

05-1607-CD
Mort. Ele. Reg. Vs Guy Kline et al

Mortgage Electronic Regis. Vs Guy R. Kline
2005-1607-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

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

v.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757

NO. 05-1607-CD

Defendant(s)

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

FILED *Attg pd. \$5.00*
m110:43812 CC Shff
OCT 18 2005
WM
William A. Shaw
Prothonotary/Clerk of Courts

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: **N/A**

Assignments of Record to: **N/A**

Recording Date: **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: 416 Lumber City Highway

MUNICIPALITY/TOWNSHIP/BOROUGH: Township of Greenswood

COUNTY: Clearfield

DATE EXECUTED: 06/25/03

DATE RECORDED: 07/10/03 Instru No. 200312070

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 9/20/05:

Principal of debt due	\$44,062.08
Unpaid Interest at 7.8% *	
from 5/5/05	
to 9/20/05	
(the per diem interest accruing on this debt is \$13.20 and that sum should be added each day after 9/20/05)	1,821.60
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Escrow Overdraft/ (Balance) (The monthly escrow on this account is \$56.16 and that sum should be added on the first of each month after 9/20/05)	674.00
Late Charges (monthly late charge of \$16.13 should be added in accordance with the terms of the note each month after 9/20/05)	64.52
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,203.10</u>
TOTAL	\$49,430.30

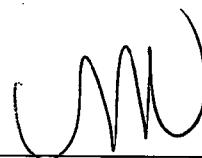
* This interest rate is subject to adjustment as more fully set forth in the Note and Mortgage.

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 \$49,430.30 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



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

ALL THAT PARCEL OF LAND IN THE TOWNSHIP OF GREENWOOD, COUNTY OF CLEARFIELD, STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT STATE HIGHWAY LEADING FROM BELLS LANDING TO LUMBER CITY ON LINE OF LOT NOW OR FORMERLY OF JULIA BELL AND/OR GARDNER; THENCE SOUTH ALONG SAID LOT THREE HUNDRED SIXTY-EIGHT (368') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE WEST ALONG LAND NOW OR FORMERLY OF GEARHART, ONE HUNDRED NINETY-SEVEN (197') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE NORTH ALONG LAND OF FORMER GRANTORS THREE HUNDRED (300') FEET TO STATE HIGHWAY; THENCE EAST ALONG SAID HIGHWAY TWO HUNDRED THIRTY-THREE (233') FEET TO THE PLACE OF BEGINNING. CONTAINING 1 ACRE, MORE OR LESS.

THE GAS AND OIL BEING RESERVED IN FORMER DEEDS.

Homecomings Financial
A GMAC Company

August 09, 2005

Certified Mail, Return Receipt Requested

0436317390
Guy R Kline
416 Lumber City Highway
Clearfield, PA 15757

Re: Property Address: 416 Lumber City Highway
Clearfield, PA 15757

Loan Number: 0436317390

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 **\$ 1,415.58**. That sum includes the following:

3 payments totaling:	\$ 1,295.62
Late charges:	\$ 112.91
Other fees and/or costs	\$ 10.00
Unapplied Funds:	\$ 2.95

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 **\$ 1,415.58** BY **September 08, 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

HLH

*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.

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 IMMEDIATAMENTE LLAMANDA 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: August 09, 2005

TO: Guy R Kline
416 Lumber City Highway
Clearfield, PA 15757

Premises: 416 Lumber City Highway
Clearfield, PA 15757

Re: Loan Number: 0436317390
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:

416 Lumber City Highway , Clearfield, PA 15757

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 06/05/05 to 08/05/05 totaling:	\$ 1,295.62
Late Charges:	\$ 112.91
Other fees and/or costs (including NSF charges and property inspections):	\$ 10.00
LESS: Unapplied Funds:	\$ 2.95
TOTAL	\$ 1,415.58

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 \$ 1,415.58, 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

Homecomings Financial

A GMAC Company

August 09, 2005

Certified Mail, Return Receipt Requested

0436317390
Delbert Kline
416 Lumber City Highway
Clearfield, PA 15757

Re: Property Address: 416 Lumber City Highway
Clearfield, PA 15757

Loan Number: 0436317390

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the letter the total amount due is **\$ 1,193.50**. That sum includes the following:

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Loan Counseling Department

Н.Н.

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ACT 91 NOTICE

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Date: August 09, 2005

TO: Delbert Kline
416 Lumber City Highway
Clearfield, PA 15757

Premises: 416 Lumber City Highway
Clearfield, PA 15757

Re: Loan Number: 0436317390
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

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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:

416 Lumber City Highway , Clearfield, PA 15757

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 06/05/05 to 08/05/05 totaling:	\$ 1,295.62
Late Charges:	\$ 112.91
Other fees and/or costs (including NSF charges and property inspections):	\$ 10.00
LESS: Unapplied Funds:	\$ 2.95
TOTAL	\$ 1,415.58

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 \$ 1,415.58, 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.

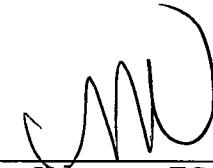
Sincerely,

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 # 100913
NO: 05-1607-CD
SERVICE # 1 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC
VS.

DEFENDANT: GUY R. KLINE ind & as Executor of the Estate of Delbert C. Kline

SHERIFF RETURN

NOW, October 26, 2005 AT 1:38 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON GUY R. KLINE, IND. DEFENDANT AT 416 LUMBER CITY HIGHWAY, MAHAFFEY, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO GUY R. KLINE, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

FILED
FEB 10 2006
WAS
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100913
NO: 05-1607-CD
SERVICE # 2 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC
VS.

DEFENDANT: GUY R. KLINE ind & as Executor of the Estate of Delbert C. Kline

SHERIFF RETURN

NOW, October 26, 2005 AT 1:26 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON GUY R. KLINE, Executor of the Estate of Delbert C. Kline DEFENDANT AT 416 LUMBER CITY HIGHWAY, MAHAFFEY, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO GUY R. KLINE, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DAVIS / MORGILLO

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 100913
NO: 05-1607-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS INC

vs.

DEFENDANT: GUY R. KLINE ind & as Executor of the Estate of Delbert C. Kline

SHERIFF RETURN

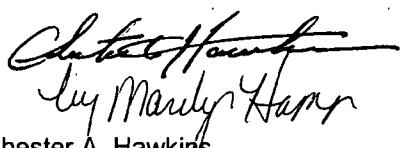
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	45332	20.00
SHERIFF HAWKINS	UDREN	45332	66.68

Sworn to Before Me This

So Answers,

____ Day of _____ 2006


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.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

CD
NO. 05-1607-ES

FILED *Att'y pd.* 2000
M 12 54 01
JUN 12 2006 Notice to Def.
(L) Statement to Att'y
William A. Shaw
Prothonotary/Clerk of Courts

**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) Guy R. Kline, Individually and as Executor of the Estate of Delbert C. Kline 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	\$49,430.30
Interest Per Complaint	3,418.80
From 9/21/05 to 6/6/06	
Late charges per Complaint	129.04
From 9/21/05 to 6/6/06	
Escrow payment per Complaint	<u>505.44</u>
From 9/21/05 to 6/6/06	
 TOTAL	 <u>\$53,483.58</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: 6/12/06

PRO PROTHY

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.

Guy R. Kline, Individually and as
Executor of the Estate of Delbert C.
Kline

NO. 05-1607-cs

Defendant(s)

TO: Guy R. Kline, Individually
and as Executor of the Estate
of Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757

DATE of Notice: January 19, 2006

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. Meholick
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. Meholick
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.

s/
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
856-669-5400

ATTORNEY FOR PLAINTIFF

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

v.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 05-1607-CS

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF NEW JERSEY

:

SS

COUNTY OF CAMDEN

:

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 Servicemembers' Civil Relief Act (108 P.L. 189; 117 Stat. 2835; 2003 Enacted H.R. 100), and that the age and last known residence and employment of each Defendant are as follows:

Defendant: Guy R. Kline, Individually and as Executor
of the Estate of Delbert C. Kline

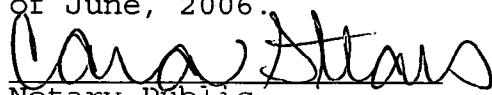
Age: Over 18

Residence: As captioned above

Employment: Unknown

Name: MARK J. UDREN, ESQ.
Title: ATTORNEY FOR PLAINTIFF
Company: UDREN LAW OFFICES, P.C.

Sworn to and subscribed
before me this 6th day
of June, 2006.


Notary Public
CARA STEARS

NOTARY PUBLIC OF NEW JERSEY
Commission Expires 4/16/2008

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.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 05-1607-CS

TO: Guy R. Kline, Individually and as Executor of
the Estate of Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757

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 6/12/06

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

 COPY

Mortgage Electronic Registration Systems, Inc.
Plaintiff(s)

No.: 2005-01607-CD

Real Debt: \$53,483.58

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Guy R. Kline
Delbert C. Kline
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: June 12, 2006

Expires: June 12, 2011

Certified from the record this 12th day of June, 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.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 05-1607-CS D

PRAECIPE FOR WRIT OF EXECUTION

TO THE SHERIFF:

Issue Writ of Execution in the above matter:

Amount due \$53,483.58

Interest From 6/7/06
to Date of Sale

Ongoing Per Diem of \$13.20
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
M 11:04 6/12 2006 ICC&Lewits w/
JUN 12 2006 prop. deser.
WM

William A. Shaw
Prothonotary/Clerk of Courts

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.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

MORTGAGE FORECLOSURE

NO. 05-1607-CS

Defendant(s)

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: 416 Lumber City Highway (Greenswood Township), Clearfield, PA 15757

1. Name and address of Owner(s) or reputed Owner(s):
Name _____ Address _____

Guy R. Kline, Individually 416 Lumber City Highway
and as Executor of the Clearfield, PA 15757
Estate of Delbert C. Kline

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

SAME AS #1 ABOVE

Name _____ Address _____

None

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

Name _____ Address _____

Plaintiff herein. See Caption above.

National City Bank 6750 Miller Road
Brecksville, OH 44141

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

Commonwealth of PA, Bureau of Compliance, PO Box 281230
Department of Revenue 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 416 Lumber City Highway
(Greenswood Township)
Clearfield, PA 15757

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.

Mark J. Udren, ESQ.
Attorney for Plaintiff

DATED: June 6, 2006

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.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757

NO. 05-1607-CS

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

CC BY

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.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757
Defendant(s)

NO. 05-1607-CS

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: 416 Lumber City Highway
(Greenswood Township)
Clearfield, PA 15757
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$53,483.58

Interest From 6/7/06
to Date of Sale
Ongoing Per Diem of \$13.20
to actual date of sale including if sale is
held at a later date

(Costs to be added) \$ 125.00 Prothonotary costs

By Willie J. Chang
Clerk
Date 6/21/06

COURT OF COMMON PLEAS
NO. 05-1607-CS

Mortgage Electronic Registration Systems, Inc.
vs.

Guy R. Kline, Individually and as Executor of the
Estate of Delbert C. Kline

WRIT OF EXECUTION

REAL DEBT \$ 53,483.58

INTEREST \$ _____
from 6/7/06

to Date of Sale
Ongoing Per Diem of \$13.20
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:

416 Lumber City Highway
(Greenswood Township)
Clearfield, PA 15757

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 PARCEL OF LAND IN THE TOWNSHIP OF GREENWOOD, COUNTY OF CLEARFIELD, STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT STATE HIGHWAY LEADING FROM BELLS LANDING TO LUMBER CITY ON LINE OF LOT NOW OR FORMERLY OF JULIA BELL AND/OR GARDNER; THENCE SOUTH ALONG SAID LOT THREE HUNDRED SIXTY-EIGHT (368') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE WEST ALONG LAND NOW OR FORMERLY OF GEARHART, ONE HUNDRED NINETY-SEVEN (197') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE NORTH ALONG LAND OF FORMER GRANTORS THREE HUNDRED (300') FEET TO STATE HIGHWAY; THENCE EAST ALONG SAID HIGHWAY TWO HUNDRED THIRTY-THREE (233') FEET TO THE PLACE OF BEGINNING. CONTAINING 1 ACRE, MORE OR LESS.

THE GAS AND OIL BEING RESERVED IN FORMER DEEDS.

BEING KNOWN AS: 416 LUMBER CITY HIGHWAY
(GREENWOOD TOWNSHIP)
CLEARFIELD, PA 15757

PROPERTY ID NO.: 117-E11-000-00030

TITLE TO SAID PREMISES IS VESTED IN DELBERT C. KLINE, A SINGLE INDIVIDUAL AND GUY R. KLINE, AN INDIVIDUAL, AS JOINT TENANTS WITH THE RIGHT OF SURVIVORSHIP BY DEED FROM DELBERT C. KLINE DATED 6/5/98 RECORDED 6/7/98 IN DEED BOOK 1940 PAGE 39.

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.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Mahaffey, PA 15757
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

CD
NO. 05-1607-~~es~~

PRAECIPE TO AMEND WRIT OF EXECUTION

TO THE SHERIFF:

Kindly amend the Writ of Execution in the above matter to reflect the property address as follows:

416 Lumber City Highway
(Greenswood Township)
Mahaffey, PA 15757

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

FILED

JUN 16 2006 (6)
013401 no cc

William A. Shaw
Prothonotary/Clerk of Courts

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.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Mahaffey, PA 15757
Defendant(s) NO. 05-1607-CS

AMENDED 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:

416 Lumber City Highway
(Greenswood Township)
Mahaffey, PA 15757
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$53,483.58

Interest From 6/7/06 _____
to Date of Sale _____
Ongoing Per Diem of \$13.20
to actual date of sale including if sale is
held at a later date

(Costs to be added) \$ _____

Prothonotary

By John Allen

Date 6.16.06

COURT OF COMMON PLEAS
NO. 05-1607-CS

Mortgage Electronic Registration Systems, Inc.
vs.

Guy R. Kline, Individually and as Executor of the
Estate of Delbert C. Kline

WRIT OF EXECUTION

REAL DEBT \$ 53,483.58

INTEREST \$ _____

from 6/7/06

to Date of Sale _____

Ongoing Per Diem of \$13.20

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

COSTS PAID:

PROTHY \$ _____

SHERIFF \$ _____

STATUTORY \$ _____

COSTS DUE PROTHY. \$ _____

PREMISES TO BE SOLD:

416 Lumber City Highway

(Greenswood Township)

Mahaffey, PA 15757

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

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.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 05-1607-CS

FILED
m 11 2006
SEP 01 2006
S

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: August 29, 2006

BY:

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.

Guy R. Kline, Individually and as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Mahaffey, PA 15757

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

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 Praeclipe for the Writ of Execution was filed the following information concerning the real property located at: 416 Lumber City Highway (Greenswood Township), Mahaffey, PA 15757

Guy R. Kline, Individually 416 Lumber City Highway
and as Executor of the Mahaffey, PA 15757
Estate of Delbert C. Kline

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

SAME AS #1 ABOVE

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

Name _____ Address _____

None

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

Name _____ Address _____

Plaintiff herein. See Caption above.

National City Bank 6750 Miller Road
Brecksville, OH 44141

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 _____

Commonwealth of Pennsylvania 6TH Floor, Strawberry Square
Bureau of Individual Tax Department 280601
Inheritance Tax Division Harrisburg, PA 17128

Department of Public Welfare P.O. Box 8486, Willow Oak Building
TPL Casualty Unit Harrisburg, PA 17105-8486
Estate Recovery Unit

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 416 Lumber City Highway
(Greenswood Township)
Mahaffey, PA 15757

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: August 29, 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

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. 05-1607-CS

v.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Mahaffey, PA 15757
Defendant(s)

DATE: June 21, 2006

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

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

OWNER(S): GUY R. KLINE, INDIVIDUALLY AND AS EXECUTOR OF THE ESTATE
OF DELBERT C. KLINE

PROPERTY: 416 Lumber City Highway, (Greenswood Township)
Mahaffey, PA 15757

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the
Clearfield County Sheriff's Sale on September 1, 2006, at 10:00 am,
at the CLEARFIELD COUNTY COURTHOUSE, 1 NORTH SECOND STREET, SUITE
116, CLEARFIELD, PA 16830. 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

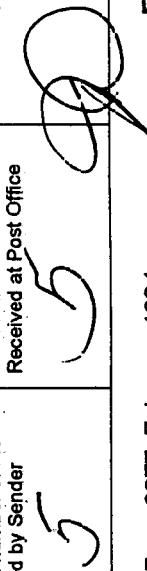
UDREN LAW OFFICES, P.C. WOODCREST CORPORATE CENTER 111 WOODCREST ROAD CHERRY HILL, NEW JERSEY 08003		<input checked="" type="checkbox"/> Registered Mail <input type="checkbox"/> Insured <input type="checkbox"/> COD <input type="checkbox"/> Certified <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> 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>						
Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Act. Value (If Regis.)	Insured Value	Duc. Gender if COD	R.R. Fee	Q.D. Fee	S.H. Fee	Rst. Del. Foo Remarks	
1	KLINE	CLEARFIELD COUNTY REAL ESTATE TAX DEPT. 1 N. 2 ND ST., STE 116, CLEARFIELD, PA 16830										
2		DOMESTIC RELATIONS SECTION 1 N. 2ND ST., STE 116, CLEARFIELD, PA 16830										
3	05090373	PA DEPT OF REV. BUREAU OF COMPLIANCE, P.O. BOX 281230, HARRISBURG, PA 17128-1230										
4		TENANTS OCCUPANTS 416 LUMBER CITY HIGHWAY, (GREENSWOOD TWP) MAHAFFEY, PA 15757										
5	05-1607-CS	NATL CITY BANK 6750 MILLER ROAD, BRECKSVILLE, OH 44141										
6												
7	CLEAR FIELD											
8												
9	HENNI											
10												
11	09/01/2006											
12												
13												
14												
15												
Total number of Pieces Listed by Sender 5		Total Number of Pieces Received at Post Office 5	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 non-negotiable 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 R800, S813, and S821 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 fourth class parcels.</small>			

EXHIBIT A

UDREN LAW OFFICES, P.C. WOODCREST CORPORATE CENTER 111 WOODCREST ROAD CHERRY HILL, NEW JERSEY 08003			<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"/> 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	Fst. Del. Fee	Remarks	
1	KLINE	COM OF PA BUR OF IND TAX INHERITANCE TAX DIV 6 TH FL STRAWBERRY SQ. DEPT 280601, HARRISBURG, PA 17128												
2		DEPT OF PW, TPL CASUALTY UNIT, ESTATE RECOVERY PROG. POB 8486, WILLOW OAK BLDG., HARRISBURG, PA 17105-8486												
3	05090373	IRS FED ESTATE TAX SPECIAL PROCEDURES BRANCH POB 12051, PHILA., PA 19105												
4														
5	05-1607-CS													
6														
7	CLEAR FIELD													
8														
9	HENNI													
10														
11	09/01/2006													
12														
13														
14														
15														
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 place subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise 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.					

EXHIBIT A

SEARCHED

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
CHERRY HILL, NJ 08003



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

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

OFFICIAL USE

5E9E E56T 2000 0TTE 5002
5E9E E56T 2000 0TTE 5002

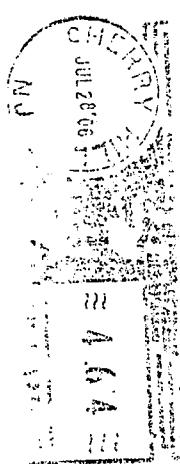
Postage	\$.39
Certified Fee	\$ 2.40
Return Receipt Fee (Endorsement Required)	\$ 1.85
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.64

Postmark
Here

Sent To **INTERNAL REVENUE SERVICE
FEDERAL ESTATE TAX
SPECIAL PROCEDURES BRANCH**
Street, Apt.
or PO Box **P.O. BOX 12051**
City, State, **PHILADELPHIA, PA 19105**

PS Form 3800, June 2002

See Reverse for Instructions



INTERNAL REVENUE SERVICE
FEDERAL ESTATE TAX
SPECIAL PROCEDURE BRANCH
P.O. BOX 12051
PHILADELPHIA, PA 19105

EXHIBIT A

Kline

444C ST!

EXHIBIT A

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:

INTERNAL REVENUE SERVICE
FEDERAL ESTATE TAX
SPECIAL PROCEDURES BRANCH
P.O. BOX 12051
PHILADELPHIA, PA 19105

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Caroline

Agent
 Addressee

Date of Delivery

Caroline Collier 10/8/03

Caroline Collier 10/8/03

B. Received by (Printed Name)

Caroline Collier 10/8/03

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

3. Service Type

Certified Mail
 Registered
 Insured Mail

Express Mail
 Return Receipt for Merchandise
 C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

2. Article Number
(Transfer from service label)

7005 3110 0002 1953 3635

Domestic Return Receipt

PS Form 3811, February 2004

102595-02-M-1540

EXHIBIT A

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20373

NO: 05-1607-CD

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.
vs.

DEFENDANT: GUY R. KLINE, INDIVIDUALLY AND AS EXECUTOR OF THE ESTATE OF DELBERT C. KLINE

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 06/12/2006

LEVY TAKEN 07/03/2006 @ 1:55 PM

POSTED 07/03/2006 @ 1:55 PM

SALE HELD 11/03/2006

FILED
07/08/2006
DEC 08 2006
AM

William A. Shaw
Prothonotary/Clerk of Courts

SOLD TO JP MORGAN 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 12/07/2006

DATE DEED FILED 12/07/2006

PROPERTY ADDRESS 416 LUMBER CITY HIGHWAY MAHAFFEY, PA 16830

SERVICES

07/03/2006 @ 1:55 PM SERVED GUY R. KLINE, INDIVIDUALLY

SERVED GUY R. KLINE, INDIVIDUALLY, DEFENDANT AT HIS RESIDENCE 416 LUMBER CITY HIGHWAY, MAHAFFEY, CLEARFIELD COUNTY,
PENNSYLVANIA BY HANDING TO GUY R. KLINE

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

07/03/2006 @ 1:55 PM SERVED GUY R. KLINE, EXE. THE ESTATE OF DELBERT C. KLINE

SERVED GUY R. KLINE, EXECUTOR OF THE ESTATE OF DELBERT C. KLINE, DEFENDANT, AT HIS RESIDENCE 416 LIMBER CITY
HIGHWAY, MAHAFFEY, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO GUY R. KLINE

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

@ SERVED

NOW, AUGUST 30, 2006 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED
FOR SEPTEMBER 1, 2006 TO NOVEMBER 3, 2006.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20373
NO: 05-1607-CD

PLAINTIFF: MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC.

vs.

DEFENDANT: GUY R. KLINE, INDIVIDUALLY AND AS EXECUTOR OF THE ESTATE OF DELBERT C. KLINE

Execution REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS \$246.01

SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This

So Answers,

____ Day of _____ 2006


By 
Chester A. Hawkins

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

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

v.

Guy R. Kline, Individually and
as Executor of the Estate of
Delbert C. Kline
416 Lumber City Highway
Mahaffey, PA 15757
Defendant(s)

NO. 05-1607-CS

COPY

AMENDED 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:

416 Lumber City Highway
(Greenswood Township)
Mahaffey, PA 15757
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$53,483.58

(Costs to be added) \$ _____

Prothonotary

By John F. Linnihan

Clerk

Received April 16, 1916 @ 3:30 P.M.
Chester A. Hawkins
by ~~Amelia~~ Butter-Aghbolagh

COURT OF COMMON PLEAS
NO. 05-1607-CS

=====

Mortgage Electronic Registration Systems, Inc.
vs.

Guy R. Kline, Individually and as Executor of the
Estate of Delbert C. Kline

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 53,483.58

INTEREST \$ _____

from 6/7/06
to Date of Sale _____
Ongoing Per Diem of \$13.20
to actual date of sale including if sale is
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COSTS PAID:

PROTHY \$ _____

SHERIFF \$ _____

STATUTORY \$ _____

COSTS DUE PROTHY. \$ _____

PREMISES TO BE SOLD:

416 Lumber City Highway
(Greenswood Township)
Mahaffey, PA 15757

Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
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UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
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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.

Guy R. Kline, Individually and
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Delbert C. Kline
416 Lumber City Highway
Clearfield, PA 15757
Defendant(s)

NO. 05-1607-CS

WRIT OF EXECUTION

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Clearfield, PA 15757
SEE LEGAL DESCRIPTION ATTACHED

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to Date of Sale
Ongoing Per Diem of \$13.20
to actual date of sale including if sale is
held at a later date

(Costs to be added) \$ 125.00 Prothonotary costs

By Willie L. Harkay
Prothonotary
Clerk

Date 6/12/06

Received June 12, 2006 @ 2:00 P.M.
Chester A. Wrenhals
By Captain Butcher-Angelina

COURT OF COMMON PLEAS
NO. 05-1607-CS

=====

Mortgage Electronic Registration Systems, Inc.
vs.

Guy R. Kline, Individually and as Executor of the
Estate of Delbert C. Kline

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 53,483.58

INTEREST \$ _____

from 6/7/06

to Date of Sale _____

Ongoing Per Diem of \$13.20

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:

416 Lumber City Highway

(Greenswood Township)

Clearfield, PA 15757

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 PARCEL OF LAND IN THE TOWNSHIP OF GREENWOOD, COUNTY OF CLEARFIELD, STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT STATE HIGHWAY LEADING FROM BELLS LANDING TO LUMBER CITY ON LINE OF LOT NOW OR FORMERLY OF JULIA BELL AND/OR GARDNER; THENCE SOUTH ALONG SAID LOT THREE HUNDRED SIXTY-EIGHT (368') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE WEST ALONG LAND NOW OR FORMERLY OF GEARHART, ONE HUNDRED NINETY-SEVEN (197') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE NORTH ALONG LAND OF FORMER GRANTORS THREE HUNDRED (300') FEET TO STATE HIGHWAY; THENCE EAST ALONG SAID HIGHWAY TWO HUNDRED THIRTY-THREE (233') FEET TO THE PLACE OF BEGINNING. CONTAINING 1 ACRE, MORE OR LESS.

THE GAS AND OIL BEING RESERVED IN FORMER DEEDS.

BEING KNOWN AS: 416 LUMBER CITY HIGHWAY
(GREENSWOOD TOWNSHIP)
CLEARFIELD, PA 15757

PROPERTY ID NO.: 117-E11-000-00030

TITLE TO SAID PREMISES IS VESTED IN DELBERT C. KLINE, A SINGLE INDIVIDUAL AND GUY R. KLINE, AN INDIVIDUAL, AS JOINT TENANTS WITH THE RIGHT OF SURVIVORSHIP BY DEED FROM DELBERT C. KLINE DATED 6/5/98 RECORDED 6/7/98 IN DEED BOOK 1940 PAGE 39.

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME GUY R. KLINE, INDIVIDUALLY NO. 05-1607-CD

NOW, December 07, 2006, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on November 03, 2006, I exposed the within described real estate of Guy R. Kline, Individually And As Executor Of The Estate Of Delbert C. Kline to public venue or outcry at which time and place I sold the same to JP MORGAN CHASE BANK AS TRUSTEE (MERS IS ACTING/HAS ACTED AS THE AGENT FOR THE REAL PARTY IN INTEREST OR BENEFICIAL OWNER) he/she being the highest bidder, for the sum of \$1.00 plus costs and made the following appropriations, viz:

SHERIFF COSTS:

PLAINTIFF COSTS, DEBT AND INTEREST:

RDR	15.00	DEBT-AMOUNT DUE	53,483.58
SERVICE	15.00	INTEREST @ 13.2000 %	1,966.80
MILEAGE	19.58	FROM 06/07/2006 TO 11/03/2006	
LEVY	15.00		
MILEAGE	19.58	PROTH SATISFACTION	
POSTING	15.00	LATE CHARGES AND FEES	
CSDS	10.00	COST OF SUIT-TO BE ADDED	
COMMISSION	0.00	FORECLOSURE FEES	
POSTAGE	5.85	ATTORNEY COMMISSION	
HANDBILLS	15.00	REFUND OF ADVANCE	
DISTRIBUTION	25.00	REFUND OF SURCHARGE	
ADVERTISING	15.00	SATISFACTION FEE	40.00
ADD'L SERVICE		ESCROW DEFICIENCY	
DEED	30.00	PROPERTY INSPECTIONS	
ADD'L POSTING		INTEREST	
ADD'L MILEAGE		MISCELLANEOUS	
ADD'L LEVY			
BID AMOUNT	1.00	TOTAL DEBT AND INTEREST	\$55,490.38
RETURNS/DEPUTIZE			
COPIES	15.00		
	5.00		
BILLING/PHONE/FAX	5.00		
CONTINUED SALES	20.00		
MISCELLANEOUS			
TOTAL SHERIFF COSTS	\$246.01	COSTS:	
DEED COSTS:			
ACKNOWLEDGEMENT	5.00	ADVERTISING	376.90
REGISTER & RECORDER	29.00	TAXES - COLLECTOR	552.78
TRANSFER TAX 2%	0.00	TAXES - TAX CLAIM	632.43
TOTAL DEED COSTS	\$29.00	DUE	
		LIEN SEARCH	200.00
		ACKNOWLEDGEMENT	5.00
		DEED COSTS	29.00
		SHERIFF COSTS	246.01
		LEGAL JOURNAL COSTS	180.00
		PROTHONOTARY	125.00
		MORTGAGE SEARCH	80.00
		MUNICIPAL LIEN	
		TOTAL COSTS	\$2,427.12

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

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
SUITE 200

CHERRY HILL, NEW JERSEY 08003-3620
856 . 669 . 5400
FAX: 856 . 669 . 5399

PENNSYLVANIA OFFICE
215-568-9500

MARK J. UDREN*
STUART WINNEG**
GAYL SPIVAK ORLOFF***
HEIDI R. SPIVAK***
MARISA JOY COHEN***
LORRAINE DOYLE**
ALAN M. MINATO***
*ADMITTED NJ, PA, FL
**ADMITTED PA
***ADMITTED NJ, PA
TINA MARIE RICH
OFFICE ADMINISTRATOR

**FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL**

PLEASE RESPOND TO NEW JERSEY OFFICE

August 30, 2006

Sent via telefax #814-765-5915
and Regular Mail

Clearfield County Sheriff's Office
Clearfield County Courthouse
1 North Second Street
Suite 116
Clearfield, PA 16830
ATTN: CINDY

Re: Mortgage Electronic Registration Systems, Inc.
vs.

Guy R. Kline, Individually and as Executor of the Estate of
Delbert C. Kline
Clearfield County C.C.P. No. 05-1607-CS
Premises: 416 Lumber City Highway (Greenswood Township)
Clearfield, PA 15757
SS Date: SEPTEMBER 1, 2006

Dear CINDY:

Please POSTPONE the Sheriff's Sale scheduled for SEPTEMBER 1, 2006
to NOVEMBER 3, 2006.

Sale is POSTPONED for the following reason:

POSSIBLE PAY OFF.

Thank you for your attention to this matter.

Sincerely yours,

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

/jjh