

05-906-CD

Mortgage Electronic vs C Lundquist et al

Netbank v. Charlotte Lundquist et al  
2005-906-CD

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

Plaintiff

NO. 05-906-CD

CLEARFIELD COUNTY

v.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

Defendants

**CIVIL ACTION - LAW**  
**COMPLAINT IN 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.

Lawyer Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend: Jan 23, 2006 Document  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982  
Reinstated/Reissued to Sheriff/Attorney  
for service. W. A. Shaw GK  
Deputy Prothonotary

Oct 18, 2005 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service. W. A. Shaw GK  
Deputy Prothonotary

AUGUST 25, 2005 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service. W. A. Shaw GK  
Deputy Prothonotary

July 21, 2005 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service. W. A. Shaw GK  
Deputy Prothonotary

2-13-2006 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service. W. A. Shaw GK  
Deputy Prothonotary

**FILED** Att'y pd.  
1/3: 3201 B 85.00  
**JUN 23 2005** 2 cc Shff

William A. Shaw  
Prothonotary/Clerk of Courts

10/10/2011

10/10/2011

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IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.

1. Plaintiff is

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff, is or will be, the owner of legal title to the mortgage that is the subject of this action, and nominee for the entity indicated below, which is the owner of the entire beneficial interest in the mortgage:

CHASE HOME FINANCE LLC  
3415 VISION DRIVE  
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 02/20/2004 mortgagor(s) 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, in Mortgage Instrument No: 200403309.
4. The premises subject to said mortgage is described as attached.
5. 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 failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

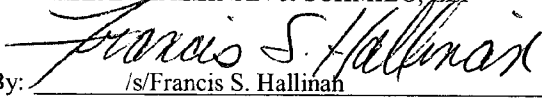
Principal Balance	\$52,735.44
Interest	2,982.45
05/01/2004 through 06/22/2005 (Per Diem \$10.11)	
Attorney's Fees	1,250.00
Cumulative Late Charges	141.04
02/20/2004 to 06/22/2005	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 57,658.93
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>
<b>TOTAL</b>	<b>\$ 57,658.93</b>

7. 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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.
10. Plaintiff hereby releases CARL R. LUNDQUIST, from liability for the debt secured by the mortgage.

11. By virtue of the death of CARL R. LUNDQUIST, on 12/16/01, Defendant CHARLOTTE M. LUNDQUIST became sole owner of the mortgage premised as surviving tenant by the entireties, By deed dated 8/31/04, CHARLOTTE M. LUNDQUIST, widow, deeded the property to CHARLOTTE M. LUNDQUIST, WIDOW and RHONDA L. DAVIDSON, recorded 9/01/04 Instrument No. 2004414379.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 57,658.93, together with interest from 06/22/2005 at the rate of \$10.11 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

  
By: /s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES OR LOTS OF GROUND SITUATE IN COOPER TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

THE FIRST THEREOF: BEGINNING AT THE COMMON CORNER OF THIS LOT AND LOT #43 AT THE TOWNSHIP ROAD; THENCE NORTH EIGHTY-FIVE DEGREES FORTY-NINE MINUTES WEST (N 85 DEGREES 49 MINUTES W) FIVE HUNDRED FORTY (540 FEET) FEET TO A POST; THENCE BY LANDS OF THE FORMER MARTHA E. SNYDER ESTATE TEN DEGREES FORTY-FIVE MINUTES EAST (10 DEGREE 45 MINUTES E) THREE HUNDRED SIXTY-FOUR (364 FEET) FEET TO A POST; THENCE BY LANDS OF (FORMER) MARTHA E. SNYDER ESTATE NORTH EIGHTY-ONE DEGREES FORTY-FIVE MINUTES EAST (N 81 DEGREE 45 MINUTES E) FIVE HUNDRED THIRTY-TWO AND EIGHT TENTHS (532.8 FEET) FEET TO POST AT TOWNSHIP ROAD; THENCE BY SAID ROAD SOUTH FIVE DEGREES FIFTY-THREE MINUTES WEST (S 5 DEGREES 53 MINUTES W) FOUR HUNDRED EIGHTY-THREE AND FIVE TENTHS (483.5 FEET) FEET TO POST AND PLACE OF BEGINNING. CONTAINING FIVE (5) ACRES AND BEING LOT # 105 IN THE FORMER MARTHA E. SNYDER PLOT OF LOTS IN COOPER TOWNSHIP.

BEING NO. 750 BIRCH STREET

**VERIFICATION**

SUMMER WINEGARDNER hereby states that he/she is ASSISTANT SECRETARY of CHASE

HOME FINANCE LLC SUCCESSOR BY MERGER WITH CHASE MANHATTAN

MORTGAGE CORPORATION mortgage servicing agent for Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief.

The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read "Summer Winegardner", written over a horizontal line.

SUMMER WINEGARDNER  
ASSISTANT SECRETARY

DATE: \_\_\_\_\_

6/20/15

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff

: COURT OF COMMON PLEAS  
:  
: CIVIL DIVISION  
:  
: CLEARFIELD County

vs.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON

Defendants

:  
: No. 05-906-CD  
:  
:  
:

**PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE**

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP  
By: Francis S. Hallinan  
FRANCIS S. HALLINAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
DANIEL G. SCHMIEG, ESQUIRE  
Attorneys for Plaintiff

Date: July 13, 2005

/lxh, Svc Dept.  
File# 99439

FILED <sup>cl</sup>  
m13:1861  
JUL 21 2005  
William A. Shaw  
Prothonotary/Clerk of Courts  
Any pd 7.00  
2 Compl. Reinstated  
to Shff

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

DOCKET # 100583  
NO: 05-906-CD  
SERVICE # 1 OF 2  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC  
vs.  
DEFENDANT: CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON

**SHERIFF RETURN**

NOW, July 11, 2005 AT 10:47 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON CHARLOTTE M. LUNDQUIST DEFENDANT AT 750 BIRCH ST., LANSE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO CHARLOTTE M. LUNDQUIST, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: SNYDER /

**FILED**  
d/2:33  
AUG 03 2005

William A. Shaw  
Prothonotary/Clerk of Courts

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

Service # 2 of 2 Services

Sheriff Docket # **100583**

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC

Case # 05-906-CD

vs.

CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON

**SHERIFF RETURNS**

NOW August 02, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO RONDA L. DAVIDSON, DEFENDANT. New:131 W.South St.,Mahanoy City,Pa.(570-773-3823).

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100583  
NO: 05-906-CD  
SERVICES 2  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC  
vs.  
DEFENDANT: CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON

SHERIFF RETURN

RETURN COSTS

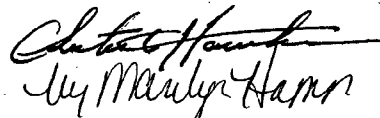
Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	435150	20.00
SHERIFF HAWKINS	PHELAN	435191	55.40

Sworn to Before Me This

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

\_\_\_\_\_

So Answers,



Chester A. Hawkins  
Sheriff

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
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ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff

v.

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 05-906-CD

CLEARFIELD COUNTY

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

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

Defendants

JUN 23 2005

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE** Attest.

*William L. Brown*  
Prothonotary/  
Clerk of Courts

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Notice to Defend:  
David S. Meholic, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record

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MCLEAN, VA 22102

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3415 VISION DRIVE  
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
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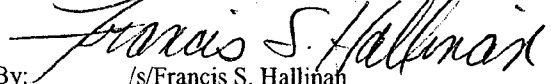
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7. The attorney's fees set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.
10. Plaintiff hereby releases CARL R. LUNDQUIST, from liability for the debt secured by the mortgage.

11. By virtue of the death of CARL R. LUNDQUIST, on 12/16/01, Defendant CHARLOTTE M. LUNDQUIST became sole owner of the mortgage premised as surviving tenant by the entireties, By deed dated 8/31/04, CHARLOTTE M. LUNDQUIST, widow, deeded the property to CHARLOTTE M. LUNDQUIST, WIDOW and RHONDA L. DAVIDSON, recorded 9/01/04 Instrument No. 2004414379.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 57,658.93, together with interest from 06/22/2005 at the rate of \$10.11 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

  
By: /s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES OR LOTS OF GROUND SITUATE IN COOPER TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

THE FIRST THEREOF: BEGINNING AT THE COMMON CORNER OF THIS LOT AND LOT #43 AT THE TOWNSHIP ROAD; THENCE NORTH EIGHTY-FIVE DEGREES FORTY-NINE MINUTES WEST (N 85 DEGREES 49 MINUTES W) FIVE HUNDRED FORTY (540 FEET) FEET TO A POST; THENCE BY LANDS OF THE FORMER MARTHA E. SNYDER ESTATE TEN DEGREES FORTY-FIVE MINUTES EAST (10 DEGREE 45 MINUTES E) THREE HUNDRED SIXTY-FOUR (364 FEET) FEET TO A POST; THENCE BY LANDS OF (FORMER) MARTHA E. SNYDER ESTATE NORTH EIGHTY-ONE DEGREES FORTY-FIVE MINUTES EAST (N 81 DEGREE 45 MINUTES E) FIVE HUNDRED THIRTY-TWO AND EIGHT TENTHS (532.8 FEET) FEET TO POST AT TOWNSHIP ROAD; THENCE BY SAID ROAD SOUTH FIVE DEGREES FIFTY-THREE MINUTES WEST (S 5 DEGREES 53 MINUTES W) FOUR HUNDRED EIGHTY-THREE AND FIVE TENTHS (483.5 FEET) FEET TO POST AND PLACE OF BEGINNING. CONTAINING FIVE (5) ACRES AND BEING LOT # 105 IN THE FORMER MARTHA E. SNYDER PLOT OF LOTS IN COOPER TOWNSHIP.

BEING NO. 750 BIRCH STREET

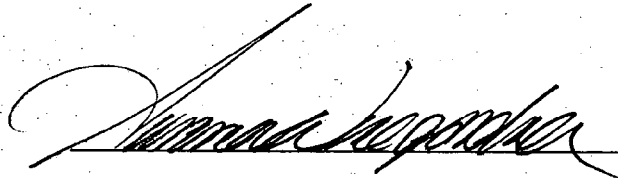
**VERIFICATION**

SUMMER WINEGARDNER hereby states that he/she is ASSISTANT SECRETARY of CHASE

HOME FINANCE LLC SUCCESSOR BY MERGER WITH CHASE MANHATTAN

MORTGAGE CORPORATION mortgage servicing agent for Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief.

The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'Summer Winegardner', is written over a horizontal line.

SUMMER WINEGARDNER  
ASSISTANT SECRETARY

DATE: 6/20/15

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.

Plaintiff

vs.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON

Defendants

: COURT OF COMMON PLEAS

: CIVIL DIVISION

: CLEARFIELD County

: No. 05-906-CD

**PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE**

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP

By:

*Francis S. Hallinan*  
FRANCIS S. HALLINAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
DANIEL G. SCHMIEG, ESQUIRE  
Attorneys for Plaintiff

Date: August 22, 2005

/ccp, Svc Dept.  
File# 99439

**FILED** Any pd. 7:00  
m/11:16/05 No cc  
AUG 25 2005 1 Compl. Reinstated  
William A. Shaw to Shaw  
Prothonotary/Clerk of Courts

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

Service # 1 of 1 Services

Sheriff Docket # **100660**

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC

Case # 05-906-CD

vs.

CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON

## SHERIFF RETURNS

NOW September 19, 2005 RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED" AS TO RONDA L. DAVIDSON, DEFENDANT. NEVER RECEIVED OUR ADVANCE COST

SERVED BY: /

**FILED**  
09/19/05  
OCT 10 2005

William A. Shaw  
Prothonotary/Clerk of Courts

## Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	Phelan	453666	10.00
SHERIFF HAWKINS	u	453666	9.00

Sworn to Before me This

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

So Answers,

  
Chester A. Hawkins  
Sheriff

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 05-906-CD

CLEARFIELD COUNTY

v.

Plaintiff

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

Defendants

FILED  
COPY  
JUN 23 2005  
William A. Shaw  
Prothonotary/Clerk of Courts

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**NOTICE**

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ATTORNEY FILE COPY  
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Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982  
7-21-05 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.  
Deputy Prothonotary

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MCLEAN, VA 22102

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

Plaintiff

NO.

v.

CLEARFIELD COUNTY

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

Defendants

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**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL THE END OF THE THIRTY (30) DAY PERIOD FOLLOWING FIRST CONTACT WITH YOU BEFORE SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH THE LAW PROVIDES THAT YOUR ANSWER TO THIS COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.**

1. Plaintiff is

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff, is or will be, the owner of legal title to the mortgage that is the subject of this action, and nominee for the entity indicated below, which is the owner of the entire beneficial interest in the mortgage:

CHASE HOME FINANCE LLC  
3415 VISION DRIVE  
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 02/20/2004 mortgagor(s) 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, in Mortgage Instrument No: 200403309.
4. The premises subject to said mortgage is described as attached.
5. 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 failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$52,735.44
Interest	2,982.45
05/01/2004 through 06/22/2005 (Per Diem \$10.11)	
Attorney's Fees	1,250.00
Cumulative Late Charges	141.04
02/20/2004 to 06/22/2005	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 57,658.93
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>

**TOTAL** \$ 57,658.93

7. 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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.
10. Plaintiff hereby releases CARL R. LUNDQUIST, from liability for the debt secured by the mortgage.

11. By virtue of the death of CARL R. LUNDQUIST, on 12/16/01, Defendant CHARLOTTE M. LUNDQUIST became sole owner of the mortgage premised as surviving tenant by the entireties, By deed dated 8/31/04, CHARLOTTE M. LUNDQUIST, widow, deeded the property to CHARLOTTE M. LUNDQUIST, WIDOW and RHONDA L. DAVIDSON, recorded 9/01/04 Instrument No. 2004414379.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 57,658.93, together with interest from 06/22/2005 at the rate of \$10.11 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By: 

/s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES OR LOTS-OF GROUND SITUATE IN COOPER TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

THE FIRST THEREOF: BEGINNING AT THE COMMON CORNER OF THIS LOT AND LOT #43 AT THE TOWNSHIP ROAD; THENCE NORTH EIGHTY-FIVE DEGREES FORTY-NINE MINUTES WEST (N 85 DEGREES 49 MINUTES W) FIVE HUNDRED FORTY (540 FEET) FEET TO A POST; THENCE BY LANDS OF THE FORMER MARTHA E. SNYDER ESTATE TEN DEGREES FORTY-FIVE MINUTES EAST (10 DEGREE 45 MINUTES E) THREE HUNDRED SIXTY-FOUR (364 FEET) FEET TO A POST; THENCE BY LANDS OF (FORMER) MARTHA E. SNYDER ESTATE NORTH EIGHTY-ONE DEGREES FORTY-FIVE MINUTES EAST (N 81 DEGREE 45 MINUTES E) FIVE HUNDRED THIRTY-TWO AND EIGHT TENTHS (532.8 FEET) FEET TO POST AT TOWNSHIP ROAD; THENCE BY SAID ROAD SOUTH FIVE DEGREES FIFTY-THREE MINUTES WEST (S 5 DEGREES 53 MINUTES W) FOUR HUNDRED EIGHTY-THREE AND FIVE TENTHS (483.5 FEET) FEET TO POST AND PLACE OF BEGINNING. CONTAINING FIVE (5) ACRES AND BEING LOT # 105 IN THE FORMER MARTHA E. SNYDER PLOT OF LOTS IN COOPER TOWNSHIP.

BEING NO. 750 BIRCH STREET

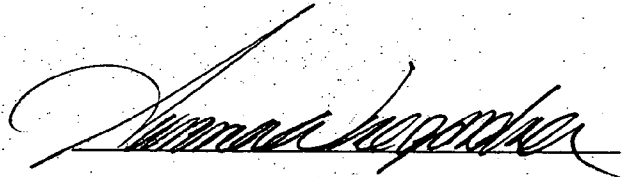
**VERIFICATION**

SUMMER WINEGARDNER hereby states that he/she is ASSISTANT SECRETARY of CHASE

HOME FINANCE LLC SUCCESSOR BY MERGER WITH CHASE MANHATTAN

MORTGAGE CORPORATION mortgage servicing agent for Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief.

The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.



SUMMER WINEGARDNER  
ASSISTANT SECRETARY

DATE: 6/20/15

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ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
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8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 05-906-CD

CLEARFIELD COUNTY

Plaintiff

v.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

Defendants

FILED  
COPY  
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8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff

v.

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO.

CLEARFIELD COUNTY

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WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 57,658.93, together with interest from 06/22/2005 at the rate of \$10.11 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By: 

/s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

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THE FIRST THEREOF: BEGINNING AT THE COMMON CORNER OF THIS LOT AND LOT #43 AT THE TOWNSHIP ROAD; THENCE NORTH EIGHTY-FIVE DEGREES FORTY-NINE MINUTES WEST (N 85 DEGREES 49 MINUTES W) FIVE HUNDRED FORTY (540 FEET) FEET TO A POST; THENCE BY LANDS OF THE FORMER MARTHA E. SNYDER ESTATE TEN DEGREES FORTY-FIVE MINUTES EAST (10 DEGREE 45 MINUTES E) THREE HUNDRED SIXTY-FOUR (364 FEET) FEET TO A POST; THENCE BY LANDS OF (FORMER) MARTHA E. SNYDER ESTATE NORTH EIGHTY-ONE DEGREES FORTY-FIVE MINUTES EAST (N 81 DEGREE 45 MINUTES E) FIVE HUNDRED THIRTY-TWO AND EIGHT TENTHS (532.8 FEET) FEET TO POST AT TOWNSHIP ROAD; THENCE BY SAID ROAD SOUTH FIVE DEGREES FIFTY-THREE MINUTES WEST (S 5 DEGREES 53 MINUTES W) FOUR HUNDRED EIGHTY-THREE AND FIVE TENTHS (483.5 FEET) FEET TO POST AND PLACE OF BEGINNING. CONTAINING FIVE (5) ACRES AND BEING LOT # 105 IN THE FORMER MARTHA E. SNYDER PLOT OF LOTS IN COOPER TOWNSHIP.

BEING NO. 750 BIRCH STREET

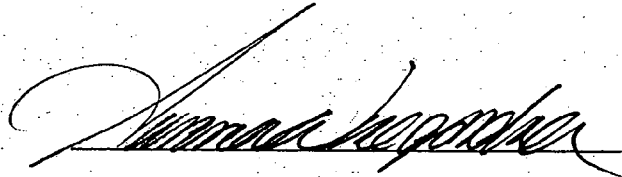
**VERIFICATION**

SUMMER WINEGARDNER hereby states that he/she is ASSISTANT SECRETARY of CHASE

HOME FINANCE LLC SUCCESSOR BY MERGER WITH CHASE MANHATTAN

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SUMMER WINEGARDNER  
ASSISTANT SECRETARY

DATE: 6/20/15

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PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.

Plaintiff

vs.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON

Defendants

: COURT OF COMMON PLEAS

:

: CIVIL DIVISION

:

: CLEARFIELD County

:

: No. 05-906-CD

:

:

:

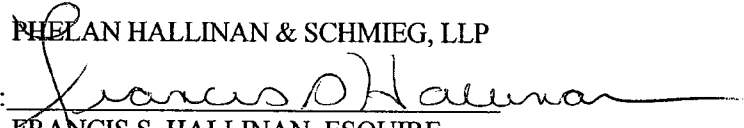
**PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE**

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP

By:

  
FRANCIS S. HALLINAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
DANIEL G. SCHMIEG, ESQUIRE  
Attorneys for Plaintiff

Date: October 17, 2005

/lxh, Svc Dept.  
File# 99439

**FILED** *Atty pd. 7.00*  
*m/2:06/101 Compl.*  
**OCT 18 2005** *Reinstated to*

William A. Shaw  
Prothonotary/Clerk of Courts

*Shff*  


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

Service # 1 of 1 Services

Sheriff Docket # **100762**

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.

Case # 05-906-CD

vs.

CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON

## SHERIFF RETURNS

NOW October 24, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO RONDA L. DAVIDSON, DEFENDANT. 750 BIRCH ST., LANSE, PA. "EMPTY" Home on Weekends.

SERVED BY: /

## Return Costs

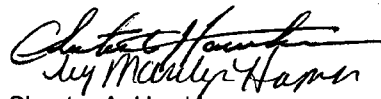
PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PHELAN	447406	10.00
SHERIFF HAWKINS	PHELAN	447450	24.40

Sworn to Before me This

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

\_\_\_\_\_

So Answers,



Chester A. Hawkins  
Sheriff

**FILED**

01/10/13/2015  
OCT 26 2005

William A. Shaw  
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 05-906-CD

CLEARFIELD COUNTY

Plaintiff

v.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

Defendants

FILED  
COPY  
JUN 23 2005  
William A. Shaw  
Prothonotary/Clerk of Courts

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

**NOTICE**

ATTORNEY FILE COPY  
PLEASE RETURN

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.

ATTORNEY FILE COPY  
PLEASE RETURN  
Pennsylvania Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

File #: 99439

8-25-05 Document  
Reinstated/Referred to Sheriff/Attorney  
for service.  
William A. Shaw  
Deputy Prothonotary

We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

---

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff

v.

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO.

CLEARFIELD COUNTY

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

Defendants

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

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Clearfield, PA 16830  
814-765-2641 x 5982

We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977), DEFENDANT(S) MAY DISPUTE THE VALIDITY OF THE DEBT OR ANY PORTION THEREOF. IF DEFENDANT(S) DO SO IN WRITING WITHIN THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING, COUNSEL FOR PLAINTIFF WILL OBTAIN AND PROVIDE DEFENDANT(S) WITH WRITTEN VERIFICATION THEREOF; OTHERWISE, THE DEBT WILL BE ASSUMED TO BE VALID. LIKEWISE, IF REQUESTED WITHIN THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING, COUNSEL FOR PLAINTIFF WILL SEND DEFENDANT(S) THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR, IF DIFFERENT FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL THE END OF THE THIRTY (30) DAY PERIOD FOLLOWING FIRST CONTACT WITH YOU BEFORE SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH THE LAW PROVIDES THAT YOUR ANSWER TO THIS COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.**

1. Plaintiff is

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff, is or will be, the owner of legal title to the mortgage that is the subject of this action, and nominee for the entity indicated below, which is the owner of the entire beneficial interest in the mortgage:

CHASE HOME FINANCE LLC  
3415 VISION DRIVE  
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 02/20/2004 mortgagor(s) 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, in Mortgage Instrument No: 200403309.
4. The premises subject to said mortgage is described as attached.
5. 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 failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$52,735.44
Interest	2,982.45
05/01/2004 through 06/22/2005 (Per Diem \$10.11)	
Attorney's Fees	1,250.00
Cumulative Late Charges	141.04
02/20/2004 to 06/22/2005	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 57,658.93
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	<u>\$ 0.00</u>

**TOTAL** **\$ 57,658.93**

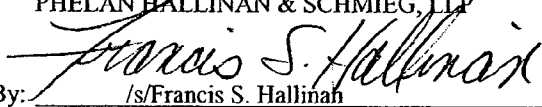
7. The attorney's fees set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.
10. Plaintiff hereby releases CARL R. LUNDQUIST, from liability for the debt secured by the mortgage.

11. By virtue of the death of CARL R. LUNDQUIST, on 12/16/01, Defendant CHARLOTTE M. LUNDQUIST became sole owner of the mortgage premised as surviving tenant by the entireties, By deed dated 8/31/04, CHARLOTTE M. LUNDQUIST, widow, deeded the property to CHARLOTTE M. LUNDQUIST, WIDOW and RHONDA L. DAVIDSON, recorded 9/01/04 Instrument No. 2004414379.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 57,658.93, together with interest from 06/22/2005 at the rate of \$10.11 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By:

  
/s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES OR LOTS OF GROUND SITUATE IN COOPER TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

THE FIRST THEREOF: BEGINNING AT THE COMMON CORNER OF THIS LOT AND LOT #43 AT THE TOWNSHIP ROAD; THENCE NORTH EIGHTY-FIVE DEGREES FORTY-NINE MINUTES WEST (N 85 DEGREES 49 MINUTES W) FIVE HUNDRED FORTY (540 FEET) FEET TO A POST; THENCE BY LANDS OF THE FORMER MARTHA E. SNYDER ESTATE TEN DEGREES FORTY-FIVE MINUTES EAST (10 DEGREE 45 MINUTES E) THREE HUNDRED SIXTY-FOUR (364 FEET) FEET TO A POST; THENCE BY LANDS OF (FORMER) MARTHA E. SNYDER ESTATE NORTH EIGHTY-ONE DEGREES FORTY-FIVE MINUTES EAST (N 81 DEGREE 45 MINUTES E) FIVE HUNDRED THIRTY-TWO AND EIGHT TENTHS (532.8 FEET) FEET TO POST AT TOWNSHIP ROAD; THENCE BY SAID ROAD SOUTH FIVE DEGREES FIFTY-THREE MINUTES WEST (S 5 DEGREES 53 MINUTES W) FOUR HUNDRED EIGHTY-THREE AND FIVE TENTHS (483.5 FEET) FEET TO POST AND PLACE OF BEGINNING. CONTAINING FIVE (5) ACRES AND BEING LOT # 105 IN THE FORMER MARTHA E. SNYDER PLOT OF LOTS IN COOPER TOWNSHIP.

BEING NO. 750 BIRCH STREET

**VERIFICATION**

SUMMER WINEGARDNER hereby states that he/she is ASSISTANT SECRETARY of CHASE HOME FINANCE LLC SUCCESSOR BY MERGER WITH CHASE MANHATTAN MORTGAGE CORPORATION mortgage servicing agent for Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.



SUMMER WINEGARDNER  
ASSISTANT SECRETARY

DATE: \_\_\_\_\_

6/20/15

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

: COURT OF COMMON PLEAS  
:  
: CIVIL DIVISION  
:  
: CLEARFIELD County

Plaintiff

vs.

CHARLOTTE M. LUNDQUIST  
CARL R. LUNDQUIST

:  
: No. 05-906-CD  
:  
:  
:

Defendants

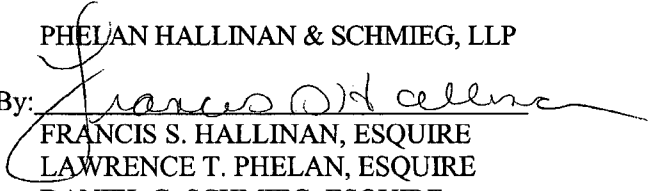
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TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP

By:

  
FRANCIS S. HALLINAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
DANIEL G. SCHMIEG, ESQUIRE  
Attorneys for Plaintiff

Date: January 18, 2006

/lxh, Svc Dept.  
File# 99439

**FILED** *no cc*  
*m/3:39/01*  
**JAN 23 2006** *Compl.*  
*Reinstated*  
William A. Shaw *to Atty*  
Prothonotary/Clerk of Courts *Atty pd. 7:00*  
*GP*

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

DOCKET # 100909  
NO: 05-906-CD  
SERVICE # 1 OF 1  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATIONS SYSTEMS INC

vs.

DEFENDANT: CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON

**SHERIFF RETURN**

---

NOW, October 25, 2005, SHERIFF OF SCHUYLKILL COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON RONDA L. DAVIDSON.

NOW, November 22, 2005 ATTEMPTED TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON RONDA L. DAVIDSON, DEFENDANT. THE RETURN OF SCHUYLKILL COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN MARKED "NOT FOUND".

**FILED**  
2/10/06  
FEB 10 2006

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100909  
NO: 05-906-CD  
SERVICES 1  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATIONS SYSTEMS INC  
vs.  
DEFENDANT: CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON

SHERIFF RETURN

RETURN COSTS

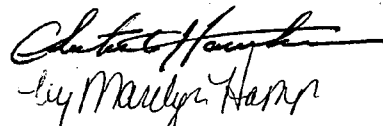
Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	458355	10.00
SHERIFF HAWKINS	PHELAN	458355	21.00
SCHUYLKILL CO.	PHELAN	458379	49.60

Sworn to Before Me This

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

\_\_\_\_\_

So Answers,



Chester A. Hawkins  
Sheriff

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

## \* \* A F F I D A V I T O F R E T U R N \* \*

DEPUTIZED FROM CLEARFIELD COUNTY

PLAINTIFF: MORTGAGE ELECTRONIC REG.  
V S

DEFENDANT: DAVIDSON, RONDA L

ATTORNEY: | HALLINAN, FRANCIS S  
|  
| ONE PENN CENTER PLAZA STE 1400  
| 1617 JOHN J KENNEDY BLVD  
| PHILADELPHIA, PA 19103

COURT NUMBER : 05-906-CD  
FILED BY : HALLINAN, FRANCIS S  
TYPE OF PAPER : COMP. IN MORTGAGE FORECLOSURE  
SERVING NUMBER : 41278  
PRO FILE DATE : 10/18/2005  
EXPIRATION : 11/17/2005  
SHF RECEIVED : 10/27/2005  
DEP RETURNED : 11/22/2005

## ( P E O P L E T O B E S E R V E D )

	NAME	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	DEPUTY
Service for	DAVIDSON, RONDA L	133 WEST SOUTH STREE		MAHANOEY CITY	PA	17984	BEREZWICK, K

## ( A T T E M P T S A T S E R V I C E )

SEQ	DATE	TIME	SERVED TO	ADDRESS 1	ADDRESS 2	CITY	ST	ZIP	MILES	COST
1	11/03/2005	10:34	[NOT FOUND]	133 WEST SOUTH STREE		MAHANOEY CITY	PA	17948	30	14.55
			* REMARKS : LEFT CARD							
2	11/16/2005	17:59	[NOT FOUND]	133 WEST SOUTH STREE		MAHANOEY CITY	PA	17948	30	14.55
			* REMARKS : NO ANSWER AT RESIDENCE							

Total : 29.10

Total Mileage Charge for all Services : 29.10

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T   O F   R E T U R N   \* \*

I hereby CERTIFY and RETURN a NOT FOUND because unable to locate the individual, company, corporation, etc, named above.

SWORN and subscribed before me this

22<sup>nd</sup>

SO ANSWERS

day of

NOV.

2005



(Deputy Sheriff)



(Prothonotary)



(Sheriff of Schuylkill County)

End - of - Return (X-404-2005)

SHERIFF'S DEPARTMENT  
OF SCHUYLKILL COUNTY  
SCHUYLKILL COUNTY COURT HOUSE  
POTTSVILLE, PENNSYLVANIA 17901  
(570) 622-5570

\* \* A F F I D A V I T O F R E T U R N \* \*

C O S T S I N F O R M A T I O N

DESCRIPTION	PAYMENTS	CHARGES	BALANCE
ADVANCE COSTS - SERVICE	150.00		150.00
R D & R		9.00	141.00
SERVICE		9.00	132.00
ADD SERVICE		0.00	132.00
MILEAGE		29.10	102.90
PROTHY FEE FOR SERVICE		2.50	100.40
REFUND		100.40	0.00

Advance Payment :	150.00
Cost of Service :	49.60
Refund Paid :	100.40

End - of - Return (05-906-CD)

ACCOUNT STATEMENT  
OFFICE OF THE SHERIFF  
OF SCHUYLKILL COUNTY

DATE : 11/22/2005

Case Ref : 05-906-CD

Service ID: 41278

Type : COMP. IN MORTGAGE FORECLOSURE

Filed By: FRANCIS S. HALLINAN, ESQ.

Address 1 : ONE PENN CENTER PLAZA STE 1400

Address 2 : 1617 JOHN J KENNEDY BLVD

City : PHILADELPHIA PA 19103

Advance Payment : 150.00

Cost of Service : 49.60

Refund : 100.40



CHESTER A. HAWKINS  
SHERIFF

# Sheriff's Office Clearfield County

COURTHOUSE  
1 NORTH SECOND STREET, SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830

79 41278  
OFFICE (814) 765-2641 EXT. 5986  
AFTER 4:00 P.M. (814) 765-1533  
FAX (814) 765-5915

ROBERT SNYDER  
CHIEF DEPUTY

MARILYN HAMM  
DEPT. CLERK

CYNTHIA AUGHENBAUGH  
OFFICE MANAGER

PETER F. SMITH  
SOLICITOR

## DEPUTATION

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

PAGE 100909

MORTGAGE ELECTRONIC REGISTRATIONS SYSTEMS INC

TERM & NO. 05-906-CD

COMPLAINT IN MORTGAGE FORECLOSURE

VS.

CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON

**SERVE BY: 11/16/05**

**MAKE REFUND PAYABLE TO PHELAN HALLINAN & SCHMIEG, LLP**

**SERVE:** RONDA L. DAVIDSON

**ADDRESS:** 133 W. SOUTH ST., MAHANOEY CITY, PA 17984

SCHUYLKILL COUNTY  
PENNSYLVANIA  
2005 OCT 27 P 1:04  
RECEIVED  
SHERIFF'S OFFICE

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby deputize the SHERIFF OF SCHUYLKILL COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, October 24, 2005.

RESPECTFULLY,

CHESTER A. HAWKINS,  
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

**SHERIFF'S RETURN OF SERVICE  
CLEARFIELD COUNTY**

**Plaintiff(s)**  
MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.

**NUMBER 05-906-CD**

**SHERIFF'S NUMBER**

**Defendant(s)**  
CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON

**COST MILEAGE**

**DISTRICT**

**Serve At**  
133 W. SOUTH STREET  
MAHANOEY CITY, PA 17984

☐ Summons ☒ Complaint  
☐ Other

**Special Instructions**

**TYPE OF ACTION**  
Mortgage Foreclosure

**TO BE COMPLETED BY SHERIFF**

Served and made known to \_\_\_\_\_, Defendant, on the \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_, at  
o'clock, \_\_m., at \_\_\_\_\_, County of \_\_\_\_\_, Commonwealth of Pennsylvania, in the manner  
described below:

- ☐ Defendant(s) personally served.
- ☐ Adult family member with whom said Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.
- ☐ Adult in charge of Defendant's residence who refused to give name or relationship.
- ☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).
- ☐ Agent or person in charge of Defendant's office or usual place of business.
- ☐ \_\_\_\_\_ and officer of said Defendant company.
- ☐ Other: \_\_\_\_\_

**SHERIFF**

By: \_\_\_\_\_, Deputy Sheriff

On the \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_, at \_\_\_\_\_ o'clock, \_\_m., Defendant not found because:  
☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant ☐ Other

**SHERIFF**

By: \_\_\_\_\_, Deputy Sheriff

**DEPUTIZED SERVICE**

Now, this \_\_\_\_\_ day of \_\_\_\_\_, 20 \_\_, I, Sheriff of \_\_\_\_\_ County, Pennsylvania do hereby deputize the Sheriff of  
County to serve this Complaint and make return thereof and according to law.

**SHERIFF**

By: \_\_\_\_\_, Deputy Sheriff.

**ATTORNEY FOR PLAINTIFF:**

Name Francis S. Hallinan, Esquire  
Id. No. 62695  
Address One Penn Center Plaza Suite 1400  
Philadelphia, PA 19103

**TO BE COMPLETED BY  
PROTHONOTARY**

ATTEST \_\_\_\_\_  
Pro Prothy \_\_\_\_\_  
Date \_\_\_\_\_

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff

v.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

Defendants

SCHUYLKILL COUNTY  
PENNSYLVANIA

2005 OCT 27 ATTORNEY FOR PLAINTIFF

RECEIVED  
SHERIFF'S OFFICE  
COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 05-906-CD

CLEARFIELD COUNTY

10-18-05 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

FILED  
COPY  
JUN 23 2005  
William A. Shaw  
Prothonotary/Clerk of Courts

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**  
**NOTICE**  
**ATTORNEY FILE COPY**  
**PLEASE RETURN**

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.

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Pennsylvania Lawyer Referral Service  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
David S. Meholic, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

We hereby certify the  
within to be a true and  
correct copy of the  
original filed of record

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**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL THE END OF THE THIRTY (30) DAY PERIOD FOLLOWING FIRST CONTACT WITH YOU BEFORE SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH THE LAW PROVIDES THAT YOUR ANSWER TO THIS COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.**

1. Plaintiff is

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff, is or will be, the owner of legal title to the mortgage that is the subject of this action, and nominee for the entity indicated below, which is the owner of the entire beneficial interest in the mortgage:

CHASE HOME FINANCE LLC  
3415 VISION DRIVE  
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 02/20/2004 mortgagor(s) 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, in Mortgage Instrument No: 200403309.
4. The premises subject to said mortgage is described as attached.
5. 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 failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

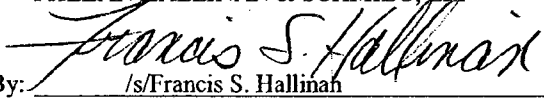
Principal Balance	\$52,735.44
Interest	2,982.45
05/01/2004 through 06/22/2005 (Per Diem \$10.11)	
Attorney's Fees	1,250.00
Cumulative Late Charges	141.04
02/20/2004 to 06/22/2005	
Cost of Suit and Title Search	\$ 550.00
Subtotal	\$ 57,658.93
Escrow	
Credit	0.00
Deficit	0.00
Subtotal	\$ 0.00
<b>TOTAL</b>	<b>\$ 57,658.93</b>

7. 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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.
10. Plaintiff hereby releases CARL R. LUNDQUIST, from liability for the debt secured by the mortgage.

11. By virtue of the death of CARL R. LUNDQUIST, on 12/16/01, Defendant CHARLOTTE M. LUNDQUIST became sole owner of the mortgage premised as surviving tenant by the entireties, By deed dated 8/31/04, CHARLOTTE M. LUNDQUIST, widow, deeded the property to CHARLOTTE M. LUNDQUIST, WIDOW and RHONDA L. DAVIDSON, recorded 9/01/04 Instrument No. 2004414379.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 57,658.93, together with interest from 06/22/2005 at the rate of \$10.11 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

  
By: /s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES OR LOTS OF GROUND SITUATE IN COOPER TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

THE FIRST THEREOF: BEGINNING AT THE COMMON CORNER OF THIS LOT AND LOT #43 AT THE TOWNSHIP ROAD; THENCE NORTH EIGHTY-FIVE DEGREES FORTY-NINE MINUTES WEST (N 85 DEGREES 49 MINUTES W) FIVE HUNDRED FORTY (540 FEET) FEET TO A POST; THENCE BY LANDS OF THE FORMER MARTHA E. SNYDER ESTATE TEN DEGREES FORTY-FIVE MINUTES EAST (10 DEGREE 45 MINUTES E) THREE HUNDRED SIXTY-FOUR (364 FEET) FEET TO A POST; THENCE BY LANDS OF (FORMER) MARTHA E. SNYDER ESTATE NORTH EIGHTY-ONE DEGREES FORTY-FIVE MINUTES EAST (N 81 DEGREE 45 MINUTES E) FIVE HUNDRED THIRTY-TWO AND EIGHT TENTHS (532.8 FEET) FEET TO POST AT TOWNSHIP ROAD; THENCE BY SAID ROAD SOUTH FIVE DEGREES FIFTY-THREE MINUTES WEST (S 5 DEGREES 53 MINUTES W) FOUR HUNDRED EIGHTY-THREE AND FIVE TENTHS (483.5 FEET) FEET TO POST AND PLACE OF BEGINNING. CONTAINING FIVE (5) ACRES AND BEING LOT # 105 IN THE FORMER MARTHA E. SNYDER PLOT OF LOTS IN COOPER TOWNSHIP.

BEING NO. 750 BIRCH STREET

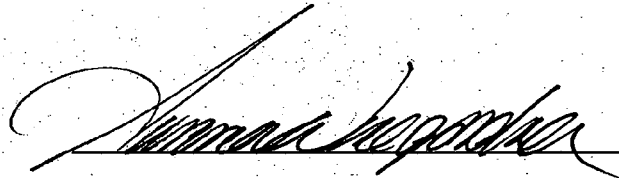
**VERIFICATION**

SUMMER WINEGARDNER hereby states that he/she is ASSISTANT SECRETARY of CHASE

HOME FINANCE LLC SUCCESSOR BY MERGER WITH CHASE MANHATTAN

MORTGAGE CORPORATION mortgage servicing agent for Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief.

The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'Summer Winegardner', is written over a horizontal line.

SUMMER WINEGARDNER  
ASSISTANT SECRETARY

DATE: 6/20/15

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

: COURT OF COMMON PLEAS  
:  
: CIVIL DIVISION  
:  
: CLEARFIELD County

Plaintiff

vs.

CHARLOTTE M. LUNDQUIST  
CARL R. LUNDQUIST

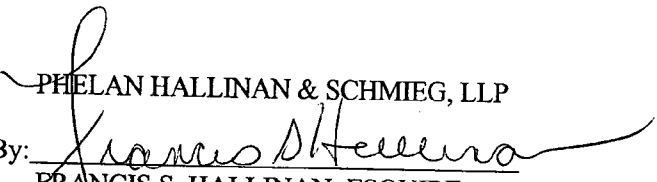
:  
: No. 05-906-CD  
:  
:  
:

Defendants

**PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE**

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP  
By:   
FRANCIS S. HALLINAN, ESQUIRE  
LAWRENCE T. PHELAN, ESQUIRE  
DANIEL G. SCHMIEG, ESQUIRE  
Attorneys for Plaintiff

Date: January 18, 2006

/lxh, Svc Dept.  
File# 99439

FILED No ce  
312:4261 Atty pd 7.00  
FEB 13 2006  
William A. Shaw  
Prothonotary/Clerk of Courts  
1 Compl. Reinstate to Atty  
(GK)

Phelan Hallinan & Schmieg, L.L.P.  
By: Daniel G. Schmieg, Esquire No. 62205  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Attorney for Plaintiff

Mortgage Electronic Registration Systems, Inc.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
CLEARFIELD COUNTY  
NO. 05-906-CD

vs.

Charlotte M. Lunquist  
Ronda L. Davidson

**MEMORANDUM OF LAW**

Pa. R.C.P. 430(a) specifically provides:

- (a) If service cannot be made under the applicable rule, the plaintiff may move the Court for a special order directing the method of service. The motion shall be accompanied by an affidavit stating the nature and extent of the investigation, which has been made to determine the whereabouts of the defendant and the reasons why service cannot be made.

Note: A Sheriff's return of "Not Found" or the fact that a Defendant has moved without leaving a new forwarding address is insufficient evidence of concealment. Gonzales vs. Polis, 238 Pa. Super. 362, 357 A.2d 580 (1976). "Notice of intended adoption mailed to last known address requires a good faith effort to discover the correct address." Adoption of Walker, 468 Pa. 165, 360 A.2d 603 (1976).

An illustration of good faith effort to locate the defendant includes (1) inquiries of postal authorities including inquiries pursuant to the Freedom of Information Act, 39 C.F.R. Part 265, (2) inquiries of relatives neighbors, friends and employers of the Defendant and (3) examinations of local telephone directories, voter registration records, local tax records, and motor vehicle records.

As indicated by the attached Sheriff's Return of Service, marked as Exhibit "B" and "C" and Plaintiff's Affidavit of No Service, attached hereto and marked as Exhibit "D", the Sheriff has been unable to serve the Complaint. A good faith effort to discover the whereabouts of the Defendant has been made as evidenced by the attached Affidavit of Reasonable Investigation, marked Exhibit "E".

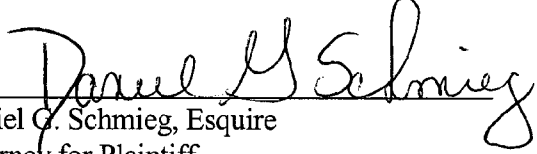
RECEIVED

FEB 13 2006

CLERK OF COURT  
OF CLEARFIELD COUNTY

**WHEREFORE**, Plaintiff respectfully requests this Honorable Court enter an Order pursuant to Pa.R.C.P. 430 directing service of the Complaint by first class mail and certified mail.

Respectfully submitted,  
Phelan Hallinan & Schmieg, L.L.P.

By:   
Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Date: February 9, 2006

IN THE COURT OF COMMON PLEAS  
CLEARFIELD COUNTY, PENNSYLVANIA

FILED  
10/9:49/06  
FEB 16 2006  
William A. Shaw  
Prothonotary/Clerk of Courts  
Schmieg  
CA

Mortgage Electronic Registration  
Systems, Inc.

vs.

CIVIL DIVISION  
NO. 05-906-CD

Charlotte M. Lunquist  
Ronda L. Davidson

ORDER

AND NOW, this 14<sup>th</sup> day of February, 2006, upon

consideration of Plaintiff's Motion for Service Pursuant to Special Order of Court, it is hereby

**ORDERED** and **DECREED** that said Motion is **GRANTED**.

It is further **ORDERED** and **DECREED** that Plaintiff may obtain service of the  
Complaint and all future pleadings on the above captioned Defendant, Ronda L. Davidson by:

1. First class mail to Ronda L. Davidson, at the last known addresses, 131 W. South Street, Mahanoy City, PA 17948 and 133 W. South Street, Mahanoy City, PA 17948 and the mortgaged premises located at 750 Birch Street, Lanse, PA 16849 ; and
2. Certified mail to Ronda L. Davidson, at the last known addresses, 131 W. South Street, Mahanoy City, PA 17948 and 133 W. South Street, Mahanoy City, PA 17948 and the mortgaged premises located at 750 Birch Street, Lanse, PA 16849.

BY THE COURT.

*Frederick J. Zimmerman*

J.

Phelan Hallinan & Schmieg, L.L.P.  
By: Daniel G. Schmieg, Esquire No. 62205  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

**FILED** *WCC*  
*m 12:41 PM*  
**FEB 13 2006** *(6P)*  
William A. Shaw  
Prothonotary/Clerk of Courts

Attorney for Plaintiff

Mortgage Electronic Registration  
Systems, Inc.

COURT OF COMMON PLEAS

vs.

CIVIL DIVISION

Charlotte M. Lunquist  
Ronda L. Davidson

CLEARFIELD COUNTY

NO. 05-906-CD

**MOTION FOR SERVICE PURSUANT TO**  
**SPECIAL ORDER OF COURT**

Plaintiff, by its counsel, Phelan Hallinan & Schmieg, L.L.P., moves this Honorable Court for an Order directing service of the Complaint upon the above-captioned Defendant, Ronda L. Davidson, by first class mail and certified mail to the last known addresses, 131 W. South Street, Mahanoy City, PA 17948 and 133 W. South Street, Mahanoy City, PA 17948 and the mortgaged premises, 750 Birch Street, Lanse, PA 16849, and in support thereof avers the following:

1. Plaintiff, by and through its counsel, initiated the above referenced Complaint in Mortgage Foreclosure on June 23, 2005. As indicated by the copy of said complaint attached hereto as Exhibit "A".

2. Attempts to serve the Defendant Ronda L. Davidson, personally with Complaint have been unsuccessful. The Sheriff of Clearfield County attempted to serve the Defendant at the mortgaged premises, 750 Birch Street, Lanse, PA 16849. As indicated by the Sheriff's Return of Service attached hereto as Exhibit "B", the property is empty and the Defendant usually stops by on the weekends.

3. The Sheriff of Clearfield County also Deputized the Sheriff of Schuylkill County for service at 131 W. South Street, Mahanoy City, PA 17948. As indicated by the Sheriff's Return of Service attached hereto as Exhibit "C", the Defendant was not found.

4. Lastly, the Sheriff of Clearfield County, Deputized the Sheriff of Schuylkill County for service at 133 W. South Street, Mahanoy City, PA 17948. Plaintiff is unable to append a copy of the Return of Service as a result of a backlog in completing the Affidavit at the Sheriff's Office. Plaintiff's Affidavit of Service is attached hereto and marked as Exhibit "D".

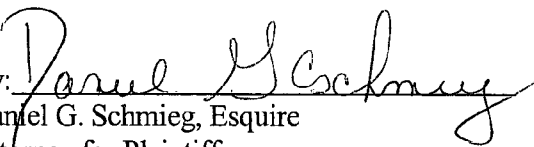
5. Pursuant to Pa.R.C.P. 430, Plaintiff has made a good faith effort to locate the Defendant. An Affidavit of Reasonable Investigation setting forth the specific inquiries made and the results is attached hereto as Exhibit "E".

6. Plaintiff has reviewed its internal records and has not been contacted by the Defendant as of February 9, 2006 to bring loan current.

7. Plaintiff submits that it has made a good faith effort to locate the Defendant but has been unable to do so.

**WHEREFORE**, Plaintiff respectfully requests this Honorable Court enter an Order pursuant to Pa.R.C.P. 430 directing service of the Complaint by first class mail and certified mail.

Respectfully submitted,  
Phelan Hallinan & Schmieg, L.L.P.

By:   
Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Date: February 9, 2006



PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff

v.

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 05-906-CD

CLEARFIELD COUNTY

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

Defendants

**FILED**  
**COPY**  
JUN 23 2005  
William A. Shaw  
Prothonotary/Clerk of Courts

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**  
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Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

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within to be a true and  
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MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

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CHASE HOME FINANCE LLC  
3415 VISION DRIVE  
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

who is/are the mortgagor(s) and real owner(s) of the property hereinafter described.

3. On 02/20/2004 mortgagor(s) 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, in Mortgage Instrument No: 200403309.
4. The premises subject to said mortgage is described as attached.
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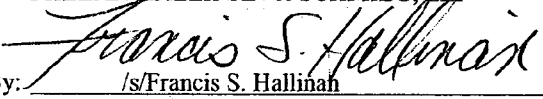
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<b>TOTAL</b>	<b>\$ 57,658.93</b>

7. 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.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
9. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.
10. Plaintiff hereby releases CARL R. LUNDQUIST, from liability for the debt secured by the mortgage.

11. By virtue of the death of CARL R. LUNDQUIST, on 12/16/01, Defendant CHARLOTTE M. LUNDQUIST became sole owner of the mortgage premised as surviving tenant by the entireties, By deed dated 8/31/04, CHARLOTTE M. LUNDQUIST, widow, deeded the property to CHARLOTTE M. LUNDQUIST, WIDOW and RHONDA L. DAVIDSON, recorded 9/01/04 Instrument No. 2004414379.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 57,658.93, together with interest from 06/22/2005 at the rate of \$10.11 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

  
By: /s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES OR LOTS OF GROUND SITUATE IN COOPER TOWNSHIP, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

THE FIRST THEREOF: BEGINNING AT THE COMMON CORNER OF THIS LOT AND LOT #43 AT THE TOWNSHIP ROAD; THENCE NORTH EIGHTY-FIVE DEGREES FORTY-NINE MINUTES WEST (N 85 DEGREES 49 MINUTES W) FIVE HUNDRED FORTY (540 FEET) FEET TO A POST; THENCE BY LANDS OF THE FORMER MARTHA E. SNYDER ESTATE TEN DEGREES FORTY-FIVE MINUTES EAST (10 DEGREE 45 MINUTES E) THREE HUNDRED SIXTY-FOUR (364 FEET) FEET TO A POST; THENCE BY LANDS OF (FORMER) MARTHA E. SNYDER ESTATE NORTH EIGHTY-ONE DEGREES FORTY-FIVE MINUTES EAST (N 81 DEGREE 45 MINUTES E) FIVE HUNDRED THIRTY-TWO AND EIGHT TENTHS (532.8 FEET) FEET TO POST AT TOWNSHIP ROAD; THENCE BY SAID ROAD SOUTH FIVE DEGREES FIFTY-THREE MINUTES WEST (S 5 DEGREES 53 MINUTES W) FOUR HUNDRED EIGHTY-THREE AND FIVE TENTHS (483.5 FEET) FEET TO POST AND PLACE OF BEGINNING. CONTAINING FIVE (5) ACRES AND BEING LOT # 105 IN THE FORMER MARTHA E. SNYDER PLOT OF LOTS IN COOPER TOWNSHIP.

BEING NO. 750 BIRCH STREET

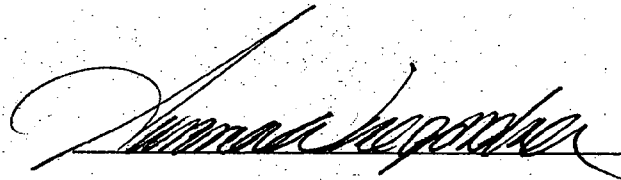
**VERIFICATION**

SUMMER WINEGARDNER hereby states that he/she is ASSISTANT SECRETARY of CHASE

HOME FINANCE LLC SUCCESSOR BY MERGER WITH CHASE MANHATTAN

MORTGAGE CORPORATION mortgage servicing agent for Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief.

The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read 'Summer Winegardner', is written over a horizontal line.

SUMMER WINEGARDNER  
ASSISTANT SECRETARY

DATE:

6/20/5



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

Service # 1 of 1 Services

Sheriff Docket # **100762**

MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.

Case # 05-906-CD

vs.

CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON

**COPY**

**SHERIFF RETURNS**

NOW October 24, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO RONDA L. DAVIDSON, DEFENDANT. 750 BIRCH ST., LANSE, PA. "EMPTY" Home on Weekends.

SERVED BY: /

**Return Costs**

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PHELAN	447406	10.00
SHERIFF HAWKINS	PHELAN	447450	24.40

Sworn to Before me This

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

So Answers,



Chester A. Hawkins  
Sheriff



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

Service # 2 of 2 Services

Sheriff Docket # **100583**

**MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC**

Case # **05-906-CD**

vs.

**CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON**

**SHERIFF RETURNS**

NOW August 02, 2005 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO RONDA L. DAVIDSON, DEFENDANT. New:131 W.South St.,Mahanoy City,Pa.(570-773-3823).

SERVED BY: /



Phelan Hallinan & Schmieg, L.L.P.  
By: Daniel G. Schmieg, Esquire No. 62205  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Attorney for Plaintiff

Mortgage Electronic  
Registration Systems, Inc.

:

COURT OF COMMON PLEAS

:

:

CIVIL DIVISION

Vs.

:

CLEARFIELD COUNTY

Charlotte M. Lundquist  
Ronda L. Davidson

:

NO. 05-906-CD

**AFFIDAVIT OF SERVICE**

Plaintiff's Counsel, Phelan Hallinan & Schmieg, LLP, does hereby swear and subscribe that it contacted the Sheriff's Office of Clearfield County on July 13, 2005 and was advised that the Sheriff served Defendant, Charolette M. Lundquist, at 750 Birch Street, Lanse, PA 16849 on July 11, 2005. The Office of the Sheriff also indicated that the Defendant, Ronda L. Davidson, was not served at any of the three possible addresses, 131 W. South Street, Mahanoy City, PA 17948, 133 W. South Street, Mahanoy City, PA 17948 and 750 Birch Street, Lanse, PA 16849. The Sheriff of Clearfield County did provide returns of Service for the mortgaged premises and 131 W. South Street, Mahanoy City, PA 17948. However Plaintiff, to date has not received a Return of Service for 133 W. South Street, Mahanoy City, PA 17948. On November 10, 2005, November 17, 2005, November 18, 2005, November 22, 2005, December 1, 2005, December 8, 2005 and December 27, 2005, the Plaintiff, by its Counsel, called the Sheriff's Office inquiring if a Return of Service was complete. The Sheriff's Office advised the Plaintiff's

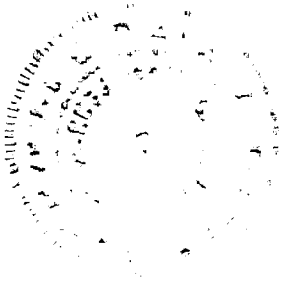
Counsel that they are behind with getting the returns typed up and out the door. However, they did confirm on all occasions that the Sheriff was unsuccessful in his/her attempts to serve the Defendant at 133 W. South Street, Mahanoy City, PA 17948.

Respectfully submitted,  
Phelan Hallinan & Schmieg, L.L.P.

By: Daniel G. Schmieg  
Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Sworn to and subscribed before me on this 29<sup>th</sup> day of December 2005

Diana M. Deeter  
Notary Public





**FULL SPECTRUM LEGAL SERVICES, INC.  
AFFIDAVIT OF GOOD FAITH INVESTIGATION  
FNMA SKIP TRACE**

File Number: 99439

Attorney Firm: **Phelan, Hallinan & Schmieg, LLP**

Subject: Ronda L. Davidson

Current Address: 133 West South Street, Mahanoy City, PA 17948

Property Address: 750 Birch Street, Lanse, PA 16849

Mailing Address: 133 West South Street, Mahanoy City, PA 17948

**I, Brendan Booth, being duly sworn according to law, do hereby depose and state as follows, I have conducted an investigation into the whereabouts of the above-noted individual(s) and have discovered the following:**

**I. CREDIT INFORMATION**

**A. SOCIAL SECURITY NUMBER**

Our search verified the following information to be true and correct  
Ronda L. Davidson - not available

**B. EMPLOYMENT SEARCH**

Ronda L. Davidson - A review of the credit reporting agencies provided no employment information.

**C. INQUIRY OF CREDITORS**

Our inquiry of creditors indicated that Ronda L. Davidson reside(s) at: 133 West South Street, Mahanoy City, PA 17948.

**II. INQUIRY OF TELEPHONE COMPANY**

**A. DIRECTORY ASSISTANCE SEARCH**

On 10/10/05 our office contacted directory assistance, which could not provide an address or phone number for Ronda L. Davidson, however did provide a listing for a James W. Davidson at: 131 West South Street, Mahanoy City, PA 17948. On 10/10/05 our office made a telephone call to James W. Davidson's phone number, (570) 773-1492, and received the following information: spoke to the mother-in-law of Ronda L. Davidson who confirmed that Ronda L. Davidson reside(s) at: 133 West South Street, Mahanoy City, PA 17948.

**III. ADDRESS INQUIRY**

**A. NATIONAL ADDRESS UPDATE**

On 10/10/05 we reviewed the National Address database and found the following information: Ronda L. Davidson- 133 West South Street, Mahanoy City, PA 17948.

**B. ADDITIONAL ACTIVE MAILING ADDRESSES**

Per our inquiry of creditors, the following is a possible mailing address: no addresses on file.

IV. DRIVERS LICENSE INFORMATION

A. MOTOR VEHICLE & DMV OFFICE

Per the PA Department of Motor Vehicles, we were unable to obtain address information on Ronda L. Davidson.

V. OTHER INQUIRIES

A. DEATH RECORDS

As of 10/10/05 Vital Records and all public databases have no death record on file for Ronda L. Davidson.

B. COUNTY VOTER REGISTRATION

The county voter registration was unable to confirm a registration for Ronda L. Davidson residing at: last registered address.

VI. ADDITIONAL INFORMATION OF SUBJECT

A. DATE OF BIRTH

Ronda L. Davidson - not available

B. A.K.A.

Ronda L. Maines

**\* All accessible public databases have been checked and cross-referenced for the above named individual(s).**

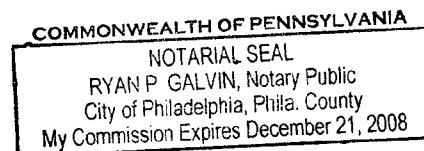

**\* Please be advised all database information indicates the subject resides at the current address.**

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing states made by me are willfully false, I am subject to punishment.

I herby verify that the statements made herein are true and correct to the best of my knowledge, information and belief and that this affidavit of investigation is made subject to the penalties of 18 Pa C.S. Sec. 4904 relating to unsworn falsification to authorities.



AFFIANT - Brendan Booth  
Full Spectrum Legal Services, Inc.



Sworn to and subscribed before me this 11<sup>th</sup> day of October 2005.

The above information is obtained from available public records  
and we are only liable for the cost of the affidavit.

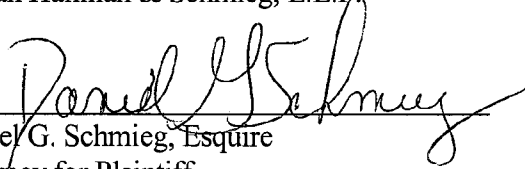
JEM

## VERIFICATION

Daniel G. Schmieg, Esquire, hereby states that he is the Attorney for the Plaintiff in this action, that he is authorized to make this Affidavit, and that the statements made in the foregoing MOTION FOR SERVICE PURSUANT TO SPECIAL ORDER OF COURT are true and correct to the best of his knowledge, information and belief.

The undersigned understands that the statements made are subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

Respectfully submitted,  
Phelan Hallinan & Schmieg, L.L.P.

By:   
Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Date: February 9, 2006

Phelan Hallinan & Schmieg, L.L.P.  
By: Daniel G. Schmieg, Esquire No. 62205  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Attorney for Plaintiff

Mortgage Electronic  
Registration Systems, Inc.

COURT OF COMMON PLEAS

Vs.

CIVIL DIVISION

Charlotte M. Lunquist  
Ronda L. Davidson

CLEARFIELD COUNTY

NO. 05-906-CD

**CERTIFICATION OF SERVICE**

I, Daniel G. Schmieg, Esquire, hereby certify that a copy of the foregoing Motion for Service Pursuant to Special Order of Court, Memorandum of Law, Proposed Order and attached exhibits have been sent to the individual as indicated below by first class mail, postage prepaid, on the date listed below.

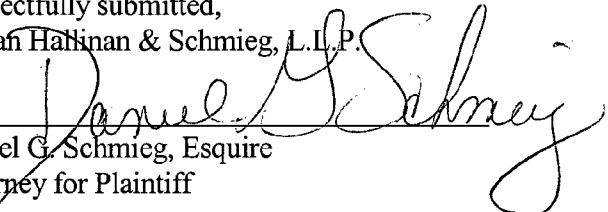
Ronda L. Davidson  
750 Birch Street  
Lanese, PA 17948

131 W. South Street  
Mahanoy City, PA 16781

133 W. South Street  
Mahanoy City, PA 16781

The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Respectfully submitted,  
Phelan Hallinan & Schmieg, L.L.P.

By:   
Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Date: February 9, 2006

PHELAN HALLINAN & SCHMIEG LLP  
By: Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205  
One Penn Center Plaza, Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
Plaintiff

: COURT OF COMMON PLEAS

vs.

: CIVIL DIVISION

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
Defendant(s)

: CLEARFIELD COUNTY

: NO. 05-906-CD

**FILED** No cc  
MAR 02 2006

William A. Shaw  
Prothonotary/Clerk of Courts

**AFFIDAVIT OF SERVICE OF COMPLAINT  
BY MAIL PURSUANT TO COURT ORDER**

I hereby certify that a true and correct copy of the Civil Action Complaint in Mortgage Foreclosure in the above captioned matter was sent by regular and certified mail, return receipt requested, to the following persons **RONDA L. DAVIDSON at 750 BIRCH STRET, LANSE, PA 16849, 131 W. SOUTH STREET, MAHANOEY CITY, PA 16781 AND 133 W. SOUTH STREET, MAHANOEY CITY, PA 16781** on **FEBRUARY 28, 2006**, in accordance with the Order of Court dated **FEBRUARY 14, 2006**. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: February 28, 2006

  
FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

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

MORTGAGE.ELECTRONIC  
REGISTRATION.SYSTEMS, INC.

vs.

CHARLOTTE.M..LUNDQUIST  
RONDA.L.DAVIDSON

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

No. 05-906-CD Term 2005...

PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)

To the Director of the Office of Judicial Support

Issue writ of execution in the above matter:

Amount Due

\$60,782.92

Interest from 4/27/06 to Sale  
Per diem \$9.99

\$\_\_\_\_\_.

Add'l Costs

\$6,701.71

**Prothonotary costs** \$160.00

*Daniel M. Schmitz*  
Attorney for the Plaintiff(s)

Note: Please attach description of Property.

**FILED**

MAY 12 2006

W/ 2:45 PM  
William A. Shaw  
Prothonotary/Clerk of Courts

1 CENT TO SHFF

W/ 6 W/ 6

No. 05-906-CD..... Term 20 05 A.D.

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

63  
13  
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MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS, INC.

vs.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON

PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)

Filed:

*Daniel M. Lehm*.....  
Attorney for Plaintiff(s)

Address: CHARLOTTE M. LUNDQUIST RONDA L. DAVIDSON  
750 BIRCH STREET 750 BIRCH STREET  
LANSE, PA 16849 LANSE, PA 16849

### DESCRIPTION

ALL THOSE two certain pieces or lots of ground situate in Cooper Township, Clearfield County, Pennsylvania, bounded and described as follows:

THE FIRST THEREOF: BEGINNING at the common corner of this lot and Lot #43 at the Township Road; thence North Eight-five degrees Forty-nine minutes West (N 85° 49' W) Five Hundred Forty (540') feet to a post; thence by lands of the former Martha E. Snyder Estate Ten degrees Forty-five minutes East (10° 45' E) Three Hundred Sixty-four (364') feet to a post; thence by lands of (former) Martha E. Snyder Estate North Eight-one degrees Forty-five minutes East (N 81° 45' E) Five Hundred Thirty-two and Eight tenths (532.8') feet to post at Township Road; thence by said Road South Five degrees Fifty-three minutes West (S 5° 53' W) Four Hundred Eighty-three and Five tenths (483.5') feet to post and place of beginning. CONTAINING Five (5) acres and being Lot #105 in the former Martha E. Snyder plot of lots in Cooper Township.

EXCEPTING AND RESERVING the following two lots:

(a) Conveyed to Raymond and Elmira Sankey - Beginning at a stake in right of way line of Township Road No. T-720 and the Northeast corner of Lot No. 43, property of Hilma T. Lindquist; thence along said Lot North Eighty-five degrees Forty-nine minutes West (N 85° 49' W) a distance of One Hundred Twenty-five (125') feet to a stake; thence still by lands of Hilma T. Lindquist, Lot No. 105 from which this is a part, North Five degrees Fifty-three minutes East (N 5° 53' E) a distance of One Hundred (100') feet to a stake; thence still by same South Eighty-five degrees Forty-nine minutes East (S 85° 49' E) a distance of One Hundred Twenty-five (125') feet to a stake in right of way line of Township Road No. T-720; thence along said right of way line South Five degrees Fifty-three minutes West (S 5° 53' W) a distance of One Hundred (100') feet to a stake, the place of beginning. CONTAINING 0.287 acres.

(b) Conveyed to James and Odessa Stafford - Beginning at a stake on right of way line of Township Road T-720; thence North Eighty-five degrees Forty-nine minutes West (N 85° 49' W) a distance of One Hundred Twenty-five (125') feet to a stake; thence North Five degrees Fifty-three minutes East (N 5° 53' E) a distance of Sixty (60') feet to a stake; thence South Eighty-five degrees Forty-nine minutes East (S 85° 49' E) a distance of One Hundred Twenty-five (125') feet; thence South Five degrees Fifty-three minutes West (S 5° 53' W) a distance of Sixty (60') feet to place of beginning. Containing 0.172 acres.

THE SECOND THEREOF: BEGINNING at a post at the Township Road; thence South Three degrees Thirty minutes West (S 3° 30' W) Two Hundred Fifty (250') feet to post at corner of Lot No. 44; thence by said Lot North Eighty-five degrees West (N 85° W) Six Hundred Ninety-nine (699') feet to a post at other lands of Martha E. Snyder Estate; thence by said lands North Three degrees Thirty minutes East (N 3° 30' E) Two Hundred Fifty (250') feet to a post; thence still by other lands of Martha E. Snyder Estate South Eighty-five degrees East (S 85° E) Six Hundred Ninety-nine (699') feet to the post and place of beginning. Containing Four (4) acres, and being known as Lot No. 43 in the Martha E. Snyder plot of lots in Cooper Township.

EXCEPTING AND RESERVING from The First Thereof and The Second Thereof, above, all the stone, coal, fire clay, oil, gas and other minerals.

Map #110-S9-50.

TITLE TO SAID PREMISES IS VESTED IN Carl R. Lundquist and Charlotte M. Lundquist, his wife by Deed from Carl R. Lundquist dated 7/24/1990 and recorded 7/25/1990, in Deed Book Volume 1354 Page 406.

Premises : 750 Birch Street, Lanse, PA 16849

Tax Parcel No. 110-S9-50

CA

IN THE COURT OF COMMON PLEAS  
CLEARFIELD COUNTY, PENNSYLVANIA

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

Mortgage Electronic Registration  
Systems, Inc.

FEB 16 2006

vs.

CIVIL DIVISION  
NO. 05-906-CD

Attest.

*W. B. B.*  
Prothonotary/  
Clerk of Courts

Charlotte M. Lunquist  
Ronda L. Davidson

ORDER

AND NOW, this 14<sup>th</sup> day of February, 2006, upon <sup>6 WA</sup>

consideration of Plaintiff's Motion for Service Pursuant to Special Order of Court, it is hereby

**ORDERED** and **DECREED** that said Motion is **GRANTED**.

It is further **ORDERED** and **DECREED** that Plaintiff may obtain service of the  
Complaint and all future pleadings on the above captioned Defendant, Ronda L. Davidson by:

1. First class mail to Ronda L. Davidson, at the last known addresses, 131 W. South Street, Mahanoy City, PA 17948 and 133 W. South Street, Mahanoy City, PA 17948 and the mortgaged premises located at 750 Birch Street, Lanse, PA 16849 ; and
2. Certified mail to Ronda L. Davidson, at the last known addresses, 131 W. South Street, Mahanoy City, PA 17948 and 133 W. South Street, Mahanoy City, PA 17948 and the mortgaged premises located at 750 Birch Street, Lanse, PA 16849.

BY THE COURT

*Frederick J. Zimmerman*

J.

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

MORTGAGE.ELECTRONIC  
REGISTRATION.SYSTEMS, INC.

vs.

CHARLOTTE M. LUNDQUIST

RONDA L. DAVIDSON

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

No. .... Term 20

No. 05-906-CD Term 20 05

No. .... Term 20

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 property  
(specifically described property below):

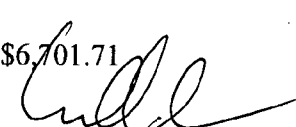
PREMISES: 750 BIRCH STREET, LANSE, PA 16849  
(See Legal Description attached)

Amount Due \$60,782.92

Interest from 4/27/06 to Sale \$-----  
per diem \$9.99

Total \$----- Prothonotary costs \$160.00

Add'l Costs \$6,701.71

  
\_\_\_\_\_  
(Clerk) Office of the Prothy Support, Common Pleas Court  
of CLEARFIELD County, Penna.

Dated 5-12-06  
(SEAL)

No. 05-906-CD..... Term 20 05 A.D.

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

MORTGAGE ELECTRONIC REGISTRATION  
SYSTEMS, INC.

vs.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON

---

WRIT OF EXECUTION  
(Mortgage Foreclosure)

---

Costs

Real Debt                      \$60,782.92

Int. from 4/27/06

To Date of Sale (\$9.99 per diem)

Costs

Prothy Pd.

Sheriff

David M. Schmidt  
Attorney for Plaintiff(s)

Address: CHARLOTTE M. LUNDQUIST    RONDA L. DAVIDSON  
750 BIRCH STREET                      750 BIRCH STREET  
LANSE, PA 16849                      LANSE, PA 16849

### DESCRIPTION

ALL THOSE two certain pieces or lots of ground situate in Cooper Township, Clearfield County, Pennsylvania, bounded and described as follows:

THE FIRST THEREOF: BEGINNING at the common corner of this lot and Lot #43 at the Township Road; thence North Eight-five degrees Forty-nine minutes West (N 85° 49' W) Five Hundred Forty (540') feet to a post; thence by lands of the former Martha E. Snyder Estate Ten degrees Forty-five minutes East (10° 45' E) Three Hundred Sixty-four (364') feet to a post; thence by lands of (former) Martha E. Snyder Estate North Eight-one degrees Forty-five minutes East (N 81° 45' E) Five Hundred Thirty-two and Eight tenths (532.8') feet to post at Township Road; thence by said Road South Five degrees Fifty-three minutes West (S 5° 53' W) Four Hundred Eighty-three and Five tenths (483.5') feet to post and place of beginning. CONTAINING Five (5) acres and being Lot #105 in the former Martha E. Snyder plot of lots in Cooper Township.

EXCEPTING AND RESERVING the following two lots:

(a) Conveyed to Raymond and Elmira Sankey - Beginning at a stake in right of way line of Township Road No. T-720 and the Northeast corner of Lot No. 43, property of Hilma T. Lindquist; thence along said Lot North Eighty-five degrees Forty-nine minutes West (N 85° 49' W) a distance of One Hundred Twenty-five (125') feet to a stake; thence still by lands of Hilma T. Lindquist, Lot No. 105 from which this is a part, North Five degrees Fifty-three minutes East (N 5° 53' E) a distance of One Hundred (100') feet to a stake; thence still by same South Eighty-five degrees Forty-nine minutes East (S 85° 49' E) a distance of One Hundred Twenty-five (125') feet to a stake in right of way line of Township Road No. T-720; thence along said right of way line South Five degrees Fifty-three minutes West (S 5° 53' W) a distance of One Hundred (100') feet to a stake, the place of beginning. CONTAINING 0.287 acres.

(b) Conveyed to James and Odessa Stafford - Beginning at a stake on right of way line of Township Road T-720; thence North Eighty-five degrees Forty-nine minutes West (N 85° 49' W) a distance of One Hundred Twenty-five (125') feet to a stake; thence North Five degrees Fifty-three minutes East (N 5° 53' E) a distance of Sixty (60') feet to a stake; thence South Eighty-five degrees Forty-nine minutes East (S 85° 49' E) a distance of One Hundred Twenty-five (125') feet; thence South Five degrees Fifty-three minutes West (S 5° 53' W) a distance of Sixty (60') feet to place of beginning. Containing 0.172 acres.

THE SECOND THEREOF: BEGINNING at a post at the Township Road; thence South Three degrees Thirty minutes West (S 3° 30' W) Two Hundred Fifty (250') feet to post at corner of Lot No. 44; thence by said Lot North Eighty-five degrees West (N 85° W) Six Hundred Ninety-nine (699') feet to a post at other lands of Martha E. Snyder Estate; thence by said lands North Three degrees Thirty minutes East (N 3° 30' E) Two Hundred Fifty (250') feet to a post; thence still by other lands of Martha E. Snyder Estate South Eighty-five degrees East (S 85° E) Six Hundred Ninety-nine (699') feet to the post and place of beginning. Containing Four (4) acres, and being known as Lot No. 43 in the Martha E. Snyder plot of lots in Cooper Township.

EXCEPTING AND RESERVING from The First Thereof and The Second Thereof, above, all the stone, coal, fire clay, oil, gas and other minerals.


Map #110-S9-50.


TITLE TO SAID PREMISES IS VESTED IN Carl R. Lundquist and Charlotte M. Lundquist, his wife by Deed from Carl R. Lundquist dated 7/24/1990 and recorded 7/25/1990, in Deed Book Volume 1354 Page 406.

Premises : 750 Birch Street, Lanse, PA 16849

Tax Parcel No. 110-S9-50

**(215) 563-7000**

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

**None**

NAME	LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
------	---------------------------------------------------------------------------------------

**750 BIRCH STREET  
LANSE, PA 16849**

**CLEARFIELD COUNTY COURTHOUSE**  
**230 EAST MARKET STREET**  
**CLEARFIELD, PA 16830**


**DEPARTMENT OF WELFARE  
PO BOX 2675  
HARRISBURG, PA 17105**

6th Floor, Strawberry Square  
Dept. 280601  
Harrisburg, PA 17128

13<sup>th</sup> Floor, Suite 1300  
1001 Liberty Avenue  
Pittsburgh, PA 15222

P.O. Box 8486  
Willow Oak Building  
Harrisburg, PA 17105-8486

4/27/06  
Date

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS  
CLEARFIELD PENNSYLVANIA

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff,

v.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

Defendant(s).

:  
:  
: CLEARFIELD COUNTY  
: COURT OF COMMON PLEAS  
:  
: CIVIL DIVISION  
:  
: NO. 05-906-CD  
:  
:  
:  
:  
:  
:

Notice is given that a Judgment in the above captioned matter has been entered against you  
on April 29, 2006.

BY  DEPUTY

WILLIAM A. SHAW  
Prothonotary  
My Commission Expires  
1st Monday in Jan. 2010  
Clearfield Co., Clearfield, PA

If you have any questions concerning this matter, please contact:



DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff  
One Penn Center at Suburban Station, Suite 1400  
1617 John F. Kennedy Boulevard  
Philadelphia, PA 19103-1814  
(215) 563-7000

This firm is a debt collector attempting to collect a debt. Any information we obtain will be used for that purpose. If you have previously received a discharge in bankruptcy, this correspondence is not and should not be construed to be an attempt to collect a debt, but only enforcement of a lien against property.

PHELAN HALLINAN & SCHMIEG  
By: DANIEL G. SCHMIEG  
Identification No. 62205  
One Penn Center at Suburban Station - Suite 1400  
1617 John F. Kennedy Boulevard  
Philadelphia, PA 19103-1814 Attorney for Plaintiff  
(215) 563-7000

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.  
8201 GREENSBORO DRIVE, SUITE 350  
MCLEAN, VA 22102

Plaintiff,

v.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

Defendant(s).

PRAECIPE FOR IN REM JUDGMENT FOR FAILURE TO  
ANSWER AND ASSESSMENT OF DAMAGES

CLEARFIELD COUNTY  
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 05-906-CD

FILED

APR 28 2006

W/ 1:00/4  
William A. Shaw  
Prothonotary/Clerk of Courts


CERT TO DEPT'S  
w/ notice

TO THE OFFICE OF THE PROTHONOTARY:

Kindly enter an in rem judgment in favor of the Plaintiff and against **CHARLOTTE M. LUNDQUIST and RONDA L. DAVIDSON**, Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in the Complaint	\$ 57,658.93
Interest - 6/23/05 TO 4/27/06	\$3,123.99
TOTAL	<u>\$ 60,782.92</u>

I hereby certify that (1) the addresses of the Plaintiff and Defendant(s) are as shown above, and (2) notice has been given in accordance with Rule 237.1, copy attached.

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 4-29-06

  
PRO PROTHY

PHELAN HALLINAN AND SCHMIEG  
By: Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205  
One Penn Center Plaza, Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC REGISTRATION : COURT OF COMMON PLEAS  
SYSTEMS, INC.

Plaintiff : CIVIL DIVISION

Vs. : CLEARFIELD COUNTY

CHARLOTTE M. LUNDQUIST : NO. 05-906-CD  
RONDA L. DAVIDSON  
Defendants

TO: CHARLOTTE M. LUNDQUIST  
750 BIRCH STREET  
LANSE, PA 16849

FILE COPY

DATE OF NOTICE: MARCH 21, 2006

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

#### 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 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.

CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT  
ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
(814) 765-2641 x 5982

PENNSYLVANIA LAWYER REFERRAL  
SERVICE  
PENNSYLVANIA BAR ASSOCIATION  
100 SOUTH STREET  
P.O. BOX 186  
HARRISBURG, PA 17108  
800-692-7375

FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

PHELAN HALLINAN AND SCHMIEG  
By: Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205  
One Penn Center Plaza, Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC REGISTRATION : COURT OF COMMON PLEAS  
SYSTEMS, INC.

Plaintiff : CIVIL DIVISION

Vs. : CLEARFIELD COUNTY

CHARLOTTE M. LUNDQUIST : NO. 05-906-CD  
RONDA L. DAVIDSON  
Defendants

FILE COPY

TO: RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

DATE OF NOTICE: MARCH 21, 2006

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HARRISBURG, PA 17108  
800-692-7375

FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

PHELAN HALLINAN AND SCHMIEG  
By: Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205  
One Penn Center Plaza, Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC REGISTRATION : COURT OF COMMON PLEAS  
SYSTEMS, INC.

Plaintiff : CIVIL DIVISION

Vs. : CLEARFIELD COUNTY

CHARLOTTE M. LUNDQUIST : NO. 05-906-CD  
RONDA L. DAVIDSON  
Defendants

TO: RONDA L. DAVIDSON  
133 W SOUTH STREET  
MAHANOEY CITY, PA 17948

FILE COPY

DATE OF NOTICE: MARCH 21, 2006

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CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT  
ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
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100 SOUTH STREET  
P.O. BOX 186  
HARRISBURG, PA 17108  
800-692-7375

FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

PHELAN HALLINAN AND SCHMIEG  
By: Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205  
One Penn Center Plaza, Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

MORTGAGE ELECTRONIC REGISTRATION : COURT OF COMMON PLEAS  
SYSTEMS, INC.

Plaintiff : CIVIL DIVISION

Vs. : CLEARFIELD COUNTY

CHARLOTTE M. LUNDQUIST : NO. 05-906-CD  
RONDA L. DAVIDSON  
Defendants

TO: RONDA L. DAVIDSON  
131 W SOUTH STREET  
MAHANOEY CITY, PA 17948

FILE COPY

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CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT  
ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
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PENNSYLVANIA LAWYER REFERRAL  
SERVICE  
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100 SOUTH STREET  
P.O. BOX 186  
HARRISBURG, PA 17108  
800-692-7375

FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

**(215) 563-7000**

**CLEARFIELD COUNTY  
COURT OF COMMON PLEAS**

**CIVIL DIVISION**

**NO. 05-906-CD**

Daniel G. Schmieg  
DANIEL G. SCHMIEG, ESQUIRE

***PHELAN HALLINAN & SCHMIEG, LLP***

By Lawrence T. Phelan, Esquire, ID. No. 32227  
Francis S. Hallinan Esquire, ID No. 62695  
One Penn Center at Suburban Station  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Attorney for Plaintiff

---

**MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.**

**Plaintiff**

**vs.**

**Court of Common Pleas  
CLEARFIELD County  
No. 05-906-CD**

**CHARLOTTE M. LUNDQUIEST  
RONDA L. DAVIDSON**

**Defendant(s)**

---

**PRAECIPE TO SUBSTITUTE LEGAL DESCRIPTION**

TO THE PROTHONOTARY:

Kindly substitute the attached legal description for the legal description originally filed with the complaint in the instant matter.

06/29/08  
Date

Francis S. Hallinan  
Lawrence T. Phelan, Esquire  
Francis S. Hallinan, Esquire  
Attorneys for Plaintiff

PHS # 99439

**FILED** <sup>NO CC</sup>  
m 111433H  
JUL 03 2008

William A. Shaw  
Prothonotary/Clerk of Courts

### DESCRIPTION

ALL THOSE two certain pieces or lots of ground situate in Cooper Township, Clearfield County, Pennsylvania, bounded and described as follows:

THE FIRST THEREOF: BEGINNING at the common corner of this lot and Lot #43 at the Township Road; thence North Eight-five degrees Forty-nine minutes West (N 85° 49' W) Five Hundred Forty (540') feet to a post; thence by lands of the former Martha E. Snyder Estate Ten degrees Forty-five minutes East (10° 45' E) Three Hundred Sixty-four (364') feet to a post; thence by lands of (former) Martha E. Snyder Estate North Eight-one degrees Forty-five minutes East (N 81° 45' E) Five Hundred Thirty-two and Eight tenths (532.8') feet to post at Township Road; thence by said Road South Five degrees Fifty-three minutes West (S 5° 53' W) Four Hundred Eighty-three and Five tenths (483.5') feet to post and place of beginning. CONTAINING Five (5) acres and being Lot #105 in the former Martha E. Snyder plot of lots in Cooper Township.

EXCEPTING AND RESERVING the following two lots:

(a) Conveyed to Raymond and Elmira Sankey - Beginning at a stake in right of way line of Township Road No. T-720 and the Northeast corner of Lot No. 43, property of Hilma T. Lindquist; thence along said Lot North Eighty-five degrees Forty-nine minutes West (N 85° 49' W) a distance of One Hundred Twenty-five (125') feet to a stake; thence still by lands of Hilma T. Lindquist, Lot No. 105 from which this is a part, North Five degrees Fifty-three minutes East (N 5° 53' E) a distance of One Hundred (100') feet to a stake; thence still by same South Eighty-five degrees Forty-nine minutes East (S 85° 49' E) a distance of One Hundred Twenty-five (125') feet to a stake in right of way line of Township Road No. T-720; thence along said right of way line South Five degrees Fifty-three minutes West (S 5° 53' W) a distance of One Hundred (100') feet to a stake, the place of beginning. CONTAINING 0.287 acres.

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THE SECOND THEREOF: BEGINNING at a post at the Township Road; thence South Three degrees Thirty minutes West (S 3° 30' W) Two Hundred Fifty (250') feet to post at corner of Lot No. 44; thence by said Lot North Eighty-five degrees West (N 85° W) Six Hundred Ninety-nine (699') feet to a post at other lands of Martha E. Snyder Estate; thence by said lands North Three degrees Thirty minutes East (N 3° 30' E) Two Hundred Fifty (250') feet to a post; thence still by other lands of Martha E. Snyder Estate South Eighty-five degrees East (S 85° E) Six Hundred Ninety-nine (699') feet to the post and place of beginning. Containing Four (4) acres, and being known as Lot No. 43 in the Martha E. Snyder plot of lots in Cooper Township.

EXCEPTING AND RESERVING from The First Thereof and The Second Thereof, above, all the stone, coal, fire clay, oil, gas and other minerals.

Map #110-S9-50.

TITLE TO SAID PREMISES IS VESTED IN Carl R. Lundquist and Charlotte M. Lundquist, his wife by Deed from Carl R. Lundquist dated 7/24/1990 and recorded 7/25/1990, in Deed Book Volume 1354 Page 406.

Premises : 750 Birch Street, Lanse, PA 16849

Tax Parcel No. 110-S9-50

FILED *no cc*  
M11038761  
JUL 31 2006  
*um*

SALE DATE: AUGUST 4, 2006 William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION – LAW

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.

No.: 05-906-CD

vs.

CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON

**AFFIDAVIT PURSUANT TO RULE 3129.1  
AND RETURN OF SERVICE PURSUANT TO  
Pa. R.C.P. 405 OF NOTICE OF SALE**

Plaintiff in the above action sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at:

**750 BIRCH STREET, LANSE, PA 16849.**

As required by Pa. R.C.P. 3129.2(a) Notice of Sale has been given in the manner required by Pa. R.C.P. 3129.2(c) on each of the persons or parties named, at that address set forth on the attached Affidavit No. 2 (previously filed) and Amended Affidavit No. 2 on the date indicated, and a copy of the notice is attached as an Exhibit. A copy of the Certificate of Mailing (Form 3817) and/or Certified Mail Return Receipt stamped by the U.S. Postal Service is attached for each notice.

*Daniel Schmieg*  
\_\_\_\_\_  
DANIEL SCHMIEG, ESQUIRE  
Attorney for Plaintiff

July 28, 2006

.....

**NO. 05-906-CD**

**V.**

**Defendant(s).**

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

[illegible]

CIVIL DIVISION

**NO. 05-906-CD**

**v.**

⋮

**Defendant(s).**

None

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

NAME \_\_\_\_\_

LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)

**TENANT/OCCUPANT**

**750 BIRCH STREET  
LANSE, PA 16849**

**DOMESTIC  
RELATIONS  
CLEARFIELD  
COUNTY**

**CLEARFIELD COUNTY COURTHOUSE**  
**230 EAST MARKET STREET**  
**CLEARFIELD, PA 16830**

**COMMONWEALTH  
OF PENNSYLVANIA**

**DEPARTMENT OF WELFARE  
PO BOX 2675  
HARRISBURG, PA 17105**

**Commonwealth of Pennsylvania**  
**Bureau of Individual Tax**  
**Inheritance Tax Division**  
**Attention: John Murphy**

6th Floor, Strawberry Square  
Dept. 280601  
Harrisburg, PA 17128

Internal Revenue Service  
Federated Investors Tower

13<sup>th</sup> Floor, Suite 1300  
1001 Liberty Avenue  
Pittsburgh, PA 15222


Department of Public Welfare  
TPL Casualty Unit  
Estate Recovery Program

P.O. Box 8486  
Willow Oak Building  
Harrisburg, PA 17105-8486

I verify that the statements made in this Affidavit are true and correct to the best of my knowledge, information or belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. '4904 relating to unsworn falsification to authorities.

4/27/06

Date \_\_\_\_\_

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff

DATE: MAY 25, 2006

**MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.**

v.

**CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON**

**TO: ALL PARTIES IN INTEREST AND CLAIMANTS**

**NOTICE OF SHERIFF'S SALE OF REAL PROPERTY**

**OWNER(S): CHARLOTTE M. LUNDQUIST  
RONDA L. DAVIDSON**

**PROPERTY: 750 BIRCH STREET  
LANSE, PA 16849**

**Improvements: Residential Property**

**CLEARFIELD COUNTY**

**NO.: 05-906-CD**

**Judgment Amount: \$60,782.92**

The above-captioned property is scheduled to be sold at the **CLEARFIELD** Sheriff's Sale on **AUGUST 4, 2006** at **10:00 AM**, in CLEARFIELD County Courthouse, 1 North 2<sup>nd</sup> Street, Ste. 116, Clearfield, PA 16830.

Our records indicate that you may hold a mortgage, judgment, or other interest on the property, which may be extinguished by the sale. You may wish to attend the sale to protect your interests. If you have any questions regarding the type of lien or the effect of the Sheriff's Sale upon your lien, we urge you to **CONTACT YOUR OWN ATTORNEY**, as we are not permitted to give you legal advice.

The Sheriff will file a schedule of Distribution 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.

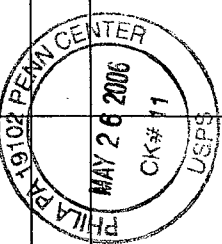
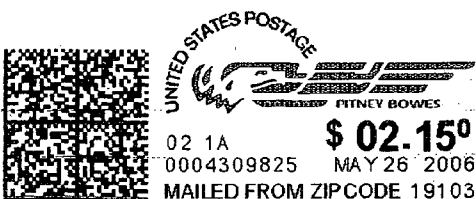
CQS

Name and Address of Sender



**CQS**  
**PHILAN HALLINAN & SCHMIEG**  
 One Penn Center at Suburban Station, Suite 1400  
 1617 John F. Kennedy Boulevard  
 Philadelphia, PA 19103-1814

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee
1		TENANT/OCCUPANT 750 BIRCH STREET LANSE, PA 16849		
2		DOMESTIC RELATIONS CLEARFIELD COUNTY CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830		
3		COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF WELFARE PO BOX 2675 HARRISBURG, PA 17105		
4		Commonwealth of Pennsylvania Bureau of Individual Tax 6th Floor, Strawberry Square Dept. 280601 Inheritance Tax Division Attention: John Murphy Harrisburg, PA 17128		
5		Internal Revenue Service Federated Investors Tower 13 <sup>th</sup> Floor, Suite 1300 1001 Liberty Avenue Pittsburgh, PA 15222		
6		Department of Public Welfare TPL Casualty Unit P.O. Box 8486 Willow Oak Building Estate Recovery Program Harrisburg, PA 17105-8486		
7		COMMONWEALTH OF PA BUREAU OF COMPLIANCE DEPT. #280946 HARRISBURG, PA 17128		
8				
12		Re: CHARLOTTE M. LUNDQUIST  KAZ TEAM 4 <b>99437</b>		
Total Number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional insurance. See Domestic Mail Manual R900, S913 and S921 for limitations of coverage.



***PHELAN HALLINAN & SCHMIEG, LLP***

Lawrence T. Phelan, Esq., Id. No. 32227

Francis S. Hallinan, Esq., Id. No. 62695

Daniel G. Schmieg, Esq., Id No. 62205

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

Mortgage Electronic Registration Systems, Inc.

ATTORNEY FOR PLAINTIFF

: Court of Common Pleas

: Civil Division

Plaintiff

vs.

: Clearfield County

Charlotte M. Lundquist

Ronda L. Davidson

: No. 05-906-CD

Defendant(s)

**PRAECIPE**

TO THE PROTHONOTARY:

\_\_\_\_\_ Please mark the above referenced case Discontinued and Ended without prejudice.

\_\_\_\_\_ Please mark the above referenced case Settled, Discontinued and Ended.

  X   Please mark Judgments satisfied and the Action settled, discontinued and ended.

\_\_\_\_\_ Please Vacate the judgment entered and mark the action discontinued and ended without prejudice.

\_\_\_\_\_ Please withdraw the complaint and mark the action discontinued and ended without prejudice.

Date: 10/9/06

Francis S. Hallinan

Francis S. Hallinan  
Attorney for Plaintiff

PHS # 99439

FILED  
OCT 23 2006  
William A. Shaw  
Prothonotary/Clerk of Courts  
disc issued  
HALLINAN

**PHELAN HALLINAN & SCHMIEG, LLP**

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard

Suite 1400

Philadelphia, PA 19103-1814

215-563-7000

Fax: 215-563-4491

victoria.snigareva@fedphe.com

Victoria Snigareva-- Ext. 1363  
Litigation Department

Representing Lenders in  
Pennsylvania and New Jersey\*

---

October 9, 2006

Office of the Prothonotary  
Clearfield County  
One North 2<sup>nd</sup> Street  
Clearfield, PA 16830

RE: Mortgage Electronic Registration Systems, Inc. vs.  
Charlotte M. Lundquist and Ronda L. Davidson  
Clearfield County, CCP, No. 05-906-CD

Dear Sir/Madam:

Enclosed for filing is Plaintiff's Praecipe. Please file the Praecipe and return a time-stamped copy of each in the enclosed self-addressed, stamped envelope.

Thank you for your assistance in this matter.

Very truly yours,



Victoria Snigareva, Legal Assistant  
encl.

cc: Robin Jean Foor, Esquire  
Ronda L. Davidson

\* Please be advised that this firm is a debt collector attempting to collect a debt. Any information received will be used for that purpose. If you have previously received a discharge in bankruptcy and this debt was not reaffirmed, this correspondence is not and should not be construed to be an attempt to collect a debt, but only enforcement of lien against property.

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

CERTIFICATE OF SATISFACTION OF JUDGMENT

No.: 2005-00906-CD

Mortgage Electronic Registration Systems, Inc.

Debt: \$

Vs.

Atty's Comm.:

Charlotte Lundquist  
Ronda L. Davidson

Interest From:

Cost: \$7.00

NOW, Monday, October 23, 2006 , directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 23rd day of October, A.D. 2006.



Prothonotary

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

**CIVIL DIVISION**

COPY

**Mortgage Electronic Registration Systems, Inc.**

**Vs.**

**No. 2005-00906-CD**

**Charlotte Lundquist**

**Ronda L. Davidson**

**CERTIFICATE OF DISCONTINUATION**

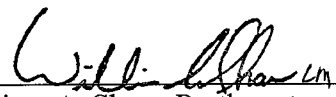
Commonwealth of PA  
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on October 23, 2006, marked:

Settled, discontinued and ended

Record costs in the sum of \$167.00 have been paid in full by Francis J. Hallinan Esq..

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 23rd day of October A.D. 2006.

  
\_\_\_\_\_  
William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20345  
NO: 05-906-CD

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.  
vs.  
DEFENDANT: CHARLOTTE M. LUNDDQUIST AND RONDA L. DAVIDSON

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 05/12/2006

LEVY TAKEN 05/22/2006 @ 11:54 AM

POSTED 05/22/2006 @ 11:54 AM

SALE HELD

SOLD TO

WRIT RETURNED 02/08/2007

DATE DEED FILED NOT SOLD

FILED  
01/11/8/2006  
FEB 08 2006

William A. Shaw  
Prothonotary/Clerk of Courts

DETAILS

05/22/2006 @ 11:54 AM SERVED CHARLOTTE M. LUNDQUIST

SERVED CHARLOTTE M. LUNDQUIST, DEFENDANT, AT HER RESIDENCE 750 BIRCH STREET, LANSE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CHARLOTTE M. LUNDQUIST

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.

05/24/2006 @ SERVED RONDA L. DAVIDSON

SERVED RONDA L. DAVIDSON, DEFENDANT, BY REG & CERT MAIL PER COURT ORDER TO 750 BIRCH STREET, LANSE, PA 16849 CERT #70050390000372351445. RETURNED TO SHERIFF'S OFFICE UNCLAIMED ON 5/30/06

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF THE LEVY.

05/26/2006 @ SERVED RONDA L. DAVIDSON

SERVED RONDA L. DAVIDSON, DEFENDANT, BY REG & CERT MAIL PER COURT ORDER TO 131 W. SOUTH STREET, MAHONY CITY, PENNSYLVANIA 17948 CERT #70050390000372351469. SIGNED FOR BY RONDA L. DAVIDSON

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, AND COPY OF THE LEVY.

05/26/2006 @ SERVED RONDA DAVIDSON

SERVED RONDA L. DAVIDSON, DEFENDANT, BY REG & CERT MAIL PER COURT ORDER TO 133 W. SOUTH STREET, MAHONY CITY, PENNSYLVANIA 17948 CERT #70050390000372351452 SIGNED FOR BY RONDA L. DAVIDSON

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, AND COPY OF THE LEVY.

@ SERVED

NOW, AUGUST 8, 2006 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED FOR AUGUST 4, 2006 TO OCTOBER 6, 2006.

@ SERVED

NOW OCTOBER 6, 2006 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO STAY THE SHERIFF SALE SCHEDULED FOR OCTOBER 6, 2006, THE DEFULT WAS CURED IN THE AMOUNT OF \$71,690.16

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20345  
NO: 05-906-CD

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.

VS.

DEFENDANT: CHARLOTTE M. LUNDDQUIST AND RONDA L. DAVIDSON

Execution REAL ESTATE

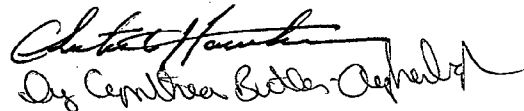
SHERIFF RETURN

---

SHERIFF HAWKINS \$1,676.78

SURCHARGE \$40.00 PAID BY ATTORNEY

So Answers,



Chester A. Hawkins  
Sheriff

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

MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.

vs.

CHARLOTTE M. LUNDQUIST

RONDA L. DAVIDSON

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

No. .... Term 20

No. 05-906-CD Term 20 05

No. .... Term 20

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 property  
(specifically described property below):

PREMISES: 750 BIRCH STREET, LANSE, PA 16849  
(See Legal Description attached)

Amount Due

\$60,782.92

Interest from 4/27/06 to Sale  
per diem \$9.99

\$-----

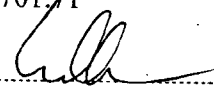
Total

\$-----

Add'l Costs

\$6,701.71

Prothonotary costs 160.00

  
\_\_\_\_\_  
(Clerk) Office of the Prothy Support, Common Pleas Court  
of CLEARFIELD County, Penna.

Dated 5-12-06  
(SEAL)

Received May 12, 2006 @ 3:15 P.M.  
Chester A. Hawke  
By Cynthia Butler Ayrhony

### DESCRIPTION

ALL THOSE two certain pieces or lots of ground situate in Cooper Township, Clearfield County, Pennsylvania, bounded and described as follows:

THE FIRST THEREOF: BEGINNING at the common corner of this lot and Lot #43 at the Township Road; thence North Eight-five degrees Forty-nine minutes West ( $N 85^{\circ} 49' W$ ) Five Hundred Forty (540') feet to a post; thence by lands of the former Martha E. Snyder Estate Ten degrees Forty-five minutes East ( $10^{\circ} 45' E$ ) Three Hundred Sixty-four (364') feet to a post; thence by lands of (former) Martha E. Snyder Estate North Eight-one degrees Forty-five minutes East ( $N 81^{\circ} 45' E$ ) Five Hundred Thirty-two and Eight tenths (532.8') feet to post at Township Road; thence by said Road South Five degrees Fifty-three minutes West ( $S 5^{\circ} 53' W$ ) Four Hundred Eighty-three and Five tenths (483.5') feet to post and place of beginning. CONTAINING Five (5) acres and being Lot #105 in the former Martha E. Snyder plot of lots in Cooper Township.

EXCEPTING AND RESERVING the following two lots:

(a) Conveyed to Raymond and Elmira Sankey - Beginning at a stake in right of way line of Township Road No. T-720 and the Northeast corner of Lot No. 43, property of Hilma T. Lindquist; thence along said Lot North Eighty-five degrees Forty-nine minutes West ( $N 85^{\circ} 49' W$ ) a distance of One Hundred Twenty-five (125') feet to a stake; thence still by lands of Hilma T. Lindquist, Lot No. 105 from which this is a part, North Five degrees Fifty-three minutes East ( $N 5^{\circ} 53' E$ ) a distance of One Hundred (100') feet to a stake; thence still by same South Eighty-five degrees Forty-nine minutes East ( $S 85^{\circ} 49' E$ ) a distance of One Hundred Twenty-five (125') feet to a stake in right of way line of Township Road No. T-720; thence along said right of way line South Five degrees Fifty-three minutes West ( $S 5^{\circ} 53' W$ ) a distance of One Hundred (100') feet to a stake, the place of beginning. CONTAINING 0.287 acres.

(b) Conveyed to James and Odessa Stafford - Beginning at a stake on right of way line of Township Road T-720; thence North Eighty-five degrees Forty-nine minutes West ( $N 85^{\circ} 49' W$ ) a distance of One Hundred Twenty-five (125') feet to a stake; thence North Five degrees Fifty-three minutes East ( $N 5^{\circ} 53' E$ ) a distance of Sixty (60') feet to a stake; thence South Eighty-five degrees Forty-nine minutes East ( $S 85^{\circ} 49' E$ ) a distance of One Hundred Twenty-five (125') feet; thence South Five degrees Fifty-three minutes West ( $S 5^{\circ} 53' W$ ) a distance of Sixty (60') feet to place of beginning. Containing 0.172 acres.

THE SECOND THEREOF: BEGINNING at a post at the Township Road; thence South Three degrees Thirty minutes West ( $S 3^{\circ} 30' W$ ) Two Hundred Fifty (250') feet to post at corner of Lot No. 44; thence by said Lot North Eighty-five degrees West ( $N 85^{\circ} W$ ) Six Hundred Ninety-nine (699') feet to a post at other lands of Martha E. Snyder Estate; thence by said lands North Three degrees Thirty minutes East ( $N 3^{\circ} 30' E$ ) Two Hundred Fifty (250') feet to a post; thence still by other lands of Martha E. Snyder Estate South Eighty-five degrees East ( $S 85^{\circ} E$ ) Six Hundred Ninety-nine (699') feet to the post and place of beginning. Containing Four (4) acres, and being known as Lot No. 43 in the Martha E. Snyder plot of lots in Cooper Township.

EXCEPTING AND RESERVING from The First Thereof and The Second Thereof, above, all the stone, coal, fire clay, oil, gas and other minerals.

Map #110-S9-50.

TITLE TO SAID PREMISES IS VESTED IN Carl R. Lunquist and Charlotte M. Lundquist, his wife by Deed from Carl R. Lundquist dated 7/24/1990 and recorded 7/25/1990, in Deed Book Volume 1354 Page 406.

Premises : 750 Birch Street, Lanse, PA 16849

Tax Parcel No. 110-S9-50

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME CHARLOTTE M. LUNDQUIST

NO. 05-906-CD

NOW, February 08, 2007, 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 , I exposed the within described real estate of Charlotte M. Lunddquist And Ronda L. Davidson 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	17.80
LEVY	15.00
MILEAGE	17.80
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	22.38
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	1,433.80
<b>TOTAL SHERIFF COSTS</b>	<b>\$1,676.78</b>

**DEED COSTS:**

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

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	60,782.92
INTEREST @ 9.9900	(7,316,955.7
FROM 04/27/2006 TO	
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	
<b>TOTAL DEBT AND INTEREST</b>	<b>(\$7,256,132.80)</b>

**COSTS:**

ADVERTISING	688.66
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	200.00
ACKNOWLEDGEMENT	
DEED COSTS	0.00
SHERIFF COSTS	1,676.78
LEGAL JOURNAL COSTS	180.00
PROTHONOTARY	160.00
MORTGAGE SEARCH	80.00
MUNICIPAL LIEN	
<b>TOTAL COSTS</b>	<b>\$2,985.44</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

CA

IN THE COURT OF COMMON PLEAS  
CLEARFIELD COUNTY, PENNSYLVANIA

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

Mortgage Electronic Registration  
Systems, Inc.

FEB 16 2006

vs.

CIVIL DIVISION  
NO. 05-906-CD

Attest

*W. B. B.*  
Prothonotary/  
Clerk of Courts

Charlotte M. Lunquist  
Ronda L. Davidson

ORDER

AND NOW, this 14<sup>th</sup> day of February, 2006, upon <sup>6 WA</sup>

consideration of Plaintiff's Motion for Service Pursuant to Special Order of Court, it is hereby  
**ORDERED** and **DECREED** that said Motion is **GRANTED**.

It is further **ORDERED** and **DECREED** that Plaintiff may obtain service of the  
Complaint and all future pleadings on the above captioned Defendant, Ronda L. Davidson by:

1. First class mail to Ronda L. Davidson, at the last known addresses, 131 W. South Street, Mahanoy City, PA 17948 and 133 W. South Street, Mahanoy City, PA 17948 and the mortgaged premises located at 750 Birch Street, Lanse, PA 16849 ; and
2. Certified mail to Ronda L. Davidson, at the last known addresses, 131 W. South Street, Mahanoy City, PA 17948 and 133 W. South Street, Mahanoy City, PA 17948 and the mortgaged premises located at 750 Birch Street, Lanse, PA 16849.

BY THE COURT

*Judith J. Zimmerman*

J.

7005 0390 0003 7235 1452

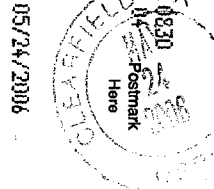
U.S. Postal Service<sup>TM</sup>CERTIFIED MAIL<sup>TM</sup> RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

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

OFFICIAL USE

Postage	\$ 10.63
Certified Fee	\$ 2.40
Return Receipt Fee (Endorsement Required)	\$ 1.85
Restricted Delivery Fee (Endorsement Required)	\$ 0.00
Total Postage & Fees	\$ 14.88



Sent To

Street Apt. No.  
or PO Box No.  
City, State, Zip+4

RONDA L. DAVIDSON  
133 W. SOUTH STREET  
MAHANAY CITY, PA 17948

PS Form 3800, June 2002

See Reverse for Instructions

## 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:

RONDA L. DAVIDSON  
133 W. SOUTH STREET  
MAHANAY CITY, PA 17948

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

*Ronda L. Davidson*

B. Received by (Printed Name)

C. Date of Delivery

5-26-06

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

## 3. Service Type

☒ Certified Mail ☐ Express Mail

☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes

## 2. Article Number

(Transfer from service label)

7005 0390 0003 7235 1452

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1-540

**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:

RONDA L. DAVIDSON  
131 W. SOUTH STREET  
MAHANOY CITY, PA 17948

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature *Ronda L. Davidson* Agent

B. Received by (Printed Name)

C. Date of Delivery  
05-26-06

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number 7005 0390 0003 7235 1469  
(Transfer from service label)

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

7005 0390 0003 7235 1469

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)

MAHANOY CITY, PA 17948

OFFICIAL USE

Postage	\$ 40.63
Certified Fee	\$2.40
Return Receipt Fee (Endorsement Required)	\$1.85
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 44.88

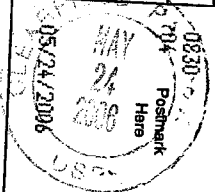
Sent To

Street, Apt. No.,  
or PO Box No.  
City, State, ZIP+4

RONDA L. DAVIDSON  
131 W. SOUTH STREET  
MAHANOY CITY, PA 17948

PS Form 3800, June 2002

See Reverse for Instructions



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

**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:

RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature ☒ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

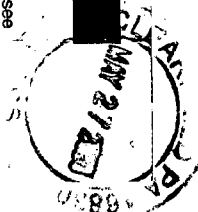
2. Article Number  
(Transfer from service label)

7005 0390 0003 7235 1445

PS Form 3811, February 2004

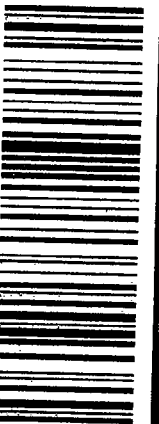
Domestic Return Receipt

102595-02-M-1540

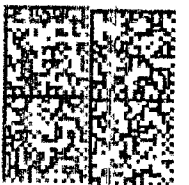




**CHESTER A. HAWKINS**  
**SHERIFF**  
 COURTHOUSE  
 1 NORTH SECOND STREET - SUITE 116  
 CLEARFIELD, PENNSYLVANIA 16830



7005 0390 0003 7235 1445



Hasler

016166505405  
**\$04.88**  
 05/24/2006  
 Mailed From 16830  
**US POSTAGE**

16830/2434

☐ A ☐ INSUFFICIENT ADDRESS  
☐ C ☐ ATTEMPTED NOT KNOWN  
☐ S ☐ NO SUCH NUMBER/STREET  
☐ NOT DELIVERABLE AS ADDRESSED  
☐ UNABLE TO FORWARD

☒ OTHER

**RTS**  
 RETURN TO SENDER

RONDAL L. DAVIDSON  
 750 BIRCH STREET  
 LANSE, PA 16849

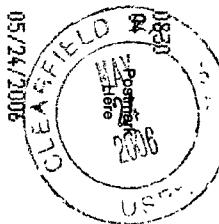
*Handwritten: outside delivery*

**U.S. Postal Service™**  
**CERTIFIED MAIL™ RECEIPT**  
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 Street, Apt. No.,  
 or PO Box No. RONDAL L. DAVIDSON  
 750 BIRCH STREET  
 City, State, ZIP+4 LANSE, PA 16849

PS Form 3800, June 2002 See Reverse for Instructions

7005 0390 0003 7235 1445



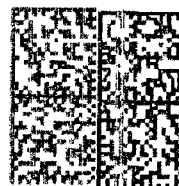
CHESTER A. HAWKINS  
SHERIFF  
COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830

RONDA L. DAVIDSON  
750 BIRCH STREET  
LANSE, PA 16849

☐ A ☐ INSUFFICIENT ADDRESS  
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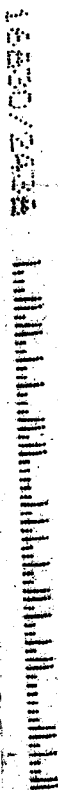
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Law Offices  
**PHELAN HALLINAN & SCHMIEG, LLP**  
One Penn Center at Suburban Station  
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Suite 1400  
Philadelphia, PA 19103-1814  
Christine.Schoffler@fedphe.com

Christine Schoffler  
Judgment Department, Ext. 1286

Representing Lenders in  
Pennsylvania and New Jersey

August 8, 2006

Office of the Sheriff  
Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830

ATTENTION: CINDY (814) 765-5915

Re: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. v.  
CHARLOTTE M. LUNDQUIST RONDA L. DAVIDSON  
No. 05-906-CD  
750 BIRCH STREET, LANSE, PA 16849

Dear Cindy:

Please postpone the Sheriff's Sale of the above referenced property which  
is scheduled for AUGUST 4, 2006.

The property is to be relisted for the OCTOBER 6, 2006 Sheriff's Sale.

Very truly yours,  
CJS  
Christine Schoffler

VIA TELECOPY (814) 765-5915

CC: CHARLOTTE M. RONDA L. DAVIDSON

Law Offices  
**PHELAN HALLINAN & SCHMIEG, LLP**  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814  
**Christine.Schoffler@fedphe.com**

**CHRISTINE SCHOFFLER**  
Judgment Department, Ext. 1286

Representing Lenders in  
Pennsylvania and New Jersey

October 6, 2006

Office of the Sheriff  
Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 16830

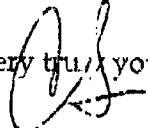
**ATTENTION: CINDY (814) 765-5915**

**Re: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. v. CHARLOTTE M.  
LUNDQUIST RONDA L. DAVIDSON**  
**No. 05-906-CD**  
**750 BIRCH STREET, LANSE, PA 16849**

Dear Cindy:

Please stay the Sheriff's Sale of the above referenced property, which is scheduled for **OCTOBER 6, 2006**, return the original writ of execution to the Prothonotary's office and refund any unused money to our office.

The sum of \$71,690.16 was received in consideration for the stay.

  
Very truly yours,  
Christine Schoffler  
VIA TELECOPY (814) 765-5915