

05-1308-CD  
Mort. Elec. vs Tena R. Jacox et al

Mortgage Electronic Reg. vs. Tena Jacox  
2005-1308-CD

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400  
pleadings@udren.com

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive,  
Suite 200  
Mendota Heights, MN 55120  
Plaintiff

v.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1811 Daisy Street Ext.  
Clearfield, Pa 16830  
Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

AUG 26 2005  
m 12:05/w  
William A. Shaw  
Prothonotary/Clerk of Courts

4 CENTS TO STAFF

NO. 2005-1308-CV

#### COMPLAINT IN MORTGAGE FORECLOSURE

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.

LAWYERS REFERRAL SERVICE  
David S. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext. 5982

**AVISO**

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentear una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

**LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.**

**David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext. 5982**

## **NOTICE**

**The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.**

**If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.**

**This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.**

**UDREN LAW OFFICES, P.C.  
/s/ Mark J. Udren, Esquire  
Woodcrest Corporate Center  
111 Woodcrest Road, Suite 200  
Cherry Hill, NJ 08003-3620  
(856) 669-5400**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: Mortgage Electronic Registration Systems, Inc.

Assignments of Record to: Mortgage Electronic Registration Systems, Inc.

Recording Date: N/A Book: N/A Page: N/A

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 1002 Dorey Street

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Clearfield

COUNTY: Clearfield

DATE EXECUTED: 9/27/04

DATE RECORDED: 10/07/04 Instrument # 200416435

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

(a) by failing or refusing to pay the installments of

principal and interest when due in the amounts indicated below;

(b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 8/16/05:

Principal of debt due	\$71,719.76
Unpaid Interest at 8.25% *	
from 4/1/05	
to 8/16/05	
(the per diem interest accruing on this debt is \$16.44 and that sum should be added each day after 8/16/05)	2,268.72
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Escrow Overdraft/ (Balance) (The monthly escrow on this account is \$88.25 and that sum should be added on the first of each month after 8/16/05)	1,059.00
Late Charges (monthly late charge of \$27.05 should be added in accordance with the terms of the note each month after 8/16/05)	108.20
Attorneys Fees (anticipated and actual to 5% of principal)	<u>3,585.99</u>
TOTAL	\$79,346.67

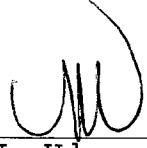
\* This interest rate is subject to adjustment as more fully set forth in the Note and Mortgage.

7. The attorney's fee 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 in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983

and Notice of Intention to Foreclose under Act 6 of 1974 has been sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$79,346.67 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



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Mark J. Udren, ESQUIRE  
UDREN LAW OFFICES, P.C.  
Attorney for Plaintiff  
Attorney I.D. No. 04302

ALL THAT CERTAIN PARCEL OF LAND, WITH A RESIDENTIAL DWELLING AND OTHER IMPROVEMENTS THEREON, SITUATED IN THE BOROUGH OF CLEARFIELD, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT, THE CORNER OF TENTH STREET (FORMERLY NORTH STREET) AND AN ALLEY; THENCE ALONG SAID ALLEY SOUTH SIXTY-TWO AND ONE-FOURTH DEGREES EAST (S 62-1/4° E) EIGHTY-ONE AND THREE-TENTHS (81.3) FEET TO THE CORNER OF LOT NO. 18; THENCE ALONG THE LINE OF LOT NO. 18 SOUTH TWENTY-SEVEN AND THREE-FOURTHS DEGREES WEST (S 27-3/4° W) ONE HUNDRED SEVENTY-TWO (172) FEET TO THE LINE OF DOREY STREET; THENCE ALONG THE LINE OF DOREY STREET NORTH SIXTY-TWO AND ONE-FOURTH DEGREES WEST (N 62-1/4° W) FORTY (40) FEET TO TENTH STREET; THENCE ALONG THE LINE OF TENTH STREET NORTH FOURTEEN AND ONE-FOURTH DEGREES EAST (N 14-1/4° E) ONE HUNDRED SEVENTY-SIX AND NINE-TENTHS (176.9) FEET TO A POST AND THE PLACE OF BEGINNING. BEING LOT NO. 17 IN THE HARRATT ADDITION TO EAST CLEARFIELD.

EXCEPTING THEREFROM ALL ADVERSE CONVEYANCES, EXCEPTIONS AND RESERVATIONS OF RECORD IN CLEARFIELD COUNTY, PENNSYLVANIA.

UNDER AND SUBJECT TO ALL CONDITIONS, RESTRICTIONS, COVENANTS, LIMITATIONS, LEASES, AGREEMENTS, RIGHTS-OF-WAY AND EASEMENTS WHICH ARE EITHER VISIBLE IN AND UPON THE AFORESAID PREMISES OR OF RECORD IN CLEARFIELD COUNTY, PENNSYLVANIA.

## **Homecomings Financial**

July 05, 2005

Certified Mail, Return Receipt Requested

0421792375  
Dennis E Moore  
1811 Daisy Street Ext  
Clearfield, PA 168303223

Re: Property Address: 1002 Dorey Street  
Clearfield, PA 16830

Loan Number: 0421792375

A default exists under the above referenced Mortgage/Deed of Trust loan agreement. The action required to cure the default is the payment of all sums due under the Mortgage/Deed of Trust loan agreement. As of the date of this letter the total amount due is **\$ 2,981.58**. That sum includes the following:

3 payments totaling:	\$ 1,919.28
Late charges:	\$ 162.30
Other fees and/or costs	N/A
Unapplied Funds :	N/A

The total amount due shown above is subject to further increases for additional monthly payments, late charges, attorney fees, and/or other fees and cost which may become due, after the date of this letter. To obtain an update of the total amount due to cure this default, contact us at **1.800.206.2901**.

TO CURE THIS DEFAULT, SEND YOUR CASHIER'S CHECK, MONEY ORDER, OR CERTIFIED CHECK IN THE AMOUNT OF **\$ 2,081.58** BY **August 04, 2005** TO THE FOLLOWING ADDRESS:  
**Homecomings Financial, P.O. Box 78426 Phoenix, AZ 85062-8426 OR OVERNIGHT TO: 1820 East Sky Harbor Circle South, Suite 100 Phoenix, AZ 85034-9700**

If the default is not cured within thirty (30) days of the mailing of this letter, the lender, without further notice or demand, will accelerate the maturity date of the Note and declare all sums secured by the Mortgage/Deed of Trust to be immediately due and payable. The lender then intends to have the property sold at a public foreclosure sale. After acceleration, a curing of the default and reinstatement of the loan will be permitted up to the time of the sale by paying the past due monthly payments and other sums then due under the Mortgage/Deed of Trust loan agreement and by complying with all terms of reinstatement.

You have the right to bring a court action to assert the nonexistence of a default or any other defense that may exist to prevent acceleration and sale of the property.

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.

Sincerely,

### Loan Counseling Department

HIJ

<sup>4</sup>Homeownership counseling is available to you through the 'Credit Counseling Resource Center' (CCRC), an alliance of consumer credit counseling agencies. The CCRC has been retained by Homecomings Financial to provide advice to you on credit issues, including how to reduce debt and improve cash flow management capabilities. You may contact them at 1.877.806.0775 for assistance at no cost to you, or you may wish to contact a HUD-approved housing counseling agency by calling 1.800.569.4287 for further information.

Homecomings Financial  
2711 North Haskell Avenue Suite 900 Dallas, Texas 75204  
800.206.2901 [Homecomings.com](http://Homecomings.com)

**EXHIBIT A**

# ACT 91 NOTICE

## TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

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.

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

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

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

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

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

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA

Date: July 05, 2005

TO: Dennis E Moore  
1811 Daisy Street Ext  
Clearfield, PA 168303223

Premises: 1002 Dorey Street  
Clearfield, PA 16830

Re: Loan Number: 0421792375  
FROM: Homecomings Financial

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

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

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

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

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

**TEMPORARY STAY OF FORECLOSURE** -- Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time, you must arrange and attend a "face-to-face" meeting with one of the consumer credit counseling agencies listed at the end of this Notice. **THIS MEETING MUST OCCUR WITHIN THE NEXT 30 DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT", EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.**

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

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

**LENDER CONTACT IN REGARDS TO PENNSYLVANIA HOUSING FINANCIAL ASSISTANCE**

HomeComings Financial  
9350 Waxie Way Suite 100  
San Diego, CA 92123  
Attn: Contact Center, Fred Mangarelli  
Phone: 1.800.206.2901, or 858.505.7553

**ALL CORRESPONDENCE REGARDING PHFA ASSISTANCE SHOULD BE FORWARDED TO THE ABOVE REFERENCED ADDRESS.**

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

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

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

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

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

**NATURE OF THE DEFAULT** -- The MORTGAGE debt held by the above lender on your property located at:

1002 Dorey Street, Clearfield, PA 16830

IS SERIOUSLY IN DEFAULT because:

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

Monthly payments from 05/01/05 to 07/01/05 totaling:	\$ 1,919.28
Late Charges:	\$ 162.30
Other fees and/or costs (including NSF charges and property inspections):	N/A
LESS: Unapplied Funds:	N/A
<b>TOTAL</b>	<b>\$ 2,081.58</b>

**HOW TO CURE THE DEFAULT** -- You may cure the default within THIRTY (30) DAYS of the date of this Notice **BY PAYING THE TOTAL AMOUNT DUE TO THE LENDER, WHICH IS \$ 2,081.58, PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD.** Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:

**Homecomings Financial, P.O. Box 78426 Phoenix, AZ 85062-8426 OR OVERNIGHT TO:  
1820 East Sky Harbor Circle South, Suite 100 Phoenix, AZ 85034-9700.**

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

**IF THE MORTGAGE IS FORECLOSED UPON** -- The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorney, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all

reasonable attorney's fees actually incurred by the lender, even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

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

**RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE** – If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the total amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. Curing your default in the manner set forth in this Notice will restore your mortgage to the same position as if you had never defaulted.

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

**HOW TO CONTACT THE LENDER:**

Homecomings Financial  
2711 N. Haskell, Suite 900  
Dallas, TX 75204  
Attn: Loan Counseling Department  
Phone: 1.800.206.2901

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

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

**YOU MAY ALSO HAVE THE RIGHT:**

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

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

TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT  
HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT HAVE THIS  
RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR  
YEAR.)

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

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

TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

Sincerely,

Loan Counseling Department

Enclosure(s)  
List of Counseling Agencies

V E R I F I C A T I O N

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation unless designated otherwise; that he is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

  
Mark J. Udren, ESQUIRE  
UDREN LAW OFFICES, P.C.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100768  
NO: 05-1308-CD  
SERVICE # 1 OF 4  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC  
vs.  
DEFENDANT: TENA R. JACOX, (Real Owner), DENIS E. MOORE (Mortgagor)

**SHERIFF RETURN**

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NOW, September 20, 2005 AT 2:11 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON TENA R. JACOX (Real Owner) DEFENDANT AT MEETING PLACE: 1002 DOREY ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TENA R. JACOX, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

FILED  
03:30 PM  
DEC 27 2005  
William A. Shaw  
Prothonotary/Clerk of Courts

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

DOCKET # 100768  
NO: 05-1308-CD  
SERVICE # 2 OF 4  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC  
VS.  
DEFENDANT: TENA R. JACOX, (Real Owner), DENIS E. MOORE (Mortgagor)

**SHERIFF RETURN**

NOW, September 20, 2005 AT 2:11 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON TENA R. JACOX (Real Owner) DEFENDANT AT 1002 DOREY ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TENA R. JACOX, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

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

DOCKET # 100768  
NO: 05-1308-CD  
SERVICE # 3 OF 4  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC  
vs.  
DEFENDANT: TENA R. JACOX, (Real Owner), DENIS E. MOORE (Mortgagor)

**SHERIFF RETURN**

---

NOW, September 20, 2005 AT 2:11 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON DENNIS E. MOORE (Mortgagor) DEFENDANT AT MEETING PLACE: 1002 DOREY ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TENA R. JACOX, ADULT AT RESIDENCE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

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

DOCKET # 100768  
NO: 05-1308-CD  
SERVICE # 4 OF 4  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC

VS.

DEFENDANT: TENA R. JACOX, (Real Owner), DENIS E. MOORE (Mortgagor)

**SHERIFF RETURN**

---

NOW, September 20, 2005 AT 2:11 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON DENNIS E. MOORE (Mortgagor) DEFENDANT AT 1002 DOREY ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TENA R. JACOX, ADULT AT RESIDENCE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100768  
NO: 05-1308-CD  
SERVICES 4  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC

vs.

DEFENDANT: TENA R. JACOX, (Real Owner), DENIS E. MOORE (Mortgagor)

**SHERIFF RETURN**

---

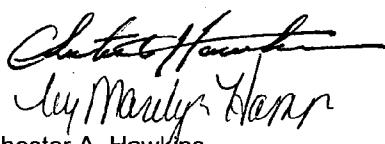
**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	42061	40.00
SHERIFF HAWKINS	UDREN	42061	38.00

Sworn to Before Me This

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

So Answers,



Chester A. Hawkins  
Sheriff

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite 200  
Mendota Heights, MN 55120  
Plaintiff

v.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, PA 16830  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2005-1308-CD

FILED *Atty pd*  
*11:30 AM 20.00*  
FEB 14 2006 *Notice to*  
William A. Shaw  
Prothonotary/Clerk of Courts  
*Statement to Atty*  
*60*

**PRAECIPE FOR JUDGMENT FOR FAILURE TO  
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) **Tena R. Jacox (Real Owner) and Dennis E. Moore, (Mortgagor)** 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 Complaint	\$79,346.67
Interest Per Complaint	2,909.88
From 8/17/05 to 2/9/06	
Late charges per Complaint	135.25
From 8/17/05 to 2/9/06	
Escrow payment per Complaint	<u>529.50</u>
From 8/17/05 to 2/9/06	
 TOTAL	 <u>\$82,921.30</u>

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

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE  
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: February 14, 2006

PRO PROTHY

*William A. Shaw*

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic Registration Systems,  
Inc.

Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
Defendant(s)

NO. 2005-1308-CD

TO: Tena R. Jacox (Real Owner)  
1002 Dorey Street  
Clearfield, PA 16830

DATE of Notice: October 14, 2005

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.

LAWYER REFERRAL SERVICE  
David S. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext. 5982

NOTIFICACION IMPORTANTE

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUIRIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO IMMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASSISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL  
LAWYER REFERRAL SERVICE  
David S. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641, ext. 5982

NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Mark J. Udren, Esquire  
Woodcrest Corporate Center  
111 Woodcrest Road, Suite 200  
Cherry Hill, New Jersey 08003-3620

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-482-6900

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff

v.  
Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1811 Daisy Street Ext.  
Clearfield, Pa 16830  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2005-1308-CD

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF Minnesota : SS  
COUNTY OF Dakota :

THE UNDERSIGNED being duly sworn, deposes and says that the averments herein are based upon investigations made and records maintained by us either as Plaintiff or as servicing agent of the Plaintiff herein and that the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended, and that the age and last known residence and employment of each Defendant are as follows:

Defendant: Tena R. Jacox (Real Owner)  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

Defendant: Dennis E. Moore, (Mortgagor)  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

Name: DICK WILKEN  
Title: Assistant Vice President  
Company: Homecomings Financial Network

Sworn to and subscribed  
before me this day  
of , 20 .

Rachel Patrice Bahr  
Notary Public



UDREN LAW OFFICES, P.C.  
BY: Mark J. Udran, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, PA 16830  
Defendant(s)

NO. 2005-1308-CD

TO: Tena R. Jacox (Real Owner)  
1002 Dorey Street  
Clearfield, PA 16830

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Prothonotary *Carl W. Hagan 2/14/00* *BN*

- Judgment by Default
- Money Judgment
- Judgment in Replevin
- Judgment for Possession
- Judgment on Award of Arbitration
- Judgment on Verdict
- Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udran, Esquire

At this telephone number: 856-669-5400.

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

v.  
Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, PA 16830  
Defendant(s)

NO. 2005-1308-CD

TO: Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, PA 16830

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Prothonotary *W. L. Shahan* 2/14/06

- Judgment by Default
- Money Judgment
- Judgment in Replevin
- Judgment for Possession
- Judgment on Award of Arbitration
- Judgment on Verdict
- Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-669-5400.

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

CC BY

Mortgage Electronic Registration Systems, Inc.  
Plaintiff(s)

No.: 2005-01308-CD

Real Debt: \$82,921.30

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

Tena R. Jacox

Entry: \$20.00

Dennis E. Moore

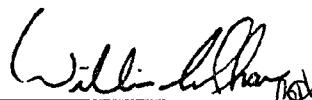
Defendant(s)

Instrument: Default Judgment

Date of Entry: February 14, 2006

Expires: February 14, 2011

Certified from the record this 14th day of February, 2006.



William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

Received on \_\_\_\_\_, of defendant full satisfaction of this Judgment,  
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

\_\_\_\_\_  
Plaintiff/Attorney

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff  
v.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, Pa 16830  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2005-1308-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE SHERIFF:

Issue Writ of Execution in the above matter:

Amount due	\$80,728.07
Interest From 10/26/05	
to Date of Sale	
Ongoing Per Diem of \$16.44	
to actual date of sale including if sale is held at a later date	
(Costs to be added)	\$
	125.00
	Prothonotary costs

UDREN LAW OFFICES, P.C.

Mark J. Udren ESQUIRE  
ATTORNEY FOR PLAINTIFF

FILED Atty pd. 20.00  
M1205A  
FEB 14 2006 ICC-Lewnts  
w/prop. descr.  
to Shff

William A. Shaw  
Prothonotary/Clerk of Courts

(K)

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite 200  
Mendota Heights, MN 55120

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

Plaintiff

v.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, PA 16830

NO. 2005-1308-CD

Defendant(s)

C E R T I F I C A T E

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff in the above-captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

- An FHA insured mortgage
- Non-owner occupied
- Vacant
- Act 91 procedures have been fulfilled.
- Over 24 months delinquent.

This certification is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic Registration  
Systems, Inc.  
1270 Northland Drive, Suite 200  
Mendota Heights, MN 55120

**Plaintiff**

v.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, PA 16830

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

**MORTGAGE FORECLOSURE**

NO. 2005-1308-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

Mortgage Electronic Registration Systems, Inc., Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praeclipe for the Writ of Execution was filed the following information concerning the real property located at: 1002 Dorey Street Clearfield, PA 16830

Tena R. Jacox (Real Owner) 1002 Dorey Street  
Clearfield, PA 16830

2. Name and address of Defendant(s) in the judgment  
Name \_\_\_\_\_ Address \_\_\_\_\_

Dennis E. Moore, (Mortgagor) 1002 Dorey Street  
Clearfield, PA 16830

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

Name \_\_\_\_\_ Address \_\_\_\_\_

Plaintiff herein. See Caption above.

5. Name and address of every other person who has any record lien on the property:

Name \_\_\_\_\_ Address \_\_\_\_\_

None

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

Name \_\_\_\_\_ Address \_\_\_\_\_

Real Estate Tax Dept. 1 North Second Street, Suite 116  
Clearfield, PA 16830

Domestic Relations Section 1 North Second Street, Suite 116  
Clearfield, PA 16830

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

Name \_\_\_\_\_ Address \_\_\_\_\_

Tenants/Occupants 1002 Dorey Street  
Clearfield, PA 16830

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

UDREN LAW OFFICES, P.C.

DATED: February 9, 2006

~~Mark J. Udren ESO  
Attorney for Plaintiff~~

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff

v.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, Pa 16830  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2005-1308-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

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

1002 Dorey Street, Clearfield, PA 16830  
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$80,728.07

Interest From 10/26/05 \_\_\_\_\_

to Date of Sale \_\_\_\_\_

Ongoing Per Diem of \$16.44

to actual date of sale including if sale is held at a later date

(Costs to be added) Prothonotary costs \$ 125.00

By Willie L. Sharpe Prothonotary  
Clerk

Date 2/14/06

COURT OF COMMON PLEAS  
NO. 2005-1308-CD

Mortgage Electronic Registration Systems, Inc.

vs.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)

WRIT OF EXECUTION

REAL DEBT \$ 82,921.30

INTEREST \$ \_\_\_\_\_

from 2/10/06

to Date of Sale \_\_\_\_\_

Ongoing Per Diem of \$16.44

to actual date of sale including if sale is  
held at a later date

COSTS PAID:

PROTHY \$ 125.00

SHERIFF \$ \_\_\_\_\_

STATUTORY \$ \_\_\_\_\_

COSTS DUE PROTHY. \$ \_\_\_\_\_

PREMISES TO BE SOLD:

1002 Dorey Street

Clearfield, PA 16830

Mark J. Udren, ESQUIRE  
UDREN LAW OFFICES, P.C.  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
(856) 669-5400  
E-MAIL: UDREN@Juno.com

ALL THAT CERTAIN PARCEL OF LAND, WITH A RESIDENTIAL DWELLING AND OTHER IMPROVEMENTS THEREON, SITUATED IN THE BOROUGH OF CLEARFIELD, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT, THE CORNER OF TENTH STREET (FORMERLY NORTH STREET) AND AN ALLEY; THENCE ALONG SAID ALLEY SOUTH SIXTY-TWO AND ONE-FOURTH DEGREES EAST (S 62-1/4° E) EIGHTY-ONE AND THREE-TENTHS (81.3) FEET TO THE CORNER OF LOT NO. 18; THENCE ALONG THE LINE OF LOT NO. 18 SOUTH TWENTY-SEVEN AND THREE-FOURTHS DEGREES WEST (S 27-3/4° W) ONE HUNDRED SEVENTY-TWO (172) FEET TO THE LINE OF DOREY STREET; THENCE ALONG THE LINE OF DOREY STREET NORTH SIXTY-TWO AND ONE-FOURTH DEGREES WEST (N 62-1/4° W) FORTY (40) FEET TO TENTH STREET; THENCE ALONG THE LINE OF TENTH STREET NORTH FOURTEEN AND ONE-FOURTH DEGREES EAST (N 14-1/4° E) ONE HUNDRED SEVENTY-SIX AND NINE-TENTHS (176.9) FEET TO A POST AND THE PLACE OF BEGINNING. BEING LOT NO. 17 IN THE HARRATT ADDITION TO EAST CLEARFIELD.

EXCEPTING THEREFROM ALL ADVERSE CONVEYANCES, EXCEPTIONS AND RESERVATIONS OF RECORD IN CLEARFIELD COUNTY, PENNSYLVANIA.

UNDER AND SUBJECT TO ALL CONDITIONS, RESTRICTIONS, COVENANTS, LIMITATIONS, LEASES, AGREEMENTS, RIGHTS-OF-WAY AND EASEMENTS WHICH ARE EITHER VISIBLE IN AND UPON THE AFORESAID PREMISES OR OF RECORD IN CLEARFIELD COUNTY, PENNSYLVANIA.

BEING KNOWN AS: 1002 DOREY STREET  
CLEARFIELD, PA 16830

PROPERTY ID NO.: 4.4-K08-248-00089

TITLE TO SAID PREMISES IS VESTED IN TENA R. JACOX, WIDOW BY DEED FROM ROBERT D. TERRY, A SINGLE INDIVIDUAL DATED 4/4/94 RECORDED 4/5/94 IN DEED BOOK 1596 PAGE 357.

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.  
Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
Defendant(s)

NO. 2005-1308-CD

**PRAECIPE TO SUBSTITUTE VERIFICATION**

TO THE PROTHONOTARY:

Kindly substitute the attached Verification for the Verification attached to the Complaint in Mortgage Foreclosure with regard to the captioned matter.

UDREN LAW OFFICES, P.C.

DATED: February 9, 2006

BY:

Mark J. Udren, Esquire  
Attorney for Plaintiff

FILED NO cc  
m 113061  
FEB 14 2006  
(60)

William A. Shaw  
Prothonotary/Clerk of Courts

V E R I F I C A T I O N

The undersigned, an officer of the Corporation which is the Plaintiff in the foregoing Complaint or an officer of the Corporation which is the servicing agent of Plaintiff, and being authorized to make this verification on behalf of the Plaintiff, hereby verifies that the facts set forth in the foregoing Complaint are taken from records maintained by persons supervised by the undersigned who maintain the business records of the mortgage held by Plaintiff in the ordinary course of business and that those facts are true and correct to the best of the knowledge, information and belief of the undersigned.

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

Date: \_\_\_\_\_

  
Name: Dick Wilken  
Title: Assistant Vice President  
Company: Homecomings Financial  
Network

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
Loan #0421792375  
MJU #05080325

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2005-1308-CD

v.  
Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, Pa 16830  
Defendant(s)

PRAECIPE TO FILE PROOF OF SERVICE

TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to  
the captioned matter.

UDREN LAW OFFICES, P.C.

Date: March 16, 2006

BY:

Mark J. Udren, Esquire  
Attorney for Plaintiff

FILED NO CC  
M 11:00 AM  
MAR 23 2006  
CM

William A. Shaw  
Prothonotary/Clerk of Courts



APS International Plaza  
7800 Glenroy Rd.  
Minneapolis, MN 55439-3122

APS File #: 076016-0001

## AFFIDAVIT OF SERVICE -- Individual

UDREN LAW OFFICES, P.C.  
Ms. Henni Crommarty  
111 Woodcrest Rd, Suite 200  
Cherry Hill, NJ 08003-3620

Service of Process on:

—Tena R. Jacox  
Court Case No. 2005-1308-CD

State of: Penns ss.

County of: Clearfield

Name of Server:

Thomas Holmberg, undersigned, being duly sworn, deposes and says that at the time of service, s/he was of legal age and was not a party to this action;

Date/Time of Service: that on the 9th day of March, 2006, at 4:00 o'clock P M

Place of Service: at 1811 Daisy Street Ext., in Clearfield, PA 16830

Documents Served: the undersigned served the documents described as:  
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:

Person Served, and

Method of Service:

By personally delivering them into the hands of the person to be served.

By delivering them into the hands of \_\_\_\_\_, a person of suitable age, who verified, or who upon questioning stated, that he/she resides with Tena R. Jacox

at the place of service, and whose relationship to the person is: \_\_\_\_\_

The person receiving documents is described as follows:

Sex F; Skin Color W; Hair Color Br; Facial Hair \_\_\_\_\_

Approx. Age 40; Approx. Height 5'6"; Approx. Weight 160

To the best of my knowledge and belief, said person was not engaged in the US Military at the time of service.

Signature of Server:

Undersigned declares under penalty of perjury that the foregoing is true and correct.

Thomas Holmberg  
Signature of Server

APS International, Ltd.

Subscribed and sworn to before me this

10th day of MARCH, 2006  
Marilyn A. Campbell 10-28-07  
Notary Public (Commission Expires)

### COMMONWEALTH OF PENNSYLVANIA

Notarial Seal  
Marilyn A. Campbell, Notary Public  
City of Altoona, Blair County  
My Commission Expires Oct. 28, 2007

Member, Pennsylvania Association of Notaries



1-800-328-7171

APS International Plaza  
7800 Glenroy Rd.  
Minneapolis, MN 55439-3122

APS File #: 076016-0001

## AFFIDAVIT OF SERVICE – Individual

UDREN LAW OFFICES, P.C.  
Ms. Henni Crommarty  
111 Woodcrest Rd, Suite 200  
Cherry Hill, NJ 08003-3620

Service of Process on:

–Dennis E. Moore  
Court Case No. 2005-1308-CD

State of: Penna ss.

County of: Clearfield

Name of Server:

Thomas Holmberg, undersigned, being duly sworn, deposes and says  
that at the time of service, s/he was of legal age and was not a party to this action;

Date/Time of Service:

that on the 9<sup>th</sup> day of March, 20 06, at 4:00 o'clock P M

Place of Service:

at 1811 Daisy Street Ext., in Clearfield, PA 16830

Documents Served:

the undersigned served the documents described as:  
Notice of Sheriff's Sale of Real Property

Service of Process on:

A true and correct copy of the aforesaid document(s) was served on:  
Dennis E. Moore

Person Served, and  
Method of Service:

By personally delivering them into the hands of the person to be served.  
 By delivering them into the hands of Tena R. Jacob, a person  
of suitable age, who verified, or who upon questioning stated, that he/she resides with  
Dennis E. Moore

at the place of service, and whose relationship to the person is: \_\_\_\_\_

The person receiving documents is described as follows:

Sex F; Skin Color W; Hair Color Brn; Facial Hair \_\_\_\_\_  
Approx. Age 40; Approx. Height 5'6"; Approx. Weight 160

To the best of my knowledge and belief, said person was not engaged in the US Military at  
the time of service.

Signature of Server:

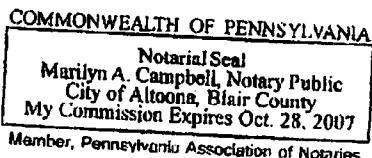
Undersigned declares under penalty of perjury  
that the foregoing is true and correct.

Thomas Holmberg  
Signature of Server

APS International, Ltd.

Subscribed and sworn to before me this

10<sup>th</sup> day of MARCH, 20 06  
Marilyn A. Campbell 10-28-07  
Notary Public (Commission Expires)



UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff

v.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, Pa 16830  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2005-1308-CD

FILED <sup>NO CC</sup>  
MAY 10 2006  
MAY 10 2006

William A. Shaw  
Prothonotary/Clerk of Courts

**AMENDED AFFIDAVIT OF SERVICE PURSUANT TO Pa.R.C.P.RULE 3129.1**

Plaintiff, by its/his/her Attorney, Mark J. Udren, Esquire, hereby verifies that:

1. A copy of the Notice of Sheriff's Sale, a true and correct copy of which is attached hereto as Exhibit "A", was sent to every recorded lienholder and every other interested party known as of the date of the filing of the Praecept for the Writ of Execution, on the date(s) appearing on the attached Certificates of Mailing.

2. A Notice of Sheriff's Sale was sent to Defendant(s) by regular mail and certified mail on the date appearing on the attached Return Receipt, which was signed for by Defendant(s) on the date specified on the said Return Receipt. Copies of the said Notice and Return Receipt are attached hereto as Exhibit "B".

3. If a Return Receipt is not attached hereto, then service was by personal service on the date specified on the attached Return of Service, attached hereto as Exhibit "B".

4. If service was by Order of Court, then proof of compliance with said Order is attached hereto as Exhibit "B".

All Notices were served within the time limits set forth by Pa Rule C.P. 3129.

This Affidavit is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Dated: May 1, 2006

UDREN LAW OFFICES, P.C.

BY:

Mark J. Udren, Esquire  
Attorney for Plaintiff

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

**ATTORNEY FOR PLAINTIFF**

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120

Plaintiff

v.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, Pa 16830

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

## MORTGAGE FORECLOSURE

NO. 2005-1308-CD

**AMENDED AFFIDAVIT PURSUANT TO RULE 3129.1**

Mortgage Electronic Registration Systems, Inc., Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecept for the Writ of Execution was filed the following information concerning the real property located at:  
1002 Dorey Street, Clearfield, PA 16830

Tena R. Jacox (Real Owner) 1811 Daisy Street Ext.  
Clearfield, Pa 16830

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

Dennis E. Moore, (Mortgagor) 1811 Daisy Street Ext.  
Clearfield Pa 16830

Name \_\_\_\_\_ Address \_\_\_\_\_

## Notes

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

Name Address

Plaintiff herein. See Caption above.

MERS, Inc. as Nominee for Chase Home Finance 8201 Greensboro Drive, Suite 350  
McClean, VA 22102

5. Name and address of every other person who has any record lien on the property:

Name Address

None

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

Name Address

Real Estate Tax Dept. 1 North Second Street, Suite 116,  
Clearfield, PA 16830

Domestic Relations Section 1 North Second Street, Suite 116,  
Clearfield, PA 16830

PA Department of Revenue P.O. Box 281230  
Bureau of Compliance Harrisburg, PA 17128-1230

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

Name Address

Tenants/Occupants 1002 Dorey Street  
Clearfield, PA 16830

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

UDREN LAW OFFICES, P.C.

DATED: May 1, 2006

Mark J. Udren, Esquire  
Attorney for Plaintiff

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff

v.  
Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, Pa 16830  
Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
NO. 2005-1308-CD

DATE: March 1, 2006

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

NOTICE OF SHERIFF'S SALE  
OF REAL PROPERTY

OWNER(S): TENA R. JACOX, REAL OWNER AND DENNIS E. MOORE, MORTGAGOR

PROPERTY: 1002 Dorey Street, Clearfield, PA 16830

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on May 5, 2006, at 10:00 am, at the CLEARFIELD COUNTY COURTHOUSE, 1 NORTH SECOND STREET, SUITE 116, CLEARFIELD, PA. Our records indicate that you may hold a mortgage or judgment on the property which will be extinguished by the sale. You may wish to attend the sale to protect your interests.

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

EXHIBIT A

<b>Name and Address Of Sender</b>  <b>UDREN LAW OFFICES, P.C.</b> <b>WOODCREST CORPORATE CENTER</b> <b>111 WOODCREST ROAD</b> <b>CHERRY HILL, NEW JERSEY 08003</b>		<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input type="checkbox"/> COD <input type="checkbox"/> Certified		<input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Int'l Recorded Del. <input type="checkbox"/> Express Mail		<input type="checkbox"/> Registered Mail: <input type="checkbox"/> With Postal Insurance <input type="checkbox"/> Without Postal Insurance		<i>Postmark and Date of Receipt</i>					
Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge	Act. Value (If Regis.)	Insured Value	Due Sender If COD	R.R. Fee	S.D. Fee	S.H. Fee	Rst. Del. Fee	Remarks
1	JACOX	CLEARFIELD COUNTY REAL ESTATE TAX DEPT. 1 N. 2 <sup>ND</sup> ST., STE 116, CLEARFIELD, PA 16830											
2		DOMESTIC RELATIONS SECTION 1 N. 2ND ST., STE 116, CLEARFIELD, PA 16830											
3	05080325	PA DEPT OF REV, BUREAU OF COMPLIANCE, P.O. BOX 281230, HARRISBURG, PA 17128-1230											
4		TENANTS/OCCUPANTS 1002 DOREY STREET, CLEARFIELD, PA 16830											
5	2005-1308												
6													
7	CLEAR FIELD												
8													
9	HENNI												
10													
11													
12													
13													
14													
15													

Affix stamp here if issued as certificate of mailing or for additional copies of this bill.

Postmark and Date of Receipt

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 document. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R800, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on International mail. Special handling charges apply only to third and forth class parcels.

<b>UDREN LAW OFFICES, P.C.</b> <b>WOODCREST CORPORATE CENTER</b> <b>111 WOODCREST ROAD</b> <b>CHERRY HILL, NEW JERSEY 08003</b>		<input type="checkbox"/> Registered Merchandise <input type="checkbox"/> Insured <input type="checkbox"/> COD <input type="checkbox"/> Certified		<input type="checkbox"/> Return Receipt for Int'l Recorded Del. <input type="checkbox"/> Express Mail		<input type="checkbox"/> Check appropriate block for Registered Mail: <input type="checkbox"/> With Postal Insurance <input type="checkbox"/> Without postal Insurance		<i>Postmark and Date of Receipt</i>		<small>Affix stamp here if issued as certificate of mailing or for additional copies of this bill.</small>			
Line	Article Number	Name of Addressee, Street, and Post Office Address		Postage	Fee	Handling Charge	Act. Value (If Regis.)	Insured Value	Due Sender If COD	R.R. Fee	S.H. Fee	Rst. Del. Fee	Remarks
1	MOORE/JACOX	MERS, INC. AS NOMINEE FOR CHASE HOME FINANCE 8201 GREENSBORO DRIVE, STE 350, MCLEAN, VA 22102											
2													
3	05080325												
4													
5	2005-1308												
6													
7	CLEAR FIELD												
8													
9	HENNI												
10													
11	05/05/2006												
12													
13													
14													
15													
Total number of Pieces Listed by Sender <b>1</b>		Total Number of Pieces Received at Post Office <b>0</b>		Postmaster, Per (Name of Receiving Employee) 		<small>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 postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to third and forth class parcels.</small>							

**EXHIBIT A**

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2005-1308-CD

v.  
Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, Pa 16830  
Defendant(s)

PRAECIPE TO FILE PROOF OF SERVICE

TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to  
the captioned matter.

UDREN LAW OFFICES, P.C.

Date: March 16, 2006

BY:

Mark J. Udren, Esquire  
Attorney for Plaintiff

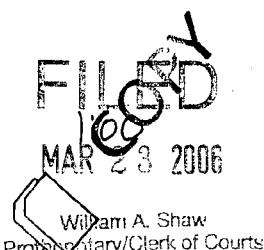
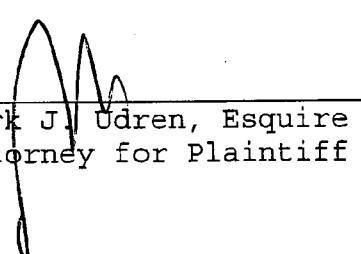


EXHIBIT B

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2005-1308-CD

v.  
Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, Pa 16830  
Defendant(s)

**PRAECIPE TO FILE PROOF OF SERVICE**

TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to  
the captioned matter.

UDREN LAW OFFICES, P.C.

Date: March 16, 2006

BY:

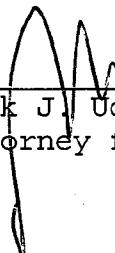
  
Mark J. Udren, Esquire  
Attorney for Plaintiff

EXHIBIT B

Mortgage Electronic Registration Systems, Inc., et. al., Plaintiff(s)  
vs.  
Tena R. Jacox, et. al., Defendant(s)



Service of Process by  
**APS International, Ltd.**  
**1-800-328-7171**  
APS International Plaza  
7800 Glenroy Rd.  
Minneapolis, MN 55439-3122

APS File #: 076016-0001

## AFFIDAVIT OF SERVICE -- Individual

Service of Process on:

--Dennis E. Moore  
Court Case No. 2005-1308-CD

UDREN LAW OFFICES. P.C.  
Ms. Henni Crommarty  
111 Woodcrest Rd, Suite 200  
Cherry Hill, NJ 08003-3620

State of: Penna. ss.

County of: Clearfield

Name of Server: Thomas Holmberg, undersigned, being duly sworn, deposes and says that at the time of service, s/he was of legal age and was not a party to this action;

Date/Time of Service: that on the 9<sup>th</sup> day of March, 20 06, at 4:00 o'clock P M

Place of Service: at 1811 Daisy Street Ext., in Clearfield, PA 16830

Documents Served: the undersigned served the documents described as:  
Notice of Sheriff's Sale of Real Property

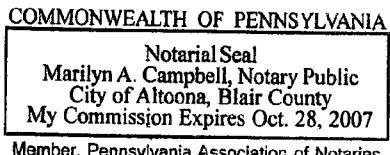
Service of Process on: A true and correct copy of the aforesaid document(s) was served on:  
Dennis E. Moore

Person Served, and Method of Service:  By personally delivering them into the hands of the person to be served.  
 By delivering them into the hands of Tena R. Jacox, a person of suitable age, who verified, or who upon questioning stated, that he/she resides with Dennis E. Moore  
at the place of service, and whose relationship to the person is: \_\_\_\_\_

Description of Person Receiving Documents: The person receiving documents is described as follows:  
Sex F; Skin Color W; Hair Color Br; Facial Hair \_\_\_\_\_  
Approx. Age 40; Approx. Height 5'6"; Approx. Weight 160  
 To the best of my knowledge and belief, said person was not engaged in the US Military at the time of service.

Signature of Server: Undersigned declares under penalty of perjury that the foregoing is true and correct. Thomas Holmberg Subscribed and sworn to before me this 10<sup>th</sup> day of MARCH, 20 06  
Signature of Server Marilyn A. Campbell Notary Public 10-28-07 (Commission Expires)

**APS International, Ltd.**



Member, Pennsylvania Association of Notaries

**EXHIBIT B**

Mortgage Electronic Registration Systems, Inc., et. al., Plaintiff(s)  
vs.  
Tena R. Jacox, et. al., Defendant(s)



Service of Process by  
**APS International, Ltd.**

**1-800-328-7171**

APS International Plaza  
7800 Glenroy Rd.  
Minneapolis, MN 55439-3122

APS File #: 076016-0001

## AFFIDAVIT OF SERVICE -- Individual

Service of Process on:

UDREN LAW OFFICES. P.C.  
Ms. Henni Crommarty  
111 Woodcrest Rd, Suite 200  
Cherry Hill, NJ 08003-3620

--Tena R. Jacox  
Court Case No. 2005-1308-CD

State of: Penna ss.

County of: Clearfield

Name of Server: Thomas Holmberg, undersigned, being duly sworn, deposes and says that at the time of service, s/he was of legal age and was not a party to this action;

Date/Time of Service: that on the 9<sup>th</sup> day of March, 2006, at 4:00 o'clock P M

Place of Service: at 1811 Daisy Street Ext., in Clearfield, PA 16830

Documents Served: the undersigned served the documents described as:  
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:

Tena R. Jacox

By personally delivering them into the hands of the person to be served.

By delivering them into the hands of \_\_\_\_\_, a person of suitable age, who verified, or who upon questioning stated, that he/she resides with  
Tena R. Jacox

at the place of service, and whose relationship to the person is: \_\_\_\_\_

Description of Person Receiving Documents: The person receiving documents is described as follows:

Sex F; Skin Color W; Hair Color Brn; Facial Hair \_\_\_\_\_

Approx. Age 40; Approx. Height 5'6"; Approx. Weight 160

To the best of my knowledge and belief, said person was not engaged in the US Military at the time of service.

Signature of Server: Undersigned declares under penalty of perjury that the foregoing is true and correct.

Thomas Holmberg  
Signature of Server

Subscribed and sworn to before me this

10<sup>th</sup> day of MARCH, 2006  
Marilyn A. Campbell 10-28-07  
Notary Public (Commission Expires)

**APS International, Ltd.**

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal  
Marilyn A. Campbell, Notary Public  
City of Altoona, Blair County  
My Commission Expires Oct. 28, 2007

Member, Pennsylvania Association of Notaries

**EXHIBIT B**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20282  
NO: 05-1308CD

PLAINTIFF: MORTGAGE ELECTRONIC  
vs.  
DEFENDANT: TINA R. JACOX AND DENNIS E. MOORE

Execution REAL ESTATE

**SHERIFF RETURN**

DATE RECEIVED WRIT: 02/14/2006

LEVY TAKEN 02/17/2006 @ 11:11 AM

POSTED 02/17/2006 @ 11:11 AM

SALE HELD 05/05/2006

SOLD TO JPMORGAN CHASE BANK AS TRUSTEE (MERS IS ACTING/HAS ACTED AS THE AGENT FOR  
THE REAL PARTY IN INTEREST OR BENEFICIAL OWNER)

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 06/15/2006

DATE DEED FILED 06/15/2006

PROPERTY ADDRESS 1002 DOREY STREET CLEARFIELD , PA 16830

**SERVICES**

@ SERVED TENA R. JACOX

NOT SERVED HOUSE EMPTY

FILED  
0/11/2006 LM  
JUN 16 2006 LM

@ SERVED DENNIS E. MOORE

NOT SERVED HOUSE EMPTY.

William A. Shaw  
Prothonotary

04/03/2006 @ 8:04 AM SERVED TENA R. JACOX

SERVED, TENA R. JACOX, DEFENDANT, AT HER RESIDENCE 1811 DAISY STREET, EXT., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO DENNIS MOORE, BOYFRIEND/CO DEFENDANT

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

04/02/2006 @ 8:04 AM SERVED DENNIS E. MOORE

SERVED DENNIS E. MOORE, DEFENDANT, AT HIS RESIDENCE 1811 DAISY STREET EXT., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO DENNIS E. MOORE

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20282  
NO: 05-1308CD

PLAINTIFF: MORTGAGE ELECTRONIC

vs.

DEFENDANT: TINA R. JACOX AND DENNIS E. MOORE

Execution REAL ESTATE

SHERIFF RETURN

---

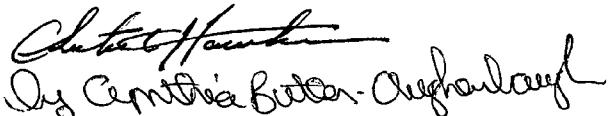
SHERIFF HAWKINS \$208.44

SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This

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

So Answers,

  
By Cynthia Butter-Aughmire  
Chester A. Hawkins  
Sheriff

UDREN LAW OFFICES, P.C.  
BY: Mark J. Udren, Esquire  
ATTY I.D. NO. 04302  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400

ATTORNEY FOR PLAINTIFF

Mortgage Electronic  
Registration Systems, Inc.  
1270 Northland Drive, Suite  
200  
Mendota Heights, MN 55120  
Plaintiff

v.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)  
1002 Dorey Street  
Clearfield, Pa 16830  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2005-1308-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

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

1002 Dorey Street, Clearfield, PA 16830  
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$80,728.07

Interest From 10/26/05

to Date of Sale \_\_\_\_\_

Ongoing Per Diem of \$16.44

to actual date of sale including if sale is held at a later date

Prothonotary costs 125.00  
(Costs to be added)

Received February 14, 2006 @ 3:00 P.M.  
Cynthia Hawkins  
Sgt Cynthia Butler-Clyburnay

By Willie L. Johnson Prothonotary  
Clerk

Date 2/14/06

COURT OF COMMON PLEAS  
NO. 2005-1308-CD

Mortgage Electronic Registration Systems, Inc.  
vs.

Tena R. Jacox (Real Owner)  
Dennis E. Moore, (Mortgagor)

WRIT OF EXECUTION

REAL DEBT \$ 82,921.30

INTEREST \$ \_\_\_\_\_

from 2/10/06 \_\_\_\_\_

to Date of Sale \_\_\_\_\_

Ongoing Per Diem of \$16.44  
to actual date of sale including if sale is  
held at a later date

COSTS PAID:

PROTHY \$ 125.00

SHERIFF \$ \_\_\_\_\_

STATUTORY \$ \_\_\_\_\_

COSTS DUE PROTHY. \$ \_\_\_\_\_

PREMISES TO BE SOLD:

1002 Dorey Street  
Clearfield, PA 16830

Mark J. Udren, ESQUIRE  
UDREN LAW OFFICES, P.C.  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
(856) 669-5400

ALL THAT CERTAIN PARCEL OF LAND, WITH A RESIDENTIAL DWELLING AND OTHER IMPROVEMENTS THEREON, SITUATED IN THE BOROUGH OF CLEARFIELD, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT, THE CORNER OF TENTH STREET (FORMERLY NORTH STREET) AND AN ALLEY; THENCE ALONG SAID ALLEY SOUTH SIXTY-TWO AND ONE-FOURTH DEGREES EAST (S 62-1/4° E) EIGHTY-ONE AND THREE-TENTHS (81.3) FEET TO THE CORNER OF LOT NO. 18; THENCE ALONG THE LINE OF LOT NO. 18 SOUTH TWENTY-SEVEN AND THREE-FOURTHS DEGREES WEST (S 27-3/4° W) ONE HUNDRED SEVENTY-TWO (172) FEET TO THE LINE OF DOREY STREET; THENCE ALONG THE LINE OF DOREY STREET NORTH SIXTY-TWO AND ONE-FOURTH DEGREES WEST (N 62-1/4° W) FORTY (40) FEET TO TENTH STREET; THENCE ALONG THE LINE OF TENTH STREET NORTH FOURTEEN AND ONE-FOURTH DEGREES EAST (N 14-1/4° E), ONE HUNDRED SEVENTY-SIX AND NINE-TENTHS (176.9) FEET TO A POST AND THE PLACE OF BEGINNING. BEING LOT NO. 17 IN THE HARRATT ADDITION TO EAST CLEARFIELD.

EXCEPTING THEREFROM ALL ADVERSE CONVEYANCES, EXCEPTIONS AND RESERVATIONS OF RECORD IN CLEARFIELD COUNTY, PENNSYLVANIA.

UNDER AND SUBJECT TO ALL CONDITIONS, RESTRICTIONS, COVENANTS, LIMITATIONS, LEASES, AGREEMENTS, RIGHTS-OF-WAY AND EASEMENTS WHICH ARE EITHER VISIBLE IN AND UPON THE AFORESAID PREMISES OR OF RECORD IN CLEARFIELD COUNTY, PENNSYLVANIA.

BEING KNOWN AS: 1002 DOREY STREET  
CLEARFIELD, PA 16830

PROPERTY ID NO.: 4.4-K08-248-00089

TITLE TO SAID PREMISES IS VESTED IN TENA R. JACOX, WIDOW BY DEED FROM ROBERT D. TERRY, A SINGLE INDIVIDUAL DATED 4/4/94 RECORDED 4/5/94 IN DEED BOOK 1596 PAGE 357.

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME TENA R. JACOX NO. 05-1308CD

NOW, June 15, 2006, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on May 05, 2006, I exposed the within described real estate of Tina R. Jacox And Dennis E. Moore to public venue or outcry at which time and place I sold the same to UDREN LAW OFFICES, P.C. he/she being the highest bidder, for the sum of \$1.00 plus costs and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	15.00
SERVICE	15.00
MILEAGE	2.00
LEVY	15.00
MILEAGE	2.00
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	4.44
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	4.00
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	
<b>TOTAL SHERIFF COSTS</b>	<b>\$208.44</b>

**DEED COSTS:**

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	29.00
TRANSFER TAX 2%	0.00
<b>TOTAL DEED COSTS</b>	<b>\$29.00</b>

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	80,728.07
INTEREST @ 16.4400 %	3,140.04
FROM 10/26/2005 TO 05/05/2006	
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>\$83,908.11</b>
<b>COSTS:</b>	
ADVERTISING	415.78
TAXES - COLLECTOR	400.50
TAXES - TAX CLAIM	1,214.88
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	29.00
SHERIFF COSTS	208.44
LEGAL JOURNAL COSTS	198.00
PROTHONOTARY	125.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
<b>TOTAL COSTS</b>	<b>\$2,736.60</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