENCIAS QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQUUN HONORARIO REDUCIDO O GRATIS.

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

PENNSYLVANIA BAR ASSOCIATION  
P.O. Box 186  
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800-692-7375

**THIS FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT  
A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU  
WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

Resources available for Homeowners in Foreclosure

**ACT NOW!**

Even though your lender (and our client) has filed an Action of Mortgage Foreclosure against you, you still may be able to **SAVE YOUR HOME FROM FORECLOSURE**.

- 1). Call an attorney. For referrals to a qualified attorney call either of the following numbers: 814-765-9646 or 800-692-7375.
- 2). Call Pennsylvania Housing Finance Agency at 800-342-2397 for a counseling agency in your neighborhood.
- 3). Visit HUD'S website [www.hud.gov/offices/hsg/sfh/econ/econ.cfm](http://www.hud.gov/offices/hsg/sfh/econ/econ.cfm) for Help for Homeowners Facing the Loss of Their Homes.
- 4). Call your lender and ask to speak to someone about Loss Mitigation or Home Retention options.
- 5). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout / Home Retention Package. Call Carol at 215-825-6329 or Nancy at 215-825-6358 or fax 215-825-6429 or 215-825-6458. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is Edward Sparkman who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of FMC-0026.

Para informacion en espanol puede comunicarse con Loretta al 215-825-6344.

**This Action of Mortgage Foreclosure will continue unless you take action to stop it.**

## COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff is THE CIT GROUP/CONSUMER FINANCE INC., 10500 Barkley, Suite 102 Overland Park, KS 66212.
2. The name and address of the Defendant is HELEN L. WILLIAMS, 74 Patton Street, Clearfield, PA 16830, who is the mortgagor and real owner of the mortgaged premises hereinafter described.
3. On May 24, 2002 mortgagor made, executed and delivered a mortgage upon the premises hereinafter described to THE CIT GROUP/CONSUMER FINANCE INC., which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Instrument #200208726.. The Mortgage and Assignment(s) are matters of public record and are incorporated by this reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g) which Rule relieves the Plaintiff from its obligation to attach documents to pleadings if those documents are matters of public record.
4. The Property subject to the Mortgage is more fully described in the legal description set forth as Exhibit "A".
5. The mortgage is in default because monthly payment of principal and interest upon said mortgage due December 24, 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.
6. The following amounts are due on the mortgage:

Principal Balance	\$56,598.65
Interest from 11/24/2004	\$2,901.14
through 05/31/2005 at 9.9000%	
Per Diem interest rate at \$15.35	
Reasonable Attorney's Fee	\$1,250.00
If the Mortgage is reinstated prior to a Sheriff's Sale the Attorney's Fees may be less than this amount based on work actually performed. The Attorney's Fees requested are in conformity with the Mortgage and Pennsylvania law. Plaintiff reserves its right to collect Attorney's fees of up to 5% of the remaining principal balance (\$2,829.93) in the event the Property is sold to a third party purchaser at Sheriff's Sale or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.	
Late Charges from 12/24/2004 to 05/31/2005	\$149.81
Monthly late charge amount at \$24.97	
Costs of suit and Title Search	<hr/> \$900.00
	\$61,799.60

7. Plaintiff is not seeking a judgment of personal liability (or in personam judgment) against the Defendant in this Action but reserves it's right to bring a separate Action to establish that right, if such right exists. If Defendant has received a discharge of their personal liability in a Bankruptcy proceeding, this Action of Mortgage Foreclosure is, in no way, an attempt to re-establish the personal liability that was discharged in Bankruptcy, but only to foreclose the Mortgage and sell the Property pursuant to Pennsylvania law.

8. Notice of Intention to Foreclose and a Notice of Homeowners' Emergency Mortgage Assistance has been sent to Defendant by Certified and regular mail, as required by Act 160 of 1998 of the Commonwealth of Pennsylvania, on the date(s) set forth in the true and correct copy of such notice(s) attached hereto as Exhibit "B". The Defendant has not had the required face-to-face meeting within the required time and Plaintiff has no knowledge of any such meeting being requested by the Defendant through the Plaintiff, the Pennsylvania Housing Finance Agency, or any appropriate Consumer Credit Counseling Agency.

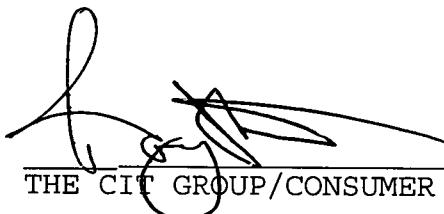
WHEREFORE, Plaintiff demands a de terris judgment in mortgage foreclosure in the sum of \$61,799.60, together with interest at the rate of \$15.35, per day and other expenses incurred by the Plaintiff which are properly chargeable in accordance with the terms of the Mortgage and Pennsylvania law, and for the foreclosure of the Mortgage and Sheriff's Sale of the Property.

By   
**GOLDBECK McCAFFERTY & MCKEEVER**  
BY: JOSEPH A. GOLDBECK, JR., ESQUIRE  
ATTORNEY FOR PLAINTIFF

VERIFICATION

I, ROY STRINGFELLOW, V.P., as the representative 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



THE CIT GROUP/CONSUMER FINANCE INC.

# *Exhibit A*

**EXHIBIT "A"**  
**LEGAL DESCRIPTION**

**ALL THAT CERTAIN**, piece or parcel of ground, together with buildings and improvements thereon situated in Lawrence Township, Clearfield County, Pennsylvania, more particularly described as follows:

**BEGINNING** at a post at the Northeast corner of Patton Street and Kerr Avenue, thence by Kerr Avenue South eighty-four (84) degrees East one hundred forty (140) feet to a post corner; thence in a northerly direction on a line parallel with Patton Street seventy-five (75) feet to a post corner of a lot owned or formerly owned by William A. Loss and Maud E. Loss, husband and wife; thence by said lot North eighty-four (84) degrees West on a line parallel with Kerr Avenue one hundred forty (140) feet to a post corner on Patton Street; thence by Patton Street in a southerly direction seventy-five (75) feet to a post corner and place of beginning.

**BEING** the same premises which Charles B. Bowman, Administrator of the Estate of Lula M. Bowman, by deed dated October 30, 1985 and recorded February 18, 1986 in Clearfield County in Deed Book Volume 1065 at Page 135, granted and conveyed unto Robert B. Williams and Helen L. Williams, husband and wife. The said Robert B. Williams departed this life on January 10, 2002 thereby vesting fee simple title into his surviving spouse, the Mortgagor herein.

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# *Exhibit B*

# ACT 91 NOTICE

## DATE OF NOTICE: April 12, 2005

## TAKE ACTION TO SAVE YOUR

## HOME FROM FORECLOSURE

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

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

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

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

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

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact any attorney in your area. The local bar association may be able to help you find a lawyer.

La notificacion en adjunto es de suma importancia, pues afecta su derecho a continuar viviendo en su casa. Si no comprende el contenido de esta notification obtenga una traducion inmediatamente llamanda esta agencia (Pennsylvania Housing Finance Agency) sin cargos al numero mencionada arriba. Puedes ser elegible para un prestamo por el programa llamado "Homeowner's Emergency Mortgage Assistance Program" el cual puede salvar su casa de la perdida del derecho a redimir su hipoteca.

Prepared by: GOLDBECK McCAFFERTY & McKEEVER  
Suite 5000 - Mellon Independence Center.  
701 Market Street  
Philadelphia, PA 19106  
Fax (215) 627-7734

Date: April 12, 2005

Homeowners Name: **HELEN L. WILLIAMS**

Property Address: **RD #1 Box 79, Clearfield, PA 16830**

Loan Account No.: **32163PA04**

Original Lender: **THE CIT GROUP/CONSUMER FINANCE INC.**

Current Lender/Servicer: **FORECLOSURE MANAGEMENT COMPANY**

**HOMEOWNERS'  
EMERGENCY MORTGAGE ASSISTANCE PROGRAM**

**YOU MAY BE ELIGIBLE FOR FINANCIAL  
ASSISTANCE WHICH CAN SAVE YOUR HOME FROM  
FORECLOSURE AND HELP YOU MAKE FUTURE  
MORTGAGE PAYMENTS**

**IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S  
EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE  
ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:**

**\* IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR  
CONTROL,**

**\* IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR  
MORTGAGE PAYMENTS, AND**

**\* IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE  
PENNSYLVANIA HOUSING FINANCE AGENCY.**

**TEMPORARY STAY OF FORECLOSURE** - Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the designated consumer credit counseling agencies listed at the end of this Notice.

**THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT  
APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR  
MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE  
YOUR MORTGAGE DEFAULT", EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO  
DATE.**

**CONSUMER CREDIT COUNSELING AGENCIES** - If you meet with one of the consumer credit counseling agencies listed at the end of this notice, the lender may **NOT** take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set

forth at the end of this Notice. It is only necessary to schedule one face-to-face meeting. Advise your lender immediately of your intentions.

**APPLICATION FOR MORTGAGE ASSISTANCE** - Your mortgage is in default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application **MUST** be filed or postmarked within thirty (30) days of your fact-to-face meeting.

**YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.**

**AGENCY ACTION** - Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

---

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

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

---

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

**NATURE OF THE DEFAULT** - The MORTGAGE debt held by the above lender on your property located at: **RD #1 Box 79, Clearfield, PA 16830** IS SERIOUSLY IN DEFAULT because:

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

- (a) Monthly payment from 12/24/2004 thru 4/12/2005  
(5 mos. at \$499.49/month) \$2,497.45
- (b) Late charges from 12/24/2004 thru 4/12/2005  
(5 mos. at \$24.97/month) \$124.84
- (c) Other charges; Escrow, Inspec., NSF Checks
- (d) Other provisions of the mortgage obligation, if any
- (e) TOTAL AMOUNT REQUIRED AS OF THIS DATE: \$2,622.29

**HOW TO CURE THE DEFAULT** - You may cure the default within **THIRTY (30) DAYS** of the date of this notice **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER WHICH IS \$2,622.29, PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD.** Payments must be made either by cashier's check, certified check or money order made payable and sent to:

FORECLOSURE MANAGEMENT COMPANY  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

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

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

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

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

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

**EARLIEST POSSIBLE SHERIFF'S SALE DATE** - It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be approximately four (4) to six (6) months from the date of this Notice. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

**HOW TO CONTACT THE LENDER:**

Name of Lender: FORECLOSURE MANAGEMENT COMPANY

Address: 10500 Barkley  
Suite 102  
Overland Park, KS 66212

Phone Number: 913-383-0202 x1011

Fax Number: 913-648-0825

Contact Person: Sergio Delgado

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

**ASSUMPTION OF MORTGAGE** - You may sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

**YOU MAY ALSO HAVE THE RIGHT:**

\* TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.

\* TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.

\* TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT

HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)

\* TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS.

\* TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.

\* TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

Contact Person: Sergio Delgado  
Phone Number: 913-383-0202 x1011

**PENNSYLVANIA HOUSING FINANCE AGENCY**  
**HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM**

**CONSUMER CREDIT COUNSELING AGENCIES**

**CLEARFIELD COUNTY**

KEYSTONE ECONOMIC DEVELOPMENT CORPORATION  
1954 Mary Grace Lane  
Johnstown, PA 15901  
(814) 535-6556  
FAX (814) 539-1688

CCCS OF WESTERN PENNSYLVANIA INC.  
217 East Plank Road  
Altoona, PA 16602  
(814) 944-8100  
FAX (814) 944-5747

CCCS OF WESTERN PENNSYLVANIA  
219-A College Park Plaza  
Johnstown, PA 15904  
(814) 539-6335

INDIANA CO COMMUNITY ACTION PROGRAM  
827 Water Street, Box 187  
Indiana, PA 15701  
(724) 465-2657  
FAX (412) 465-5118

CCCS OF NORTHEASTERN PA  
1631 South Atherton Street  
Suite 100  
State College, PA 16801  
(814) 238-3668  
FAX (814) 238-3669

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100483  
NO: 05-717-CD  
SERVICE # 1 OF 2  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE INC.  
vs.  
DEFENDANT: HELEN L. WILLIAMS

**SHERIFF RETURN**

---

NOW, May 23, 2005 AT 8:03 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON HELEN L. WILLIAMS DEFENDANT AT RD#1 BOX 79, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO HELEN L. WILLIAMS, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / NEVLING

cr FILED  
05-29-05  
MAY 25 2005

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100483  
NO: 05-717-CD  
SERVICE # 2 OF 2  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE INC.

vs.

DEFENDANT: HELEN L. WILLIAMS

**SHERIFF RETURN**

---

NOW, May 23, 2005 AT 8:03 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON HELEN L. WILLIAMS DEFENDANT AT 74 PATTON ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO HELEN L. WILLIAMS, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / NEVLING

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100483  
NO: 05-717-CD  
SERVICES 2  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE INC.  
vs.  
DEFENDANT: HELEN L. WILLIAMS

**SHERIFF RETURN**

---

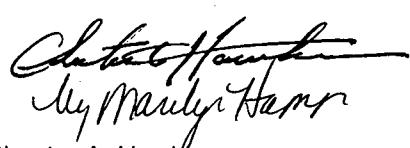
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	227199	20.00
SHERIFF HAWKINS	GOLDBECK	227198	26.00

Sworn to Before Me This

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

So Answers,

  
Chester A. Hawkins  
Sheriff

PRAECIPE FOR WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)  
P.R.C.P 3180-3183

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

THE CIT GROUP/CONSUMER FINANCE INC.

10500 Barkley  
Suite 102  
Overland Park, KS 66212

Plaintiff

vs.

HELEN L. WILLIAMS  
Mortgagor(s) and Record Owner(s)  
RD #1 Box 79  
Clearfield, PA 16830

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 05-717-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Issue Writ of Execution in the above matter:

Amount Due

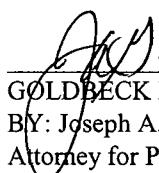
\$62,239.02

Interest from  
11/24/2004 to  
06/27/2005 at  
9.9000%

(Costs to be added)

125.00 Prothonotary costs

FILED  
MAY 5 2005  
JUN 29 2005  
William A. Shaw  
Prothonotary/Clerk of Courts

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

Term  
No. 05-717-CD  
**IN THE COURT OF COMMON PLEAS**  
THE CIT GROUP/CONSUMER FINANCE INC.

vs.

HELEN L. WILLIAMS  
(Mortagor(s) and Record Owner(s))  
RD #1 Box 79  
Clearfield, PA 16830

---

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

---

**FILED**

**JUN 29 2005**

William A. Shaw  
Prothonotary/Clerk of Courts

---

Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

---

Goldbeck McCafferty & McKeever  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322

ALL THAT CERTAIN, piece or parcel of ground, together with buildings and improvements thereon situated in Lawrence Township, Clearfield County, Pennsylvania, more particularly described as follows:

BEGINNING at a post at the Northeast corner of Patton Street and Kerr Avenue, thence by Korr Avenue South eighty-four (84) degrees East one hundred forty (140) feet to a post corner; thence in a northerly direction on a line parallel with Patton Street seventy-five (75) feet to a post corner of a lot owned or formerly owned by William A. Loss and Maud E. Loss, husband and wife; thence by said lot North eighty-four (84) degrees West on a line parallel with Korr Avenue one hundred forty (140) feet to a post corner on Patton Street; thence by Patton Street in a southerly direction seventy-five (75) feet to a post corner and place of beginning.

Property known as: RD 1 Box 79, Clearfield, PA 16830

Tax ID #: 123-K07-258-35 (Control #90784)

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

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

Plaintiff

vs.

HELEN L. WILLIAMS  
(Mortgagor(s) and Record Owner(s))  
RD #1 Box 79  
Clearfield, PA 16830

Defendant(s)

IN THE COURT OF COMMON PLEAS  
of Clearfield County

CIVIL ACTION - LAW  
ACTION OF MORTGAGE FORECLOSURE

No. 05-717-CD

**AFFIDAVIT PURSUANT TO RULE 3129**

THE CIT GROUP/CONSUMER FINANCE INC., 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:

RD #1 Box 79  
Clearfield, PA 16830

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

HELEN L. WILLIAMS  
74 Patton Street  
Clearfield, PA 16830

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

HELEN L. WILLIAMS  
74 Patton Street  
Clearfield, PA 16830

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 CLEARFIELD COUNTY  
230 E. Market Street  
Clearfield, PA 16830

DANMAR CREDIT GROUP, LLC, ASSIGNEE OF BENEFICIAL FINANCE COMPANY C/O  
APPLE AND APPLE, P.C.  
4650 BAUM BOULEVARD  
PITTSBURGH, PA 15213-1237

DANMAR CREDIT GROUP, LLC, ASSIGNEE OF BENEFICIAL FINANCE COMPANY  
3819 18TH STREET  
METAIRIE, LA 70002

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.

TENANTS/OCCUPANTS  
RD #1 Box 79  
Clearfield, PA 16830

(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: June 27, 2005

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

WRIT OF EXECUTION – (MORTGAGE FOR ECLOSURE)  
P.R.C.P. 3180-3183 AND Rule 3257

 COPY

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

vs.

HELEN L. WILLIAMS  
RD #1 Box 79  
Clearfield, PA 16830

In the Court of Common Pleas of  
Clearfield County

No. 05-717-CD

WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield

**To the Sheriff of Clearfield County, Pennsylvania**

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

PREMISES: RD #1 Box 79 Clearfield, PA 16830

See Exhibit "A" attached

AMOUNT DUE	
	<u>\$62,239.02</u>

Interest From 11/24/2004  
Through 06/27/2005

(Costs to be added)

<b>Prothonotary costs</b>	<u>125.00</u>
---------------------------	---------------



Prothonotary, Common Pleas Court  
of Clearfield County, Pennsylvania

Deputy

Dated: 6/29/05

Term  
No. 05-717-CD

IN THE COURT OF COMMON PLEAS  
THE CIT GROUP/CONSUMER FINANCE INC.

vs.

HELEN L. WILLIAMS

Mortgor(s)

RD #1 Box 79 Clearfield, PA 16830

WRIT OF EXECUTION  
(Mortgage Foreclosure)

\$62,239.02

REAL DEBT

INTEREST from

COSTS PAID:

PROTHY

SHERIFF

STATUTORY

COSTS DUE PROTHY

Office of Judicial Support

Judg. Fee

Cr.

Sat.

Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

Goldbeck McCafferty & McKeever  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
(215) 627-1322

ALL THAT CERTAIN, piece or parcel of ground, together with buildings and improvements thereon situated in Lawrence Township, Clearfield County, Pennsylvania, more particularly described as follows:

BEGINNING at a post at the Northeast corner of Patton Street and Kerr Avenue, thence by Korr Avenue South eighty-four (84) degrees East one hundred forty (140) feet to a post corner; thence in a northerly direction on a line parallel with Patton Street seventy-five (75) feet to a post corner of a lot owned or formerly owned by William A. Loss and Maud E. Loss, husband and wife; thence by said lot North eighty-four (84) degrees West on a line parallel with Korr Avenue one hundred forty (140) feet to a post corner on Patton Street; thence by Patton Street in a southerly direction seventy-five (75) feet to a post corner and place of beginning.

Property known as: RD 1 Box 79, Clearfield, PA 16830

Tax ID #: 123-K07-258-35 (Control #90784)

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

FMC-0026  
CF: 05/17/2005  
SD: 11/04/2005  
\$62,239.02

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

Plaintiff  
vs.

HELEN L. WILLIAMS  
Mortgagor(s) and  
Record Owner(s)

RD #1 Box 79  
Clearfield, PA 16830

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION – LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 05-717-CD

FILED NO CC  
m 11/4530  
OCT 13 2005  
LS

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:

**Served N.O.S. ON 9-20-05 per Cindy@S.O.**

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

4199  
0843  
0002  
0000  
0390  
0360  
0005  
7005

<b>U.S. Postal Service™</b>	
<b>CERTIFIED MAIL™ RECEIPT</b>	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
<b>OFFICIAL USE</b>	
Postage	\$
Certified Fee	Yes
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	2.67
Total Postage & Fees	\$
FMC-0026 11/4	
Sent To HELEN L. WILLIAMS	
Street, Apt. No.; RD #1 BOX 79	
or PO Box No.	
City, State, ZIP+4 CLEAREFIELD, PA 16830	

Postmark  
Here

See Reverse for Instructions

### **Certified Mail Provides:**

- 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.**

4090 0843 0890

0002 0000 0390 0390 0395 0395 0397

**U.S. Postal Service™  
CERTIFIED MAIL™ RECEIPT  
(Domestic Mail Only; No Insurance Coverage Provided)**

For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$ 0.60
Certified Fee	Yes
Return Receipt Fee (Endorsement Required)	Yes
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.65

*Postmark Here*

**Sent To** FMC=0026 11/4  
WILLIAMS, HELEN L.  
Street, Apt. No.; 74 Patton Street  
or PO Box No.  
City, State, ZIP+4 Clearfield, PA 16830

PS Form 3800, June 2002      See Reverse for Instructions

### **Certified Mail Provides:**

- 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.**

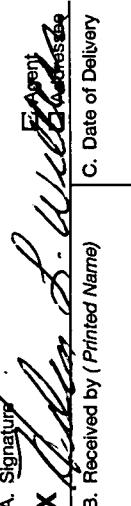
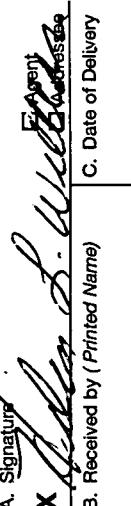
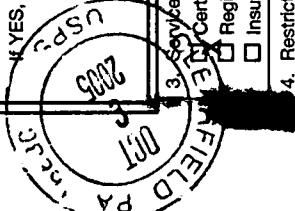
**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

**1. Article Addressed to:**

FMC-0026 114  
**WILLIAMS, HELEN L.**  
74 Patton Street  
Clearfield, PA 16830

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature 	B. Received by (Printed Name) 	C. Date of Delivery
D. Is delivery address different from item 1? If YES, enter delivery address below: 		<input type="checkbox"/> Yes <input type="checkbox"/> No
2. Article Number (Transfer from service label)	 * 7 0 0 5 0 3 9 0 0 0 2 0 8 4 3 4 0 9 0 *	
PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540		

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

- **Sender:** Please print your name, address, and ZIP+4 in this box •

GOLDBECK MC CAGGERTY  
STE 5000 - MELLON & MCKEEVER  
701 MARKET ST  
PHILADELPHIA PA 19106-1538  
INDEPENDENCE CENTER

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**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

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

Plaintiff

vs.

HELEN L. WILLIAMS  
**Mortgagor(s) and Record Owner(s)**

RD #1 Box 79  
Clearfield, PA 16830

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 05-717-CD

**AFFIDAVIT PURSUANT TO RULE 3129**

THE CIT GROUP/CONSUMER FINANCE INC., 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:

RD #1 Box 79  
Clearfield, PA 16830

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

HELEN L. WILLIAMS  
74 Patton Street  
Clearfield, PA 16830

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

HELEN L. WILLIAMS  
74 Patton Street  
Clearfield, PA 16830

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 CLEARFIELD COUNTY  
230 E. Market Street  
Clearfield, PA 16830

DANMAR CREDIT GROUP, LLC, ASSIGNEE OF BENEFICIAL FINANCE COMPANY C/O  
APPLE AND APPLE, P.C.  
4650 BAUM BOULEVARD  
PITTSBURGH, PA 15213-1237

DANMAR CREDIT GROUP, LLC, ASSIGNEE OF BENEFICIAL FINANCE COMPANY  
3819 18TH STREET  
METAIRIE, LA 70002

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.

TENANTS/OCCUPANTS  
RD #1 Box 79  
Clearfield, PA 16830

(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: October 5, 2005

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100665  
NO: 05-786-CD  
SERVICE # 1 OF 1  
COMPLAINT

PLAINTIFF: HARLEYSVILLE as subrogee of IRVIN TRUCKING INC  
vs.  
DEFENDANT: TYLER D. FURROW

**SHERIFF RETURN**

NOW, July 28, 2005 AT 9:46 AM SERVED THE WITHIN COMPLAINT ON TYLER D. FURROW DEFENDANT AT 3067 MORRISDALE ALLPORT HWY., PHILIPSBURG, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO BRITTNEY FURROW, SISTER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / NEVLING

**FILED**

019:44 AM  
OCT 13 2005

William A. Shaw  
Prothonotary/Clerk of Courts

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	HENNESSY	31418	10.00
SHERIFF HAWKINS	HENNESSY	31418	21.96

Sworn to Before Me This

So Answers,

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

*Chester A. Hawkins*  
*by Harley Hause*

Chester A. Hawkins  
Sheriff

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME HELEN L. WILLIAMS

NO. 05-717-CD

NOW, January 12, 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 November 04, 2005, I exposed the within described real estate of Helen L. Williams to public venue or outcry at which time and place I sold the same to THE CIT GROUP/CONSUMER FINANCE INC. he/she being the highest bidder, for the sum of \$1.00 plus costs and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	15.00
SERVICE	15.00
MILEAGE	2.00
LEVY	15.00
MILEAGE	2.00
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	4.44
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	
<b>TOTAL SHERIFF COSTS</b>	<b>\$189.44</b>

**DEED COSTS:**

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	28.50
TRANSFER TAX 2%	0.00
<b>TOTAL DEED COSTS</b>	<b>\$28.50</b>

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	62,239.02
INTEREST @ 16.8800 %	5,823.60
FROM 11/24/2004 TO 11/04/2005	
PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	20.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	
<b>TOTAL DEBT AND INTEREST</b>	<b>\$68,082.62</b>
<b>COSTS:</b>	
ADVERTISING	314.68
TAXES - COLLECTOR	
TAXES - TAX CLAIM	1,185.67
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	28.50
SHERIFF COSTS	189.44
LEGAL JOURNAL COSTS	162.00
PROTHONOTARY	125.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	11.80
<b>TOTAL COSTS</b>	<b>\$2,162.09</b>

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20201  
NO: 05-717-CD

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE INC.

VS.

DEFENDANT: HELEN L. WILLIAMS

Execution REAL ESTATE

**SHERIFF RETURN**

DATE RECEIVED WRIT: 06/29/2005

LEVY TAKEN 09/20/2005 @ 10:40 AM

POSTED 09/20/2005 @ 10:40 AM

SALE HELD 11/04/2005

SOLD TO THE CIT GROUP/CONSUMER FINANCE INC.

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 01/12/2006

DATE DEED FILED 01/12/2006

PROPERTY ADDRESS RD #1, BOX 79 A/K/A 74 PATTON STREET CLEARFIELD , PA 16830

**SERVICES**

09/20/2005 @ 10:40 AM SERVED HELEN L. WILLIAMS

SERVED HELEN L. WILLIAMS, DEFENDANT, AT HER RESIDENCE RD #1, BOX 79 A/K/A 74 PATTON STREET, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO HELEN L. WILLIAMS

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.

FILED  
01/31/06  
JAN 12 2006  
LM

William A. Shaw  
Prothonotary/Clerk of Courts

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

DOCKET # 20201  
NO: 05-717-CD

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE INC.

vs.

DEFENDANT: HELEN L. WILLIAMS

Execution REAL ESTATE

## **SHERIFF RETURN**

SHERIFF HAWKINS \$189.44

**SURCHARGE \$20.00 PAID BY ATTORNEY**

### Sworn to Before Me This

## So Answers,

\_\_\_\_ Day of \_\_\_\_\_ 2006

Chester A. Hawkins  
by Cynthia Bitten - Clerk and Deputy  
Chester A. Hawkins  
Sheriff

**WRIT OF EXECUTION – (MORTGAGE FORECLOSURE)**  
**P.R.C.P. 3180-3183 AND Rule 3257**

THE CIT GROUP/CONSUMER FINANCE INC.  
10500 Barkley  
Suite 102  
Overland Park, KS 66212

In the Court of Common Pleas of  
Clearfield County

vs.

HELEN L. WILLIAMS  
RD #1 Box 79  
Clearfield, PA 16830

No. 05-717-CD

WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

## Commonwealth of Pennsylvania:

## County of Clearfield

**To the Sheriff of Clearfield County, Pennsylvania**

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

PREMISES: RD #1 Box 79 Clearfield, PA 16830

See Exhibit "A" attached

AMOUNT DUE \$62,239.02

Interest From 11/24/2004  
Through 06/27/2005

(Costs to be added)

Prothonotary costs 125.00

Dated: 6/29/05

Prothonotary, Common Pleas Court  
of Clearfield County, Pennsylvania

Deputy \_\_\_\_\_

Received June 29, 2005 @ 3:45 P.M.  
Chester A. Hawkins  
by Cynthia Bitter-Aspinwall

Term  
No. 05-717-CD

IN THE COURT OF COMMON PLEAS  
THE CIT GROUP/CONSUMER FINANCE INC.

vs.

HELEN L. WILLIAMS

Mortagor(s)

RD #1 Box 79 Clearfield, PA 16830

WRIT OF EXECUTION  
(Mortgage Foreclosure)

\$62,239.02

\$

125.00

\$

125.00

\$

125.00

\$

125.00

\$

125.00

\$

125.00

REAL DEBT  
INTEREST from  
COSTS PAID:

PROTHY

SHERIFF

STATUTORY

COSTS DUE PROTHY

Office of Judicial Support  
Judge, Fee

Cr.

Sat.

Joseph A. Goldbeck, Jr.  
Attorney for Plaintiff

Goldbeck McCafferty & McKeever  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
(215) 627-1322

ALL THAT CERTAIN, piece or parcel of ground, together with buildings and improvements thereon situated in Lawrence Township, Clearfield County, Pennsylvania, more particularly described as follows:

BEGINNING at a post at the Northeast corner of Patton Street and Kerr Avenue, thence by Korr Avenue South eighty-four (84) degrees East one hundred forty (140) feet to a post corner; thence in a northerly direction on a line parallel with Patton Street seventy-five (75) feet to a post corner of a lot owned or formerly owned by William A. Loss and Maud E. Loss, husband and wife; thence by said lot North eighty-four (84) degrees West on a line parallel with Korr Avenue one hundred forty (140) feet to a post corner on Patton Street; thence by Patton Street in a southerly direction seventy-five (75) feet to a post corner and place of beginning.

Property known as: RD 1 Box 79, Clearfield, PA 16830

Tax ID #: 123-K07-258-35 (Control #90784)