

06-666-CD
Washington Mutual vs V. DeChurch et al

2006-666-CD
Washington Mutual vs Vincie DeChurch et al

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

Washington Mutual Bank, FA
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120
Plaintiff
v.

Vince A. DeChurch, Jr. a/k/a
Vincent A. DeChurch, Jr., Last
Record Owner
Deborah L. DeChurch
517 Locust Street
Dubois, PA 15801
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

NO. 2006-666-C.D

FILED

MAY 01 2006
m/ 8:30 AM
William A. Shaw
Prothonotary/Clerk of Courts
4 CENTS TO S.H.E.F.

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.

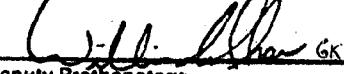
LAWYERS REFERRAL SERVICE
David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

FILED

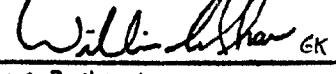
MAY 01 2006

William A. Shaw
Prothonotary/Clerk of Courts

Aug. 15, 2006 Document
Reinstated/Reissued to Sheriff/Attorney
for service.


Deputy Prothonotary

Sept 18, 2006 Document
Reinstated/Reissued to Sheriff/Attorney
for service.


Deputy Prothonotary

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. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641 x 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: PNC Mortgage Corp. of America
Assignments of Record to: Washington Mutual Bank, FA
Recording Date: **LODGED FOR RECORDING**

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: 339 Treasure Lake
MUNICIPALITY/TOWNSHIP/BOROUGH: Sandy Township
COUNTY: Clearfield
DATE EXECUTED: 4/29/99
DATE RECORDED: 4/29/99 INSTRUMENT #: 199906734
MORTGAGE MODIFICATION RECORDED: 6/29/05
INSTRUMENT #: 200509743

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 4/1/06:

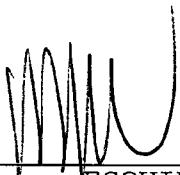
Principal of debt due	\$92,922.74
Unpaid Interest at 6.75% from 10/1/05 to 4/1/06 (the per diem interest accruing on this debt is \$17.18 and that sum should be added each day after 4/1/06)	3,136.14
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Escrow Overdraft/ (Balance) (The monthly escrow on this account is \$242.78 and that sum should be added on the first of each month after 4/1/06)	(480.12)
Late Charges (monthly late charge of \$36.00 should be added in accordance with the terms of the note each month after 4/1/06)	180.00
MIP	65.80
Recoverable Balance	782.50
Attorneys Fees (anticipated and actual to 5% of principal)	<u>4,646.14</u>
TOTAL	\$101,858.20

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. Notice of Intention to Foreclose under Act 6 of 1974 of the Commonwealth of Pennsylvania has been sent to each Defendant,

certified mail, in accordance with the requirements of that act, and copy(s) are attached hereto as Exhibit "A" and made part hereof. The notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983, has not been sent because the Mortgage is insured by the Federal Housing Administration ("FHA") and the notice is therefore not required.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$101,858.20 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 certain tracts of land designated as Lots Nos. 146 and 147, Section 15, "Bimini" in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Office in Misc. Docket Map File No. 25.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declaration of Restrictions, Treasure Lake, Inc., recorded in Misc. Book Vol. 146, page 476; all of said restrictions being covenants which run with the land.
3. All mineral and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Developer, or Treasure Lake Property Owners Association, Inc., which lien shall run with the land and be an encumbrance against it.

BEING the same premises which became vested in the Mortgagors herein by deed of James R. Hendricks and Annette M. Hendricks, dated October 30, 1998 and not yet recorded but intended to be prior to the recording of this mortgage.

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
215-568-1141 FAX

MARK J. UDREN*
STUART WINNEG**
GAYL SPIVAK ORLOFF***
HEIDI R. SPIVAK***
MARISA JOY MYERS***
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

March 24, 2006

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ARTICLE #7005 3110 0002 1954 2255
7005 3110 0002 1954 2293
7005 3110 0002 1954 2286
7005 3110 0002 1954 2279

Vince A DeChurch
Deborah L DeChurch
339 Treasure Lake
DeBois PA 15801

Re: Servicer/Mortgagee Washington Mutual
Mortgagor Jacqueline Binder
Loan No. 6161456550
Premises: 339 Treasure Lake
DeBois PA 15801

NOTICE OF DEFAULT AND INTENTION TO TAKE ACTION

Dear Borrower(s):

Washington Mutual, is the holder or servicer of your Promissory Note and Mortgage on the above premises (339 Treasure Lake DeBois PA 15801) securing the Note. You are in default of certain obligations under these documents as follows:

You have failed to make payments in the amount of \$899.95 for November 1, 2005 and you have failed to make payments thereafter.

Failure to cure the default as specified may result in acceleration of the sums secured by your Mortgage, foreclosure by judicial proceedings and sale of the Premises.

EXHIBIT A

You can avoid the above actions by making payment to us of \$5528.05, which includes all accrued late charges, costs, and attorney's fees incurred to date. Payment must be made either by cash, cashier's check, certified check or money order. If we do not receive your payment in full by April 1, 2006, you must also add an additional \$899.95 for the monthly payment due. If we do not receive your payment by April 15, 2006, you must add an additional late charge of \$36.00.

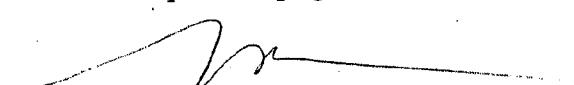
If your mortgage so provides, you have the right to reinstate after acceleration and the right to assert in the foreclosure proceedings the non-existence of a default or any other defense to acceleration and foreclosure.

Only if your Mortgage so provides, notwithstanding acceleration of the sums secured by the Mortgage, you shall have the right to have any proceedings begun by us to enforce the Mortgage discontinued anytime prior to at least one hour prior to the commencement of bidding at a Sheriff's sale or other sale pursuant to the Mortgage, if you comply with its requirements allowing such reinstatement.

You may cure your default by making payment of the amounts indicated above to us at the address on the letterhead.

I urge you to contact the undersigned promptly upon receipt of this letter.

Very truly yours,



MARK J. UDREN, ESQUIRE

MJU/tmr
cc: First Class Mail

NOTICE

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**UDREN LAW OFFICES P.C.
/s/ Mark J. Udren, Esquire
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 669-6900**

Cherry Hill Referrals

Udren Law Offices, PC
Woodcrest Corporate Center
111 Woodcrest Road
Suite 200
Cherry Hill, NJ 08003



CERTIFIED MAIL™

PLEASE STICKER AT TOP OF ENVELOPE OR BAG. PRINT OR TYPE IN BLOCK LETTERS.

Unknown Heirs of:
Vince A. DeChurch (deceased)
339 Treasure Lake
DeBois, PA 15801

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

Postage	\$ 39
Certified Fee	240
Return Receipt Fee (Endorsement Required)	185
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 464

Postmark
Here

Sent to unknown Heirs of
Vince A DeChurch (deceased)
Street, Apt. No.
or PO Box No. 339 Treasure Lake
City, State, ZIP 15801
PS Form 3800, June 2002. See Reverse for Instructions



SENDER: COMPLETE THIS SECTION

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

COMPLETE THIS SECTION ON DELIVERY

X A. Signature	
B. Received by (Printed Name)	
C. Date of Delivery	
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	

Certified Mail Provides:

in 3800, June 2002 (Reverse)

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>		<p>1. Article Addressed to:</p> <p>UNKNOWN HERS OF Vince A. DeChurch (handwritten)</p>	
<p>2. Article Number <i>(Transfer from service label)</i></p> <p>389 Treasure Lake Deb's, PA 15801</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by / (Printed Name) <input checked="" type="checkbox"/> X</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>7005 3110 0002 1954 2279</p>			
<p>Domestic Return Receipt</p>			

000002 Referrals

Udren Law Offices, PC
Woodcrest Corporate Center
111 Woodcrest Road
Suite 200
Cherry Hill, NJ 08003

Unknown Heirs of:
Vince A. DeChurch (deceased)
517 Locust Street
DeBois, PA 15801



**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

Postage	\$ 39
Certified Fee	240
Return Receipt Fee (Endorsement Required)	185
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 464

Postmark
Here

*Sent To: Unknown Heirs of
Vince A. DeChurch (deceased)
Street, Apt. No.
or PO Box No. 517 Locust Street
City, State, ZIP 45801
DeBois, PA 15801*

PS Form 3800, June 2002
See Reverse for Instructions

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ 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. 		<p>1. Article Addressed to:</p> <p><i>WILLIAM HARRIS OF VINE A. DECHURCH (deceased)</i></p> <p>517 LOCUST STREET PHILA, PA 19101</p> <p>2. Article Number (Transfer from service label) 7005 3110 0002 1954 2255</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D. <input type="checkbox"/> Insured Mail <input type="checkbox"/> Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes </p> <p>4. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>Certified Mail Provides:</p> <ul style="list-style-type: none"> ■ A mailing receipt for your mailpiece ■ A record of delivery kept by the Postal Service for two years ■ Certified Mail is not available for any class of international mail. ■ Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail. ■ NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. ■ Delivery to return recipient is free. ■ Delivery to original recipient, please complete and attach a Return Receipt Form 3611 to the article and add applicable postage to cover the additional fee. ■ For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mailpiece with the address "Certified Mail Delivery". ■ If a postmark is desired, please present the Certified Mail receipt to the post office for postmarking. If a postmark is present on the Certified Mail receipt it is not needed, detach and affix label with postage and mail. ■ If a postmark is present on the Certified Mail receipt and present it when mailing an inquiry, internet access to APDs and PDFs. <p>IMPORTANT: Save this receipt and present it when mailing an inquiry.</p>			

Udren Law Offices, PC
Woodcrest Corporate Center
111 Woodcrest Road
Suite 200
Cherry Hill, NJ 08003

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

CERTIFIED MAIL™

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

Postage	\$ 29
Certified Fee	240
Return Receipt Fee (Endorsement Required)	185
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 488

Postmark
Here

Sent To Vince A DeChurch (dechurch)
Street, Apt. No.: 517 Locust Street
or PO Box No.:
City, State, ZIP 4
Detroit MI 15201

PS Form 3800, June 2002

See Reverse for Instructions

Vince A. DeChurch (deceased)
517 Locust Street
DeBois, PA 15801

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Over 3000 Receipts

Udren Law Offices, PC
Woodcrest Corporate Center
111 Woodcrest Road
Suite 200
Cherry Hill, NJ 08003



**U.S. Postal Service™
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OFFICIAL USE	
Postage	\$ 39
Certified Fee	240
Return Receipt Fee (Endorsement Required)	185
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 464

Postmark
Here

Sent To Deborah L. DeChurch
Street, Apt. No.: 517 Locust Street
or PO Box No.
City, State, ZIP: DeBois, PA 15801

PS Form 3800, June 2002
See Reverse for Instructions

Deborah L. DeChurch
517 Locust Street
DeBois, PA 15801

COMPLETE THIS SECTION ON DELIVERY	
SENDER: COMPLETE THIS SECTION	
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>	
<p>1. Article Addressed to:</p> <p>Deborah L. DeChurch 517 Locust Street DUBOIS, PA 15801</p>	
<p>A. Signature X</p>	
<p>B. Received by (Printed Name)</p>	
<p>C. Date of Delivery</p>	
<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>If YES, enter delivery address below: </p>	
<p>3. Service Type</p>	
<p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p>	
<p><input checked="" type="checkbox"/> Registered Mail <input type="checkbox"/> Return Receipt for Merchandise</p>	
<p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

Certified Mail Provides:

- A mailing receipt

Form 3800, June 2002 (Reverse)

- **IMPORTANT:** Save this receipt and present it when making an inquiry or reporting a loss.
- Certified Mail is not available for any class of international mail.
- **NO INSURANCE COVERAGE IS PROVIDED WITH CERTIFIED MAIL.** Valuables, please consider insured or registered mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Form 3811 to the article and add applicable postage to cover the fee. Endorsements, signatures, and initials on the Return Receipt are not required.
- For an additional fee, a Return Receipt may be requested to attach a Return Receipt to the article and add applicable postage to cover the fee. Endorsements, signatures, and initials on the Return Receipt are not required.
- For an additional fee, a Return Receipt may be requested to attach a Return Receipt to the article and add applicable postage to cover the fee. Endorsements, signatures, and initials on the Return Receipt are not required.
- **FOR ADDITIONAL FEES, ADDRESSEES MAY BE REQUESTED TO THE ADDRESSEE'S BUSINESS ADDRESS.** Addressee, advise the clerk or mark the mailpiece with "Business Delivery".
- **FOR AN ADDITIONAL FEES, DELIVERY MAY BE REQUESTED TO THE ADDRESSEE'S BUSINESS ADDRESS.** Addressee, advise the clerk or mark the mailpiece with "Business Delivery".
- **IF A POSTMASTER IS NOT NEEDED, DETAIL THE CERTIFIED MAIL RECEIPT AND ATTACH LABEL WITH POSTAGE AND MAIL.** If a postmaster is desired, please present the e-mail address of the addressee on the Certified Mail receipt.
- **IF A POSTMASTER IS DESIRED, PLEASE PRESENT THE E-MAIL ADDRESS OF THE ADDRESSEE ON THE CERTIFIED MAIL RECEIPT.** If a postmaster is not needed, detail the Certified Mail receipt and attach label with postage and mail.
- **IMMEDIATE ACCESS TO APQS AND FPO'S.** Immediate access to delivery information is not available on inquiry or request.

2. Article Number
(Transfer from service label)
PS Form 3811, February 2001

2. Article Number
(Transfer from service label)
PS Form 3811, February 2000

2286 3730 0002 1954 2286

102595-02-M-154C

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.

FILED
MAY 01 2008
William A. Shaw
Prothonotary/Clerk of Courts

MARK J. UDREN & ASSOCIATES
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
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

JULY 3 2006

COURT ADMINISTRATION
OFFICE

Washington Mutual Bank, FA
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120
Plaintiff

v.
Vince A. DeChurch, Jr. a/k/a Vincent
A. DeChurch, Jr., Last Record Owner
Deborah L. DeChurch
517 Locust Street
Dubois, PA 15801
Defendants

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2006-666-CD

MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S MOTION FOR SERVICE
PURSUANT TO SPECIAL ORDER OF COURT

Plaintiff, Washington Mutual Bank, FA, having filed its Motion For Service Pursuant To Special Order of Court, submits this Memorandum of Law in support hereof.

Pennsylvania Rule of Civil Procedure 430(a) specifically provides, in part, that "If service cannot be made under the applicable rule, the plaintiff may move the court for a special order directing the method of service".

The purpose of the Motion is to seek special service of the Complaint In Mortgage Foreclosure on Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, and the Unknown Heirs of Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner. It is believed that there may be heirs of the deceased Defendant, yet they are unknown to the Plaintiff. Therefore, because the heirs are "unknown", and thus unidentifiable and unable to be located, service cannot be made under the applicable rule.

Pennsylvania Rule of Civil Procedure 1144(a) (2) requires the Plaintiff to name as party Defendants in an action in mortgage foreclosure the heirs of a deceased mortgagor. Pa.R.C.P. 1144(a) (3) is silent with regard to the heirs of a deceased real owner. As stated in the attached Motion, Defendant, Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, is deceased.

So as to properly satisfy Pa.R.C.P. 1144(a) (2), (a) (3), a good faith effort to discover the whereabouts of any and all heirs has been made in accordance with Pa.R.C.P. 430(a), as evidenced by the good faith Affidavit of Investigation, attached hereto as Exhibit "B".

Known heirs may have been identified herein. However, so as to properly serve Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, and any surviving heirs who are unknown to the Plaintiff, but who may have have an interest in the mortgaged premises, the Plaintiff seeks service by publication with regard to the Complaint in Mortgage Foreclosure, and posting only, of the mortgaged premises with regard to all subsequent pleadings that require personal service, including, *inter alia*, the Notice of Sheriff's Sale.

Pa.R.C.P. 430(b) (1) provides for service by publication.

Further, Pa.R.C.P. 430(b) (2) provides for service by publication on unknown heirs:

When service is made by publication upon the heirs and assigns of a named former owners or party in interest, the court may permit publication against the heirs or assigns generally if it is set forth in the complaint or an affidavit that they are unknown.

In conformity with Pa.R.C.P. 430(b) (2), the Plaintiff sets forth, as verified, in the within Motion, that there may be unknown heirs.

In order to complete service on the Defendant, Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, by and through his surviving "unknown heirs", so as to move this foreclosure action forward to ultimate disposition, the Plaintiff

5. There may be other "Unknown" surviving heirs.
6. Plaintiff has made a good faith effort to locate all known heirs so as to name them party Defendants pursuant to Pa.R.C.P. 1144(a)(2) by inquiring with the Clearfield County Register of Wills Office and conducting a skip trace.
7. Although specific heirs may have been located, it is believed that there may be other "unknown heirs", who remain unidentified.

WHEREFORE, so as to properly satisfy the Pennsylvania Rules of Court, particularly Pa.R.C.P. 1144(a)(2), (a)(3), where the Plaintiff is required to name as party Defendants in an action in mortgage foreclosure the heirs of a deceased mortgagor, if known, and those of a deceased real owner, the Plaintiff moves this Honorable Court, and hereby requests an Order, pursuant to Pa.R.C.P. 430 et seq., directing service of the Complaint In Mortgage Foreclosure by publication upon the Defendant, Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, and the Unknown Heirs of Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner; and service of any and all subsequent pleadings including, inter alia, the Notice of Sheriff's Sale, that require personal service by posting only, of the subject premises located at 339 Treasure Lake, Dubois, PA 15801.

UDREN LAW OFFICES, P.C.

Mark J. Udren, Esquire
Attorney for Plaintiff

MARK J. UDREN & ASSOCIATES
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
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

RECEIVED

JUN 28 2006

COURT ADMINISTRATIVE
OFFICE

Washington Mutual Bank, FA
Plaintiff

v.

Vince A. DeChurch, Jr. a/k/a Vincent
A. DeChurch, Jr., Last Record Owner
Deborah L. DeChurch
Defendants

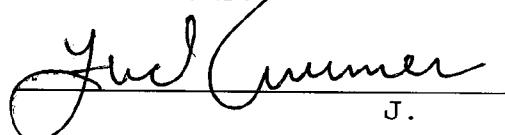
COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2006-666-CD

O R D E R

AND NOW, this 29th Day of June, 2006, upon consideration of Plaintiff's Motion For Service Pursuant To Special Order Of Court, and any response thereto, it is hereby ORDERED AND DECREED that Service of the Complaint In Mortgage Foreclosure on Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, and upon any and all Unknown Heirs of Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, shall be complete when Plaintiff or its counsel or agent has published in accordance with Pa.R.C.P. 430(b)(1) a Notice of the action once in the local legal publication and once in a newspaper of general circulation within the County; and, pursuant to Pa.R.C.P. 430, service of all subsequent pleadings that require personal service, including, inter alia, the Notice of Sheriff's Sale, shall be complete when the Sheriff, competent adult, constable, or other appropriate party has posted only, a copy of said subsequent pleadings and/or Notice on the most public part of the property located at: 339 Treasure Lake, Dubois, PA 15801, which is the subject matter of this action in mortgage foreclosure.

BY THE COURT:


J.

FILED ^{cc}
04/00/06 Atty Udren
JUN 29 2006
(6)

William A. Shaw
Prothonotary/Clerk of Courts

FILED

JUN 29 2006

William A. Shaw
Prothonotary/Clerk of Courts

MARK J. UDREN & ASSOCIATES
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
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

FILED NO CC

3111601
JUN 28 2006 G

William A. Shaw
Prothonotary/Clerk of Courts

Washington Mutual Bank, FA
Plaintiff

v.
Vince A. DeChurch, Jr. a/k/a Vincent
A. DeChurch, Jr., Last Record Owner
Deborah L. DeChurch
Defendants

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2006-666-CD

MOTION FOR SERVICE PURSUANT TO SPECIAL ORDER OF COURT

Plaintiff, by its counsel, Mark J. Udren, Esquire, moves this Honorable Court for an Order directing service of the Complaint In Mortgage Foreclosure by publication in accordance with Pennsylvania Rule of Civil Procedure (Pa.R.C.P.) 430(b)(1); and service of all subsequent pleadings, including, *inter alia*, the Notice of Sheriff's sale, that requires personal service upon Defendant, Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, and Unknown Heirs of Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, by posting only, of the subject premises located at 339 Treasure Lake, Dubois, PA 15801 in accordance with Pa.R.C.P. 430; and in support thereof avers the following:

1. Plaintiff filed a Complaint in Mortgage Foreclosure against the above captioned Defendant.

2. The Defendant, Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, is deceased. A true and correct copy of Proof of Death is attached hereto and marked Exhibit "A".

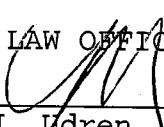
3. The Plaintiff inquired with the Clearfield County Register of Wills Office and was advised that the County has no record of an Estate having been raised.

4. There are no "known" surviving heirs other than those which may have been previously identified and named as defendants.

5. There may be other "Unknown" surviving heirs.
6. Plaintiff has made a good faith effort to locate all known heirs so as to name them party Defendants pursuant to Pa.R.C.P. 1144(a)(2) by inquiring with the Clearfield County Register of Wills Office and conducting a skip trace.
7. Although specific heirs may have been located, it is believed that there may be other "unknown heirs", who remain unidentified.

WHEREFORE, so as to properly satisfy the Pennsylvania Rules of Court, particularly Pa.R.C.P. 1144(a)(2), (a)(3), where the Plaintiff is required to name as party Defendants in an action in mortgage foreclosure the heirs of a deceased mortgagor, if known, and those of a deceased real owner, the Plaintiff moves this Honorable Court, and hereby requests an Order, pursuant to Pa.R.C.P. 430 et seq., directing service of the Complaint In Mortgage Foreclosure by publication upon the Defendant, Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, and the Unknown Heirs of Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner; and service of any and all subsequent pleadings including, inter alia, the Notice of Sheriff's Sale, that require personal service by posting only, of the subject premises located at 339 Treasure Lake, Dubois, PA 15801.

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire
Attorney for Plaintiff

This is to certify that this is a true and accurate copy of the death record on file with the Division of Vital Records, and that I, Charles Hardester, am and was at the time of the issuance of this copy Director, Division of Vital Records of the Department of Health for the Commonwealth of Pennsylvania, duly appointed and commissioned as directed by Act 66 of the General Assembly, approved 29 June 1953, P.L. 304.

JUN 12 2006

Date Issued

Charles Hardester

Director

H105.144 Rev. 1/91

COMMONWEALTH OF PENNSYLVANIA • DEPARTMENT OF HEALTH • VITAL RECORDS
CERTIFICATE OF DEATH
(Coroner)

Final Certificate

107878

TYPE/PRINT
IN
PERMANENT
BLACK INK

DECEDENT PERSONAL DATA		NAME OF DECEDENT (First, Middle, Last)				SEX	SOCIAL SECURITY NUMBER	STATE FILE NUMBER	DATE OF DEATH (Month, Day, Year)
		1. VINCENT A. DeChurch Jr.	2. male	3. 008-42-7960	4. Oct 7, 2005				
AGE (Last Birthday)		UNDER 1 YEAR	UNDER 1 DAY	DATE OF BIRTH (Month, Day, Year)	BIRTHPLACE (City and State or Foreign Country)	PLACE OF DEATH (Check only one — see instructions on other side)			
Months Days		Hours Minutes		APRIL 23 1955	DuBois PA	HOSPITAL: <input type="checkbox"/> Inpatient <input checked="" type="checkbox"/> ER/Outpatient <input type="checkbox"/> DGA <input type="checkbox"/> Ba.	OTHER: <input type="checkbox"/> Nursing Home <input type="checkbox"/> Residence <input type="checkbox"/> Other (Specify) <input type="checkbox"/>		
5. 50 Yrs.						Was DECEDENT OF HISPANIC ORIGIN? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> If yes, specify Cuban, Mexican, Puerto Rican, etc.			
COUNTY OF DEATH		CITY, BORO, TWP OF DEATH		FACILITY NAME (If not institution, give street and number)		RACE - American Indian, Black, White, etc. (Specify) <input type="checkbox"/> 10. white			
6. Clearfield		DuBois		DuBois Regional Medical Ctr.		SURVIVING SPOUSE (If wife, give maiden name) <input type="checkbox"/> 15. Deborah L. Rankes			
DECEDENT'S USUAL OCCUPATION (Give kind of work done during most of working life; do not use retired)		KIND OF BUSINESS/INDUSTRY		WAS DECEDENT EVER IN U.S. ARMED FORCES? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 12.	DECEDENT'S EDUCATION (Specify only highest grade completed)	MARITAL STATUS - Married <input type="checkbox"/> Never Married, Widowed, Divorced (Specify) <input type="checkbox"/> 14. MARRIED	17a. State: PA Did decedent live in a township? <input checked="" type="checkbox"/> Yes, decedent lived in SANDY <input type="checkbox"/> No, decedent lived within actual limits of city/boro <input type="checkbox"/>		
7. BROKER		11b. INSURANCE			Elementary/Secondary (0-12) <input type="checkbox"/> 13. 12	College (1-4 or 5+) <input type="checkbox"/>	17b. County: Clearfield		
DECEDENT'S MAILING ADDRESS (Street, City/Town, State, Zip Code)		DECEDENT'S ACTUAL RESIDENCE (See instructions on other side)		17a. State: PA	17c. <input type="checkbox"/> Yes, decedent lived in SANDY <input type="checkbox"/> No, decedent lived within actual limits of city/boro <input type="checkbox"/>				
16. 339 TREASUR LAKE DuBois PA				17b. County: Clearfield					
FATHER'S NAME (First, Middle, Last)		18. Vincent A. DeChurch Sr.		MOTHER'S NAME (First, Middle, Maiden Name) <input type="checkbox"/> 19. Barbara L. Neurill					
INFORMANT'S NAME (Type/Print)		18. DeORAH DeChurch		INFORMANT'S MAILING ADDRESS (Street, City/Town, State, Zip Code) <input type="checkbox"/> 20. 339 T.L. DuBois PA 15801					
METHOD OF DISPOSITION Burial <input type="checkbox"/> Cremation <input checked="" type="checkbox"/> Removal from State <input type="checkbox"/> Other (Specify) <input type="checkbox"/> 21.		DATE OF DISPOSITION (Month, Day, Year) <input type="checkbox"/> 21b. Oct. 11, 2005		PLACE OF DISPOSITION - Name of Cemetery, Crematory or Other Place <input type="checkbox"/> 21c. Northwestern PA Crematory		LOCATION - City/Town, State, Zip Code <input type="checkbox"/> 21d. Clarion PA 16214			
SIGNATURE OF FUNERAL SERVICE LICENSEE OR PERSON ACTING AS SUCH <i>Vincent A. DeChurch</i>		LICENSE NUMBER <input type="checkbox"/> 22b. C13700-L		NAME AND ADDRESS OF FACILITY <input type="checkbox"/> 22c. Gable-Barwick F.H. 211 S. Main St. DuBois, PA 15801		DATE SIGNED (Month, Day, Year) <input type="checkbox"/> 23c.			
PROMULGATING PHYSICIAN ONLY (See definitions on other side)		To the best of my knowledge, death occurred at the time, date and place stated. certify cause of death. <input type="checkbox"/> 23a.		LICENSE NUMBER					
ITEMS 24-26 must be completed by person who pronounces death.		TIME OF DEATH <input type="checkbox"/> 24. 12:30 A.M.		DATE PRONOUNCED DEAD (Month, Day, Year) <input type="checkbox"/> 25. Oct 7, 2005		WAS CASE REFERRED TO MEDICAL EXAMINER/CORONER? <input type="checkbox"/> 26. Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
27. PART I: Enter the diseases, injuries or complications which caused the death. Do not enter the mode of dying, such as cardiac or respiratory arrest, shock or heart failure. List only one cause on each line.						PART II: Other significant conditions contributing to death, but not resulting in the underlying cause given in PART I.			
IMMEDIATE CAUSE (Final disease or condition resulting in death) <input type="checkbox"/> 28a.		<i>acute myocardial infarction</i>		DUE TO (OR AS A CONSEQUENCE OF): <input type="checkbox"/> 28b. C.A.D.					
Sequentially list conditions if any, leading to immediate cause. Enter UNDERLYING CAUSE (Disease or injury that initiated events resulting in death) LAST <input type="checkbox"/> 28c.				DUE TO (OR AS A CONSEQUENCE OF): <input type="checkbox"/> 28d.					
CAUSE OF DEATH (See definitions on other side)		WERE AUTOPSY FINDINGS AVAILABLE PRIOR TO COMPLETION OF CAUSE OF DEATH? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 28e.		MANNER OF DEATH <input checked="" type="checkbox"/> Natural <input type="checkbox"/> Homicide <input type="checkbox"/> Pending Investigation <input type="checkbox"/> 29a. 30a.		DATE OF INJURY (Month, Day, Year) <input type="checkbox"/> 30b. 30c.	TIME OF INJURY <input type="checkbox"/> 30b. M. 30c.	INJURY AT WORK? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 30d.	DESCRIBE HOW INJURY OCCURRED.
CERTIFIER (See definitions on other side)		Was AN AUTOPSY PERFORMED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 28b.		Suicide <input type="checkbox"/> Could not be determined <input type="checkbox"/> 29b.		PLACE OF INJURY - At home, farm, street, factory, office building, etc. (Specify) <input type="checkbox"/> 30b.	LOCATION (Street, City/Town, State) <input type="checkbox"/> 30d.		
CERTIFIER (Check only one)		*CERTIFYING PHYSICIAN (Physician certifying cause of death when another physician has pronounced death and completed Item 23)				SIGNATURE AND TITLE OF CERTIFIER <input type="checkbox"/> 31b. <i>Charles Hardester, Coroner</i>			
		To the best of my knowledge, death occurred due to the cause(s) and manner as stated.				LICENSING NUMBER <input type="checkbox"/> 31c. <i>NA</i>			
*PRONOUNCING AND CERTIFYING PHYSICIAN (Physician both pronouncing death and certifying to cause of death)		To the best of my knowledge, death occurred at the time, date, and place, and due to the cause(s) and manner as stated.				NAME AND ADDRESS OF PERSON WHO COMPLETED CAUSE OF DEATH (Item 27) Type of Print <input type="checkbox"/> 31d. <i>R. Joel Heath, 906 Edward St. Philipsburg, PA 16866</i>			
*MEDICAL EXAMINER/CORONER On the basis of examination and/or investigation, in my opinion, death occurred at the time, date, and place, and due to the cause(s) and manner as stated.						DATE FILED (Month, Day, Year) <input type="checkbox"/> 32. <i>JAN 23 2006</i>			
28a.						34.			
NAME OF DECEDENT <i>Vincent A. DeChurch</i>		STATE OFFICE-37-000				EXHIBIT A			

MARK J. UDREN & ASSOCIATES
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
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

Washington Mutual Bank, FA
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.
Vince A. DeChurch, Jr. a/k/a Vincent
A. DeChurch, Jr., Last Record Owner
Deborah L. DeChurch
Defendants

NO. 2006-666-CD

AFFIDAVIT OF GOOD FAITH INVESTIGATION

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff in this action, that he is authorized to take this Affidavit, and hereby sets forth that the undersigned conducted a good faith investigation of the existence of and whereabouts of any surviving heirs of the deceased Defendant mortgagors and real owners by inquiring with the Clearfield County Register of Wills whether an Estate was raised by the granting of the Letters Testamentary and/or Letters of Administration.

The Register advised the undersigned that no decedent's Estate was raised of record, and Letters were not granted.

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

Dated:

UDREN LAW OFFICES, P.C.

Mark J. Udren, Esquire
Attorney for Plaintiff

EXHIBIT B

VERIFICATION

Mark J. Udren, Esquire, hereby states that he is the Attorney for the Plaintiff in this action, that he is authorized to take this Verification, and that the statements made in the foregoing MOTION FOR SERVICE PURSUANT TO SPECIAL ORDER OF COURT are true and correct to the best of his knowledge, information and belief.

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

UDREN LAW OFFICES, P.C.

Date: June 26, 2006



Mark J. Udren, Esquire
Attorney for Plaintiff

MARK J. UDREN & ASSOCIATES
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
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

Washington Mutual Bank, FA
Plaintiff
v.
Vince A. DeChurch, Jr. a/k/a Vincent
A. DeChurch, Jr., Last Record Owner
Deborah L. DeChurch
Defendants

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
NO. 2006-666-CD

CERTIFICATE OF SERVICE

I, Mark J. Udren, Esquire, hereby certify that I have served true and correct copies of the Motion For Service Pursuant to Special Order of Court upon the following person named herein at their last known address or their attorney of record by:

X Regular First Class Mail

Certified Mail
Other

Date Served: June 21, 2006

TO: Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner
517 Locust Street
Dubois, PA 15801

Unknown Heirs of Vince A. DeChurch a/k/a Vincent A. DeChurch,
Last Record Owner
517 Locust Street
Dubois, PA 15801

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire
Attorney for Plaintiff

FILED
JUN 28 2006

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 4 Services

Sheriff Docket # **101501**

WASHINGTON MUTUAL BANK, FA

Case # **06-666-CD**

vs.

VINCE A. DECHURCH, JR. aka VINCENT A. DECHURCH JR. Last Record
Owner

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW May 19, 2006 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN
MORTGAGE FORECLOSURE "NOT FOUND" AS TO VINCE A. DECHURCH JR. AKA VINCENT A. DECHURCH JR.,
DEFENDANT. DEFENDANT "DECEASED".

SERVED BY: /

FILED

03-23-01
JUL 24 2006

LM
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101501
NO: 06-666-CD
SERVICE # 2 OF 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: WASHINGTON MUTUAL BANK, FA

VS.

DEFENDANT: VINCE A. DECHURCH, JR. aka VINCENT A. DECHURCH JR. Last Record Owner
DEBORAH L. DECHURCH

SHERIFF RETURN

NOW, May 04, 2006 AT 9:59 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON DEBORAH L. DECHURCH DEFENDANT AT 517 LOCUST ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DEBORAH L. DECHURCH, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / HUNTER

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 3 of 4 Services

Sheriff Docket # 101501

WASHINGTON MUTUAL BANK, FA

Case # 06-666-CD

vs.

VINCE A. DECHURCH, JR. aka VINCENT A. DECHURCH JR. Last Record
Owner

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW May 19, 2006 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO VINCE A. DECHURCH JR. AKA VINCENT A. DECHURCH JR., DEFENDANT. DEFENDANT "DECEASED".

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101501
NO: 06-666-CD
SERVICE # 4 OF 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: WASHINGTON MUTUAL BANK, FA

VS.

DEFENDANT: VINCE A. DECHURCH, JR. aka VINCENT A. DECHURCH JR. Last Record Owner
DEBORAH L. DECHURCH

SHERIFF RETURN

NOW, May 04, 2006 AT 9:59 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON DEBORAH L. DECHURCH DEFENDANT AT 517 LOCUST ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DEBORAH L. DECHURCH, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / NEVLING

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101501
NO: 06-666-CD
SERVICES 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: WASHINGTON MUTUAL BANK, FA

vs.

DEFENDANT: VINCE A. DECHURCH, JR. aka VINCENT A. DECHURCH JR. Last Record Owner
DEBORAH L. DECHURCH

SHERIFF RETURN

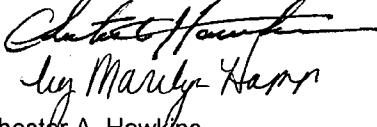
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	59235	40.00
SHERIFF HAWKINS	UDREN	59235	60.00
SHERIFF HAWKINS	1	65806	7.82

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
pleadings@udren.com

Washington Mutual Bank, FA
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120
Plaintiff

v.

Vince A. DeChurch, Jr. a/k/a
Vincent A. DeChurch, Jr., Last
Record Owner
Deborah L. DeChurch
517 Locust Street
Dubois, PA 15801
Defendant(s)

ATTORNEY FOR PLAINTIFF

WE HEREBY CERTIFY THE
COPY TO BE A TRUE AND
CORRECT COPY OF THE ORIGINAL

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

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

NO. 2006-666-CO MAY 01 2006

Attest.

William L. Brown
Prothonotary/
Clerk of Courts

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 x 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 asentar 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 dafiene, 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 SUFICIENTE 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 x 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: PNC Mortgage Corp. of America
Assignments of Record to: Washington Mutual Bank, FA
Recording Date: LODGED FOR RECORDING

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: 339 Treasure Lake
MUNICIPALITY/TOWNSHIP/BOROUGH: Sandy Township
COUNTY: Clearfield
DATE EXECUTED: 4/29/99
DATE RECORDED: 4/29/99 INSTRUMENT #: 199906734
MORTGAGE MODIFICATION RECORDED: 6/29/05
INSTRUMENT #: 200509743

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

4/1/06:

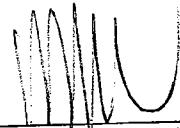
Principal of debt due	\$92,922.74
Unpaid Interest at 6.75% from 10/1/05 to 4/1/06 (the per diem interest accruing on this debt is \$17.18 and that sum should be added each day after 4/1/06)	3,136.14
	325.00
Title Report	
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Escrow Overdraft/(Balance) (The monthly escrow on this account is \$242.78 and that sum should be added on the first of each month after 4/1/06)	(480.12)
Late Charges (monthly late charge of \$36.00 should be added in accordance with the terms of the note each month after 4/1/06)	180.00
MIP	65.80
Recoverable Balance	782.50
Attorneys Fees (anticipated and actual to 5% of principal)	<u>4,646.14</u>
TOTAL	\$101,858.20

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. Notice of Intention to Foreclose under Act 6 of 1974 of the Commonwealth of Pennsylvania has been sent to each Defendant,

certified mail, in accordance with the requirements of that act, and copy(s) are attached hereto as Exhibit "A" and made part hereof. The notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983, has not been sent because the Mortgage is insured by the Federal Housing Administration ("FHA") and the notice is therefore not required.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$101,858.20 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 certain tracts of land designated as Lots Nos. 146 and 147, Section 15, "Bimini" in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Office in Misc. Docket Map File No. 25.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declaration of Restrictions, Treasure Lake, Inc., recorded in Misc. Book Vol. 146, page 476; all of said restrictions being covenants which run with the land.
3. All mineral and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Developer, or Treasure Lake Property Owners Association, Inc., which lien shall run with the land and be an encumbrance against it.

BEING the same premises which became vested in the Mortgagors herein by deed of James R. Hendricks and Annette M. Hendricks, dated October 30, 1998 and not yet recorded but intended to be prior to the recording of this mortgage.

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

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

PENNSYLVANIA OFFICE
215-568-9500
215-568-1141 FAX

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PLEASE RESPOND TO NEW JERSEY OFFICE

March 24, 2006

CERTIFIED MAIL

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RETURN RECEIPT	RECEIVED					
ARTICLE #	7005	3110	0002	1954	2255	
	7005	3110	0002	1954	2293	
	7005	3110	0002	1954	2286	
	7005	3110	0002	1954	2279	

Vince A DeChurch
Deborah L DeChurch
339 Treasure Lake
DeBois PA 15801

Re: Servicer/Mortgagee Washington Mutual
Mortgagor Jacqueline Binder
Loan No. 6161456550
Premises: 339 Treasure Lake
DeBois PA 15801

NOTICE OF DEFAULT AND INTENTION TO TAKE ACTION

Dear Borrower(s) :

Washington Mutual, is the holder or servicer of your Promissory Note and Mortgage on the above premises (339 Treasure Lake DeBois PA 15801) securing the Note. You are in default of certain obligations under these documents as follows:

You have failed to make payments in the amount of \$899.95 for November 1, 2005 and you have failed to make payments thereafter.

Failure to cure the default as specified may result in acceleration of the sums secured by your Mortgage, foreclosure by judicial proceedings and sale of the Premises.

EXHIBIT A

You can avoid the above actions by making payment to us of \$5528.05, which includes all accrued late charges, costs, and attorney's fees incurred to date. Payment must be made either by cash, cashier's check, certified check or money order. If we do not receive your payment in full by April 1, 2006, you must also add an additional \$899.95 for the monthly payment due. If we do not receive your payment by April 15, 2006, you must add an additional late charge of \$36.00.

If your mortgage so provides, you have the right to reinstate after acceleration and the right to assert in the foreclosure proceedings the non-existence of a default or any other defense to acceleration and foreclosure.

Only if your Mortgage so provides, notwithstanding acceleration of the sums secured by the Mortgage, you shall have the right to have any proceedings begun by us to enforce the Mortgage discontinued anytime prior to at least one hour prior to the commencement of bidding at a Sheriff's sale or other sale pursuant to the Mortgage, if you comply with its requirements allowing such reinstatement.

You may cure your default by making payment of the amounts indicated above to us at the address on the letterhead.

I urge you to contact the undersigned promptly upon receipt of this letter.

Very truly yours,



MARK J. UDREN, ESQUIRE

MJU/tmr
cc: First Class Mail

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) 669-6900

SEARCHED
SERIALIZED
INDEXED
FILED

Udren Law Offices, PC
Woodcrest Corporate Center
111 Woodcrest Road
Suite 200
Cherry Hill, NJ 08003



Unknown Heirs of:
Vince A. DeChurch (deceased)
339 Treasure Lake
DeBois, PA 15801

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

Postage	\$ 39
Certified Fee	240
Return Receipt Fee (Endorsement Required)	185
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 464

Postmark
Here

Sent To: unknown Heirs of
Vince A. DeChurch (deceased)
Street, Apt. No.: 339 Treasure Lake
or PO Box No.
City, State, ZIP: DeBois, PA 15801

PS Form 3800, June 2002
See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is required.
- 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

1. Article Addressed to:
Unknown heirs of
Vince A. Church (deceased)
339 Treasure Lake
Debts, PA 15801

COMPLETE THIS SECTION ON DELIVERY

Certified Mail Provides:

M 3800, June 2002 (Reverse)

PS Form 3811, February 2004

2. Article Number
(Transfer from service label)

2. Article Number
(Transfer from service label)

Domestic Return Receipt

~~~~~ address  
Udren Law Offices, PC  
Woodcrest Corporate Center  
111 Woodcrest Road  
Suite 200  
Cherry Hill, NJ 08003



**CERTIFIED MAIL**

POSTAGE & FEES ARE NOT APPLICABLE TO THIS MAIL

Unknown Heirs of:  
Vince A. DeChurch (deceased)  
517 Locust Street  
DeBois, PA 15801

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

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

**OFFICIAL USE**

|                                                   |        |
|---------------------------------------------------|--------|
| Postage                                           | \$ 39  |
| Certified Fee                                     | 240    |
| Return Receipt Fee<br>(Endorsement Required)      | 185    |
| Restricted Delivery Fee<br>(Endorsement Required) |        |
| Total Postage & Fees                              | \$ 464 |

Postmark  
Here

Sent To: unknown Heirs of:  
Vince A. DeChurch (deceased)  
Street, Apt. No.: 517 Locust Street  
or PO Box No.:  
City, State, ZIP: DeBois PA 15801

PS Form 3800, June 2002  
See Reverse for Instructions

addressed to APDs and FPOs.

**IMPORTANT:** Save this receipt and present it when mailing an inquiry.

if the post office for posmarking, attach and affix label with postage and mail.

if a postmark on the Certified Mail receipt is desired, please present the mail

addressee's authorized agent. Advise the clerk or mark the mailpiece with the

addressee's additional fee, delivery may be restricted to the addressee if

a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is

required. To obtain Return Receipt Requested, please complete and attach a Return

Receipt (PS Form 3811) to the article and add postage to cover the

delivery. To obtain Return Receipt, please complete and attach a Return

Receipt (PS Form 3811) to the article and add postage to cover the

delivery. For an additional fee, a Return Receipt may be requested to provide proof of

receipt. To obtain Return Receipt Requested, please complete and attach a Return

Receipt (PS Form 3811) to the article and add postage to cover the

delivery. Certified Mail is not available for First-Class Mail® or Priority Mail

or International Mail. Certified Mail may be combined with First-Class Mail® or Priority Mail

or International Mail. Certified Mail is not available for Registered Mail.

For an additional fee, a Return Receipt may be requested to provide proof of

receipt. To obtain Return Receipt Requested, please complete and attach a Return

Receipt (PS Form 3811) to the article and add postage to cover the

delivery. Certified Mail is not available for Registered Mail.

**Certified Mail Provides:**

S Form 3800, June 2002 (Reverse)

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

Agent

Addressee

**X** B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?  Yes

No

If YES, enter delivery address below:

WILLIAM H. HARRIS  
Vince A. Deitch (Signature)

317 W. 100th Street  
DeBOS, PA 15801

**3. Service Type**

Certified Mail

Express Mail

Return Receipt for Merchandise

Registered

C.O.D.

Insured Mail

Extra Fee

4. Restricted Delivery? (Extra Fee)  Yes

2. Article Number

7005 3110 0002 1954 2255

Transfer from service label

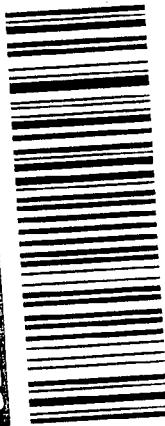
Domestic Return Receipt

PS Form 3811, February 1997

102595-02 M-1540

Urgent Referrals

Udren Law Offices, PC  
Woodcrest Corporate Center  
111 Woodcrest Road  
Suite 200  
Cherry Hill, NJ 08003



EL622 45612 2000 DTE 5002  
EL622 45612 2000 DTE 5002

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

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

**OFFICIAL USE**

|                                                   |        |
|---------------------------------------------------|--------|
| Postage                                           | \$ 29  |
| Certified Fee                                     | 240    |
| Return Receipt Fee<br>(Endorsement Required)      | 185    |
| Restricted Delivery Fee<br>(Endorsement Required) |        |
| Total Postage & Fees                              | \$ 400 |

Postmark  
Here

**Sent To:** *Vince A DeChurch (deceased)*  
Street, Apt. No.: *517 Locust Street*  
or PO Box No. *Deposits PA 15801*

City, State, ZIP+4

PS Form 3800, June 2002

See Reverse for Instructions

Vince A. DeChurch (deceased)  
517 Locust Street  
DeBois, PA 15801

**Certified Mail Provides:**

Form 3800, June 2002 (Reverse)

Domestic Return Receipt

- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years
- Import Reminders: Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail.
- For an additional fee, a Return Receipt service may be requested to provide proof of delivery. To obtain Return Receipt service, please combine with Certified Mail fee. Endorsement (PS Form 381) to the article and add applicable postage to cover the additional fee. Delivery may be restricted to the addressee with a duplicate return address.
- For an additional fee, delivery may be restricted to the addressee with a duplicate return address.
- Addressee's authorized agent may be clerk or mark the mailpiece with endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the addressee's address to the post office for postmarking. If a postmark is not needed, attach and affix label with postage and mail.
- REPORTANT: Save this receipt and present it when making an inquiry addressed to APDs and FPGs.

**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:  
Vince A. DeMarco (DeMarco)  
517 West Street  
Dover, PA 15801

**COMPLETE THIS SECTION ON DELIVERY**

|                                                                                        |                                                                                 |
|----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| A. Signature                                                                           | <input checked="" type="checkbox"/> Agent<br><input type="checkbox"/> Addressee |
| B. Received by (Printed Name)                                                          | C. Date of Delivery                                                             |
| D. Is delivery address different from item 1?<br>If YES, enter delivery address below: |                                                                                 |
| <input type="checkbox"/> Yes<br><input type="checkbox"/> No                            |                                                                                 |
| 4. Restricted Delivery? (Extra Fee)                                                    |                                                                                 |

1. Article Number \_\_\_\_\_  
2. Article Number (Label) \_\_\_\_\_  
Transfer from service label

PS Form 3811, February 2004

7005 3110 0002 1954 2293

102595-02-M-1540

Domestic Return Receipt

1100252, refer, als

Udren Law Offices, PC  
Woodcrest Corporate Center  
111 Woodcrest Road  
Suite 200  
Cherry Hill, NJ 08003



9822 4561 2000 0776 5002  
9822 4561 2000 0776 5002

|                                                                                                |  |
|------------------------------------------------------------------------------------------------|--|
| U.S. Postal Service™                                                                           |  |
| CERTIFIED MAIL™ RECEIPT                                                                        |  |
| (Domestic Mail Only; No Insurance Coverage Provided)                                           |  |
| For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a> ® |  |
| OFFICIAL USE                                                                                   |  |

|                                                   |        |
|---------------------------------------------------|--------|
| Postage                                           | \$ 391 |
| Certified Fee                                     | 240    |
| Return Receipt Fee<br>(Endorsement Required)      | 185    |
| Restricted Delivery Fee<br>(Endorsement Required) |        |
| Total Postage & Fees                              | \$ 464 |

Postmark  
Here

|                                    |                     |
|------------------------------------|---------------------|
| Sent To                            | Deborah L. DeChurch |
| Street, Apt. No.,<br>or PO Box No. | 517 Locust Street   |
| City, State, ZIP                   | DeBois, PA 15801    |

See Reverse for Instructions

USPS Form 3800, June 2002

Deborah L. DeChurch  
517 Locust Street  
DeBois, PA 15801

**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.

COMPLETE THIS SECTION ON DELIVERY

Form 3800, June 2002 (Reverse)

### **Certified Mail Providers:**

12. Article Number  
(Transfer from service label)

3005 3110 0002 1954 2286  
Intercept

1. Article Addressed to:  
Deacon L. DeChurch  
517 Locust Street  
Dubois, PA 15801

102595-02-M-1540

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.

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

Washington Mutual Bank, FA  
1270 Northland Drive  
Suite 200  
Mendota Heights, MN 55120  
Plaintiff  
v.  
Vince A. DeChurch, Jr. a/k/a  
Vincent A. DeChurch, Jr., Last  
Record Owner  
Deborah L. DeChurch  
517 Locust Street  
Dubois, PA 15801  
Defendant(s)

ATTORNEY FOR PLAINTIFF

*W. E. L. M.*  
I HEREBY CERTIFY THE  
WITNESS TO BE A TRUE AND  
CORRECT COPY OF THE ORIGINAL

COURT OF COMMON PLEAS  
CIVIL DIVISION

Clearfield County

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

NO. 2006-666-CO

MAY 01 2006

Attest.

*W. E. L. M.*  
Prothonotary/  
Clerk of Courts

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 x 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 asentar 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 defiende, 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. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641 x 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: PNC Mortgage Corp. of America  
Assignments of Record to: Washington Mutual Bank, FA  
Recording Date: LODGED FOR RECORDING

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: 339 Treasure Lake  
MUNICIPALITY/TOWNSHIP/BOROUGH: Sandy Township  
COUNTY: Clearfield  
DATE EXECUTED: 4/29/99  
DATE RECORDED: 4/29/99 INSTRUMENT #: 199906734  
MORTGAGE MODIFICATION RECORDED: 6/29/05  
INSTRUMENT #: 200509743

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

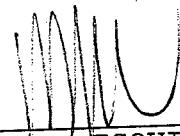
|                                                                                                                                                                               |                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| 4/1/06:                                                                                                                                                                       |                 |
| Principal of debt due                                                                                                                                                         | \$92,922.74     |
| Unpaid Interest at 6.75%<br>from 10/1/05<br>to 4/1/06<br>(the per diem interest accruing on<br>this debt is \$17.18 and that sum<br>should be added each day after<br>4/1/06) | 3,136.14        |
|                                                                                                                                                                               | 325.00          |
| Title Report                                                                                                                                                                  |                 |
| Court Costs (anticipated, excluding<br>Sheriff's Sale costs)                                                                                                                  | 280.00          |
| Escrow Overdraft/(Balance)<br>(The monthly escrow on this account<br>is \$242.78 and that sum should<br>be added on the first of each<br>month after 4/1/06)                  | (480.12)        |
| Late Charges<br>(monthly late charge of \$36.00<br>should be added in accordance<br>with the terms of the note<br>each month after 4/1/06)                                    | 180.00          |
|                                                                                                                                                                               | 65.80           |
| MIP                                                                                                                                                                           |                 |
| Recoverable Balance                                                                                                                                                           | 782.50          |
| Attorneys Fees (anticipated and actual<br>to 5% of principal)                                                                                                                 | <u>4,646.14</u> |
| TOTAL                                                                                                                                                                         | \$101,858.20    |

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. Notice of Intention to Foreclose under Act 6 of 1974 of the Commonwealth of Pennsylvania has been sent to each Defendant,

certified mail, in accordance with the requirements of that act, and copy(s) are attached hereto as Exhibit "A" and made part hereof. The notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983, has not been sent because the Mortgage is insured by the Federal Housing Administration ("FHA") and the notice is therefore not required.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$101,858.20 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. Udran, ESQUIRE  
UDREN LAW OFFICES, P.C.  
Attorney for Plaintiff  
Attorney I.D. No. 04302

ALL that certain tracts of land designated as Lots Nos. 146 and 147, Section 15, "Bimini" in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Office in Misc. Docket Map File No. 25.

**EXCEPTING AND RESERVING therefrom and subject to:**

1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.

2. The Declaration of Restrictions, Treasure Lake, Inc., recorded in Misc. Book Vol. 146, page 476; all of said restrictions being covenants which run with the land.

3. All mineral and mining rights of every kind and nature.

4. A lien for all unpaid charges or assessments as may be made by Developer, or Treasure Lake Property Owners Association, Inc., which lien shall run with the land and be an encumbrance against it.

**BEING** the same premises which became vested in the Mortgagors herein by deed of James R. Hendricks and Annette M. Hendricks, dated October 30, 1998 and not yet recorded but intended to be prior to the recording of this mortgage.

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  
215-568-1141 FAX

MARK J. UDREN\*  
STUART WINNEG\*\*  
GAYL SPIVAK ORLOFF\*\*\*  
HEIDI R. SPIVAK\*\*\*  
MARISA JOY MYERS\*\*\*  
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

March 24, 2006

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

ARTICLE #7005 3110 0002 1954 2255  
7005 3110 0002 1954 2293  
7005 3110 0002 1954 2286  
7005 3110 0002 1954 2279

Vince A DeChurch  
Deborah L DeChurch  
339 Treasure Lake  
DeBois PA 15801

Re: Servicer/Mortgagee Washington Mutual  
Mortgagor Jacqueline Binder  
Loan No. 6161456550  
Premises: 339 Treasure Lake  
DeBois PA 15801

NOTICE OF DEFAULT AND INTENTION TO TAKE ACTION

Dear Borrower(s):

Washington Mutual, is the holder or servicer of your Promissory Note and Mortgage on the above premises (339 Treasure Lake DeBois PA 15801) securing the Note. You are in default of certain obligations under these documents as follows:

You have failed to make payments in the amount of \$899.95 for November 1, 2005 and you have failed to make payments thereafter.

Failure to cure the default as specified may result in acceleration of the sums secured by your Mortgage, foreclosure by judicial proceedings and sale of the Premises.

EXHIBIT A

You can avoid the above actions by making payment to us of \$5528.05, which includes all accrued late charges, costs, and attorney's fees incurred to date. Payment must be made either by cash, cashier's check, certified check or money order. If we do not receive your payment in full by April 1, 2006, you must also add an additional \$899.95 for the monthly payment due. If we do not receive your payment by April 15, 2006, you must add an additional late charge of \$36.00.

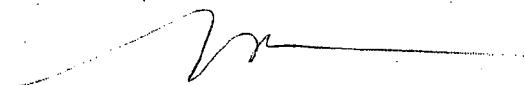
If your mortgage so provides, you have the right to reinstate after acceleration and the right to assert in the foreclosure proceedings the non-existence of a default or any other defense to acceleration and foreclosure.

Only if your Mortgage so provides, notwithstanding acceleration of the sums secured by the Mortgage, you shall have the right to have any proceedings begun by us to enforce the Mortgage discontinued anytime prior to at least one hour prior to the commencement of bidding at a Sheriff's sale or other sale pursuant to the Mortgage, if you comply with its requirements allowing such reinstatement.

You may cure your default by making payment of the amounts indicated above to us at the address on the letterhead.

I urge you to contact the undersigned promptly upon receipt of this letter.

Very truly yours,

  
MARK J. UDREN, ESQUIRE

MJU/tmr  
cc: First Class Mail

## 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.

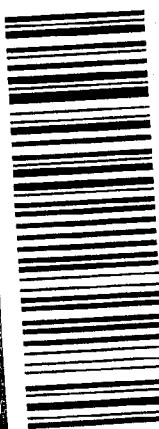
If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of 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) 669-6900

INFORMATION Requests

Udren Law Offices, PC  
Woodcrest Corporate Center  
111 Woodcrest Road  
Suite 200  
Cherry Hill, NJ 08003



6222 4567 2000 076 5002  
6222 4567 2000 076 5002

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

**OFFICIAL USE**

|                                                   |        |
|---------------------------------------------------|--------|
| Postage                                           | \$ 39  |
| Certified Fee                                     | 240    |
| Return Receipt Fee<br>(Endorsement Required)      | 185    |
| Restricted Delivery Fee<br>(Endorsement Required) |        |
| Total Postage & Fees                              | \$ 464 |

Postmark  
Here

Sent To unknown Heirs of  
Vince A. DeChurch (deceased)  
Street, Apt. No.: 339 Treasure Lake  
or PO Box No.  
City, State, ZIP: DeBois, PA 15801

PS Form 3800, June 2002

See Reverse for Instructions

Unknown Heirs of:  
Vince A. DeChurch (deceased)  
339 Treasure Lake  
DeBois, PA 15801



Udren Law Offices, PC  
Woodcrest Corporate Center  
111 Woodcrest Road  
Suite 200  
Cherry Hill, NJ 08003

U.S. Postal Service™  
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**OFFICIAL USE**

|                                                   |        |
|---------------------------------------------------|--------|
| Postage                                           | \$ 39  |
| Certified Fee                                     | 240    |
| Return Receipt Fee<br>(Endorsement Required)      | 185    |
| Restricted Delivery Fee<br>(Endorsement Required) |        |
| Total Postage & Fees                              | \$ 464 |

Postmark  
Here

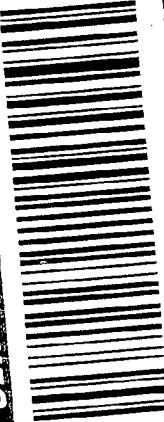
Sent To: unknown heirs of:  
Vince A. DeChurch (deceased)  
Street, Apt. No.: 517 LOCUST STREET  
or PO Box No.:  
City, State, Zip: DeBois PA 15801

See Reverse for Instructions

PS Form 3800, June 2002

**CERTIFIED MAIL**  
Please Retain Address Label  
For Return Address  
Postage Paid  
Postage Paid

5522 4567 2000 0711 5002  
5522 4567 2000 0711 5002

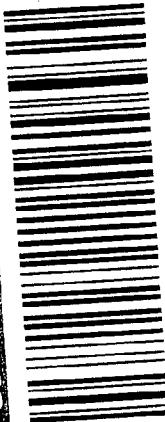


Unknown Heirs of:  
Vince A. DeChurch (deceased)  
517 Locust Street  
DeBois, PA 15801



Udren Law Offices

Udren Law Offices, PC  
Woodcrest Corporate Center  
111 Woodcrest Road  
Suite 200  
Cherry Hill, NJ 08003



6622 4547 2000 076 5002  
6622 4547 2000 076 5002

**U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT**  
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For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

|                                                   |        |
|---------------------------------------------------|--------|
| Postage                                           | \$ 39  |
| Certified Fee                                     | 240    |
| Return Receipt Fee<br>(Endorsement Required)      | 185    |
| Restricted Delivery Fee<br>(Endorsement Required) |        |
| Total Postage & Fees                              | \$ 464 |

Postmark  
Here

**Sent To:**  
Vince A DeChurch (deceased)  
517 Locust Street  
DeBois, PA 15801

PS Form 3800, June 2002

See Reverse for Instructions

Vince A. DeChurch (deceased)  
517 Locust Street  
DeBois, PA 15801

| COMPLETE THIS SECTION ON DELIVERY                                                                                                                                                                                                                                                |  |  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| <b>SENDER: COMPLETE THIS SECTION</b>                                                                                                                                                                                                                                             |  |  |
| <p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the envelope, or on the front if space permits.</p> |  |  |
| <p>1. Article Addressed to:</p> <p>Mr. <b>John (deceased)</b><br/> <b>111 West Street</b></p>                                                                                                                                                                                    |  |  |
| <p><b>A. Signature</b></p> <p><b>X</b></p>                                                                                                                                                                                                                                       |  |  |
| <p><b>B. Received by (Printed Name)</b></p>                                                                                                                                                                                                                                      |  |  |
| <p><b>C. Date of Delivery</b></p>                                                                                                                                                                                                                                                |  |  |
| <p><b>D. Is delivery address different from item 1?</b></p>                                                                                                                                                                                                                      |  |  |
| <p>If YES, enter delivery address below:</p>                                                                                                                                                                                                                                     |  |  |
| <p><b>4. Restricted Delivery? (Extra Fee)</b></p>                                                                                                                                                                                                                                |  |  |
| <p><input type="checkbox"/> Agent<br/> <input type="checkbox"/> Addressee</p>                                                                                                                                                                                                    |  |  |
| <p><input type="checkbox"/> Return Receipt for Merchandise<br/> <input type="checkbox"/> Registered<br/> <input type="checkbox"/> C.O.D.<br/> <input type="checkbox"/> Insured Mail<br/> <input type="checkbox"/> Yes</p>                                                        |  |  |

Form 3800, June 2002 (Reverse)

#### **Certified Mail Provides:**

2. Article Number  
(Transfer from service label) 7005 3110 0002 1954 2243  
PS Form 3811, February 2004  
Domestic Return Receipt  
102595-02-M-1340

Udren Law Offices, PC  
Woodcrest Corporate Center  
111 Woodcrest Road  
Suite 200  
Cherry Hill, NJ 08003

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, TOLD AT THIS LINE

**CERTIFIED MAIL™**

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

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

**OFFICIAL USE**

|                                                   |         |
|---------------------------------------------------|---------|
| Postage                                           | \$ 3.91 |
| Certified Fee                                     | 2.40    |
| Return Receipt Fee<br>(Endorsement Required)      | 1.85    |
| Restricted Delivery Fee<br>(Endorsement Required) |         |
| Total Postage & Fees                              | \$ 4.64 |

Postmark  
Here

**Sent To** Deborah L. Church  
517 Locust Street  
City, State, ZIP  
DeB013, PA 15801

PS-Form 3800, June 2002

See Reverse for Instructions

**Certified Mail Provides:**

- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years
- Import Remittances
- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail
- NO INSURANCE PROVIDED with Certified Mail
- Certified Mail is not available for any class of international mail.
- For an additional fee, a Return Receipt Service may be requested to provide a Return Receipt (PS Form 3811) to the addressee to cover delivery. To obtain Return Receipt Service, please complete postage to cover a delivery fee, endorse the post office for a Return Receipt, and attach a fee with a postmark on the post office postmark. If a postmark is desired, please present the addressee with a postmark or the post office postmark. If a postmark is not needed, attach a USPS® postmark on your Certified Mail receipt.
- Addressee's additional fee, delivery may be restricted to the addressee with a postmark "Restricted Delivery".
- If a postmark is not needed, attach a USPS® postmark on your Certified Mail receipt. If a postmark is desired, attach a postmark with postage and a "postmark" label with "postage paid" or "paid" and "mail" in large letters.
- IMPORTANT: Save this receipt and present it when making an inquiry addressed to APDs and FPDs.

For an additional fee, delivery may be restricted to the addressee with a postmark "Restricted Delivery".

Form 3800, June 2002 (Reverse)

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

Agent

Addressee

**X** B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?  Yes

No

If YES, enter delivery address below:

DONALD L. DELCHUR  
517 LOWST STREET  
DUBOIS, PA 15801

3. Service Type

Certified Mail  Express Mail

Registered  Return Receipt for Merchandise

C.O.D.  Insured Mail

4. Restricted Delivery? (Extra Fee)

Yes

12. Article Number  
(Transfer from service label)

7005 3110 2000 1954 682284

10259-02-M-1540

PS Form 3811, February 2000

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.

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

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

FREDDIE MAC  
PENNSYLVANIA  
DESIGNATED COUNSEL

April 27, 2006

Prothonotary of Clearfield County  
Clearfield County Courthouse  
Courthouse  
230 East Market Street  
Clearfield, PA 16830

Re: Washington Mutual Bank, FA  
vs.  
Vince A. DeChurch, Jr. a/k/a Vincent A. DeChurch, Jr., Last  
Record Owner  
Deborah L. DeChurch  
Complaint in Mortgage Foreclosure

Gentlemen:

In connection with the above captioned matter, enclosed please  
find the following:

1. Original Complaint in Mortgage Foreclosure to be filed  
together with a copy of the first page to be time stamped and  
returned in the enclosed self-addressed stamped envelope.
2. Our check payable to the Prothonotary of Clearfield County  
in the amount of \$85.00 in payment of your filing fee.
3. Package to be forwarded to the Sheriff's Office for service  
on the Defendant (s). Would you kindly place the action number  
on the Sheriff's copies.

Your assistance in this matter is greatly appreciated.

Sincerely yours,

Mark J. Udren, Esquire  
UDREN LAW OFFICES, P.C.  
MJU/db  
Enclosures

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

Washington Mutual Bank, FA  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Vince A. DeChurch, Jr. a/k/a  
Vincent A. DeChurch, Jr., Last  
Record Owner  
Deborah L. DeChurch

NO. 2006-666-CD

Defendant(s)

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY:

Kindly reinstate the Complaint on the above-captioned matter.

DATE: July , 2006

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

FILED Atypd.7.00  
M 12:41 PM No CC  
AUG 15 2006 Compl. Reinstated  
William A. Shaw  
Prothonotary/Clerk of Courts  
to Sheriff  
(6K)

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](mailto:pleadings@udren.com)

Washington Mutual Bank, FA  
1270 Northland Drive  
Suite 200  
Mendota Heights, MN 55120  
Plaintiff

v.

Vince A. DeChurch, Jr. a/k/a  
Vincent A. DeChurch, Jr., Last  
Record Owner  
Deborah L. DeChurch  
517 Locust Street  
Dubois, PA 15801  
Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

**FILED**

~~MAY 01 2006~~

~~William A. Shaw  
Prothonotary/Clerk of Courts~~

NO. 2006-666-C9

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 x 5982

**COPY**  
06030352 DB

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101823  
NO: 06-666-CD  
SERVICE # 1 OF 1  
COMPLAINT IN MORTGAGE FORECLOSURE &

ORDER

PLAINTIFF: WASHINGTON MUTUAL BANK, FA

vs.

DEFENDANT: VINCE A. DECHURCH JR. a/k/a VINCENT A. DECHURCH JR., Last Record Owner

**SHERIFF RETURN**

---

NOW, August 29, 2006 AT 11:28 AM POSTED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE & ORDER AT SEC 15 LOT 146/147, CARIBBEAN ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA.

SERVED BY: NEVLING / COUDRIET

**FILED**

AUG 30 2006  
6/215 (W)

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101823  
NO: 06-666-CD  
SERVICES 1  
COMPLAINT IN MORTGAGE FORECLOSURE &

ORDER

PLAINTIFF: WASHINGTON MUTUAL BANK, FA

vs.

DEFENDANT: VINCE A. DECHURCH JR. a/k/a VINCENT A. DECHURCH JR., Last Record Owner

**SHERIFF RETURN**

---

RETURN COSTS

| Description     | Paid By | CHECK # | AMOUNT |
|-----------------|---------|---------|--------|
| SURCHARGE       | UDREN   | 65596   | 10.00  |
| SHERIFF HAWKINS | UDREN   | 65596   | 26.30  |

Sworn to Before Me This

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

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

Washington Mutual Bank, FA  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.  
Vince A. DeChurch, Jr. a/k/a  
Vincent A. DeChurch, Jr., Last  
Record Owner  
Deborah L. DeChurch

NO. 2006-666-CD

Defendant(s)

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY:

Kindly reinstate the Complaint on the above-captioned matter.

DATE: September 13, 2006

UDREN LAW OFFICES, P.C.

Mark J. Udren, Esquire  
ATTORNEY FOR PLAINTIFF

FILED Atty pd.  
m/b:50/01 7:00  
SEP 18 2006 1 Comp. Reinstated  
William A. Shaw  
Prothonotary/Clerk of Courts  
to Atty  
6K

**FILED**

**SEP 18 2006**

William A. Shaw  
Prothonotary/Clerk of Courts

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

Washington Mutual Bank, FA  
1270 Northland Drive  
Suite 200  
Mendota Heights, MN 55120  
Plaintiff

v.  
Vince A. DeChurch, Jr. a/k/a  
Vincent A. DeChurch, Jr., Last  
Record Owner  
Deborah L. DeChurch  
517 Locust Street  
Dubois, PA 15801  
Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2006-666-CD

PRAECIPE TO FILE PROOF OF PUBLICATION

TO THE PROTHONOTARY:

Kindly file the attached Proof of Publication with regard to  
the captioned matter.

UDREN LAW OFFICES, P.C.

BY   
\_\_\_\_\_  
Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

DATE: October 27, 2006

FILED NO  
10/4/06 cc  
OCT 30 2006  
WAS

William A. Shaw  
Prothonotary/Clerk of Courts

## PROOF OF PUBLICATION

**STATE OF PENNSYLVANIA**  
**COUNTY OF CLEARFIELD**

On this 6th day of October AD 2006, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement published in said October 6, 2006, Vol. 18 No. 40. as to the time, place, and charac  
1617 John F. Kennedy Boulevard  
Suite 1400, One Penn Center  
Philadelphia, PA 19103-1814  
(215) 563-7000

Sworn and subscribed to before

Notary Public  
My Commission Expires

NOTARIAL SEAL  
SHARON J. PUSEY, Notary Public  
Clearfield, Clearfield County, PA  
My Commission Expires APRIL 7, 2007

GORMONT  
CONDITIONS OF SALE: THE HIGH-  
BUYER.  
Terms: The purchaser will be required  
to pay the full amount of his bid by TWO  
O'CLOCK P.M. on the day of the sale, and if  
compiled at the next Court of Common Pleas  
Sheriff at the time of levying the same.  
Purchase all the right, title, interest and claim  
for Clermont County, conveying to the  
purchaser all the right, title, interest and claim  
ALTHOUGH NOT PART OF THE MINIMUM  
TAXES AND THE PURCHASE WILL BE  
RESPONSIBLE FOR SAME. If above  
conditions be not complied with on the part  
of the Purchaser, the property will again be  
offered for sale by the Sheriff at THREE  
O'CLOCK P.M. on the same day. The said  
purchaser will be held liable for the  
deficiencies and additional cost of said sale.  
TAKE NOTICE that a Schedule of  
DISTRIBUTION will be filed within ten days  
of DECEMBER 4, 2006, distribution will be  
made in accordance with the schedule  
unless exceptions are filed within ten days  
therefrom.

 boro, Esquire

LAWYERS REFERRAL SERVICE  
David S. Meholic, Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814.765.2641 x5982

MARK J. UDREN  
ATTORNEY FOR PLAINTIFF  
UDREN LAW OFFICES, P.C.  
Woodcrest Corporate Center  
111 Woodcrest Rd., Ste. 200  
Cherry Hill, NJ 08003-3620  
856 482 6900

1209ite Thompson and Lisa Jane Thompson

Wayne, PA 19087

**FILED**

**OCT 30 2006**

William A. Shaw  
Prothonotary/Clerk of Courts

PROOF OF PUBLICATION OF NOTICE APPEARING IN THE  
COURIER EXPRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT  
PUBLISHED BY McLEAN PUBLISHING COMPANY,  
DUBOIS PENNSYLVANIA

Under act 587, Approved May 16, 1929, P.L. 1784

STATE OF PENNSYLVANIA  
COUNTY OF CLEARFIELD

SS:

Linda Smith, Advertising Director or Dory Ferra, Classified Advertising Supervisor of the Courier-Express/Tri-County Sunday/Jeffersonian Democrat of the County and State aforesaid, being duly sworn, deposes and says that the Courier Express, a daily newspaper, the Tri-County Sunday, a weekly newspaper and Jeffersonian Democrat, a weekly newspaper published by McLean Publishing Company at 500 Jeffers Street, City of DuBois, County and State aforesaid, which was established in the year 1879, since which date said, the daily publication and the weekly publications, has been regularly issued in said County, and that a copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions of the paper on the following dates, viz: the

2nd day of October A.D., 2006

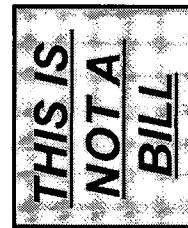
Affidavit further deposes that he is an officer duly authorized by the Courier-Express, a daily newspaper, Tri-County Sunday, a weekly newspaper, and/or Jeffersonian Democrat, a weekly newspaper to verify the foregoing statement under oath and also declared that affiant is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

McLEAN PUBLISHING COMPANY Publisher of  
COURIER-EXPRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT

By 

Sworn and subscribed to before me this 11th day of Oct., 2006





NOTARY PUBLIC  
Statement of Advertising Cost  
McLEAN PUBLISHING COMPANY  
Publisher of

COURIER-EXPRESS/TRI-COUNTY SUNDAY/  
JEFFERSONIAN DEMOCRAT  
Dubois, PA



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

Washington Mutual Bank, FA  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

NO. 2006-666-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: November 11, 2006

BY:

Mark J. Udren, Esquire  
Attorney for Plaintiff

FILED *16*  
*1104531cc*  
NOV 13 2006 *16*

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: May 31 2006

Holly Farley  
Name: Holly Farley  
Title: **Assistant Vice President**  
Company:  
Washington Mutual Bank

Vince A. DeChurch, Jr. a/k/a Vincent A. DeChurch, Jr., Last Record Owner  
Deborah L. DeChurch  
Loan #5100141208  
MJU #06030352

**FILED**

**NOV 13 2006**

William A. Shaw  
Prothonotary/Clerk of Courts

Attala County Vice President A

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION-LAW  
NO. 2006-666-CD  
NOTICE OF ACTION IN MORTGAGE FORECLOSURE

WASHINGTON MUTUAL BANK, FA, PLAINTIFF vs. VINCE A. DeCHURCH, JR. a/k/a VINCENT A. DeCHURCH, JR., LAST RECORD OWNER and DEBORAH L. DeCHURCH, DEFENDANTS

TO: VINCE A. DeCHURCH, JR. a/k/a VINCENT A. DeCHURCH, JR., LAST RECORD OWNER, Defendant, whose last known addresses are is 339 Treasure Lake, DuBois, PA 15801 and 517 Locust Street, DuBois, PA 15801.

COMPLAINT IN MORTGAGE FORECLOSURE

You are hereby notified that Plaintiff, WASHINGTON MUTUAL BANK, FA, has filed a Mortgage Foreclosure Complaint endorsed with a Notice to Defend, against you in the Court of Common Pleas of Clearfield County, Pennsylvania, docketed to NO. 2006-666-CD, wherein Plaintiff seeks to foreclose on the mortgage secured on your property located 339 Treasure Lake, DuBois, PA 15801, whereupon your property would be sold by the Sheriff of Clearfield County.

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the notice above, 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.

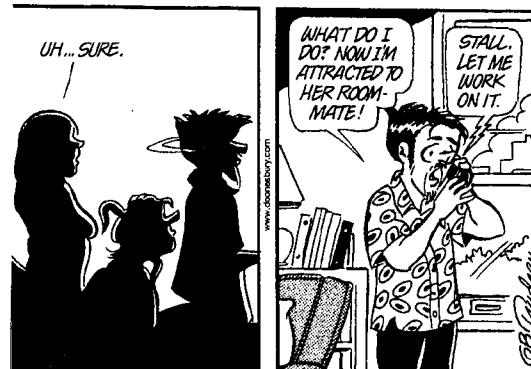
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH THE INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERRAL SERVICE

David S. Meholick, Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814.765.2641 x5982

MARK J. UDREN  
ATTORNEY FOR PLAINTIFF  
UDREN LAW OFFICES, P.C.  
Woodcrest Corporate Center  
111 Woodcrest Rd., Ste. 200  
Cherry Hill, NJ 08003-3620  
856.482.6900

10/2/06



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

Washington Mutual Bank, FA  
7800 N. 113th Street  
Milwaukee, WI 53224  
Plaintiff

v.

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner  
339 Treasure Lake  
Dubois, PA 15801

Deborah L. DeChurch  
517 Locust Street  
Dubois, PA 15801  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2006-666-CD

FILED Atty pd.  
m19/19/06 00:00  
NOV 14 2006 Notice to  
Def.

William A. Shaw  
Prothonotary/Clerk of Courts  
Statement  
to Atty  
(6K)

**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) Vince A. DeChurch, Jr. a/k/a Vincent A. DeChurch, Jr., Last Record Owner and Deborah L. DeChurch 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    | \$101,858.20            |
| Interest Per Complaint       | 3,848.32                |
| From 4/2/06 to 11/11/06      |                         |
| Late charges per Complaint   | 252.00                  |
| From 4/2/06 to 11/11/06      |                         |
| Escrow payment per Complaint | <u>1,699.46</u>         |
| From 4/2/06 to 11/11/06      |                         |
| <br>TOTAL                    | <br><u>\$107,657.98</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: 11/14/06

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

Washington Mutual Bank, FA  
Plaintiff

v.

Vince A. DeChurch, Jr. a/k/a Vincent A.  
DeChurch, Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2006-666-CD

TO: Deborah L. DeChurch  
517 Locust Street  
Dubois, PA 15801

DATE of Notice: October 31, 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. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641 x 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 x 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  
856-482-6900

ATTORNEY FOR PLAINTIFF

Washington Mutual Bank, FA  
1270 Northland Drive  
Suite 200  
Mendota Heights, MN 55120  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

v.  
Vince A. DeChurch, Jr. a/k/a  
Vincent A. DeChurch, Jr., Last  
Record Owner  
Deborah L. DeChurch  
517 Locust Street  
Dubois, PA 15801  
Defendant(s)

NO. 2006-666-CD

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF Minnesota :  
COUNTY OF Jackota : SS

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: Vince A. DeChurch, Jr. a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner

Age: Over 18

Residence: As captioned above

Employment: Unknown

Defendant: Deborah L. DeChurch

Age: Over 18

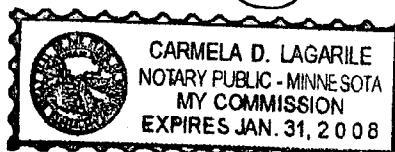
Residence: As captioned above

Employment: Unknown

Sworn to and subscribed  
before me this 31 day  
of May, 2006.

Carmela D. Lagarile  
Notary Public

Holly J. Farley  
Name: Holly Farley  
Title: **Assistant Vice President**  
Company: Washington Mutual Bank FA



MARK J. UDREN & ASSOCIATES  
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  
[pleadings@udren.com](mailto:pleadings@udren.com)

ATTORNEY FOR PLAINTIFF

RECEIVED  
JUN 29 2006  
CLERK'S OFFICE

Washington Mutual Bank, FA  
Plaintiff  
v.  
Vince A. DeChurch, Jr. a/k/a Vincent  
A. DeChurch, Jr., Last Record Owner  
Deborah L. DeChurch  
Defendants

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
NO. 2006-666-CD

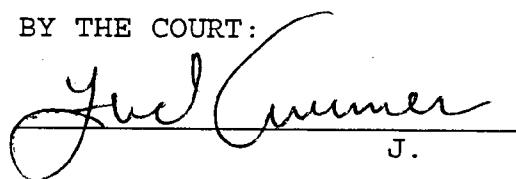
O R D E R

AND NOW, this 29<sup>th</sup> Day of June, 2006, upon consideration of Plaintiff's Motion For Service Pursuant To Special Order Of Court, and any response thereto, it is hereby ORDERED AND DECREED that Service of the Complaint In Mortgage Foreclosure on Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, and upon any and all Unknown Heirs of Vince A. DeChurch a/k/a Vincent A. DeChurch, Last Record Owner, shall be complete when Plaintiff or its counsel or agent has published in accordance with Pa.R.C.P. 430(b)(1) a Notice of the action once in the local legal publication and once in a newspaper of general circulation within the County; and, pursuant to Pa.R.C.P. 430, service of all subsequent pleadings that require personal service, including, inter alia, the Notice of Sheriff's Sale, shall be complete when the Sheriff, competent adult, constable, or other appropriate party has posted only, a copy of said subsequent pleadings and/or Notice on the most public part of the property located at: 339 Treasure Lake, Dubois, PA 15801, which is the subject matter of this action in mortgage foreclosure.

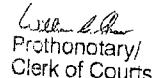
I hereby certify this to be a true and attested copy of the original statement filed in this case.

JUN 29 2006

BY THE COURT:

  
J.

Attest.

  
William L. Brown  
Prothonotary/  
Clerk of Courts

**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

October 27, 2006

Prothonotary of Clearfield County  
Clearfield County Courthouse  
Courthouse  
230 East Market Street  
Clearfield, PA 16830

Re: Washington Mutual Bank, FA  
vs.  
Vince A. DeChurch, Jr. a/k/a Vincent A. DeChurch, Jr., Last  
Record Owner  
Deborah L. DeChurch  
Clearfield County C.C.P. No. 2006-666-CD

Gentlemen:

In connection with the above file, enclosed please find Praeclipe  
to File Proof of Publication.

I have enclosed an extra copy of the Praeclipe to be time stamped  
and returned in the enclosed self-addressed stamped envelope.

Thank you for your assistance with this matter.

Sincerely yours,



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

/MJU  
Enclosure

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION-LAW  
NO. 2006-666-CD

NOTICE OF ACTION IN MORTGAGE FORECLOSURE

WASHINGTON MUTUAL BANK, FA, PLAINTIFF vs. VINCE A. De-  
CHURCH, JR. a/k/a VINCENT A. DeCHURCH, JR., LAST RE-  
CORD OWNER and DEBORAH L. DeCHURCH, DEFENDANTS

Y MCLEAN PUBLISHING COMPANY,  
UBOIS PENNSYLVANIA  
7, Approved May 16, 1929, P.L. 1784

SS:

TO: VINCE A. DeCHURCH, JR. a/k/a VINCENT A. DeCHURCH, JR., LAST RECORD OWNER, Defendant; whose last known address are is 339 Treasure Lake, DuBois, PA 15801 and 517 Locust Street, DuBois, PA 15801.

**COMPLAINT IN MORTGAGE FORECLOSURE**  
You are hereby notified that Plaintiff, WASHINGTON MUTUAL BANK, FA, has filed a Mortgage Foreclosure Complaint endorsed with a Notice to Defend, against you in the Court of Common Pleas of Clearfield County, Pennsylvania, docketed to NO. 2006-666-CD, wherein Plaintiff seeks to foreclose on the mortgage secured on your property located 339 Treasure Lake, DuBois, PA 15801, whereupon your property would be sold by the Sheriff of Clearfield County.

**NOTICE**

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the notice above, 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 THE 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. Meholick, Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814.765.2641 x5982

MARK J. UDREN  
ATTORNEY FOR PLAINTIFF  
UDREN LAW OFFICES, P.C.  
Woodcrest Corporate Center  
111 Woodcrest Rd., Ste. 200  
Cherry Hill, NJ 08003-3620  
856.482.6900

10/2/06

erra, Classified Advertising Supervisor of the Courier-Express/Tri-County Daily and State aforesaid, being duly sworn, deposes and says that the Courier

Sunday, a weekly newspaper and Jeffersonian Democrat, a weekly Company at 500 Jeffers Street, City of DuBois, County and State aforesaid, which date said, the daily publication and the weekly publications, has been by of the printed notice of publication is attached hereto exactly as the same

ons of the paper on the following dates, viz: the

October A.D., 2006

duly authorized by the Courier-Express, a daily newspaper, Tri-County Democrat, a weekly newspaper to verify the foregoing statement

interested in the subject matter of the aforesaid notice of publication, and

as to time, place and character of publication are true.

**PUBLISHING COMPANY Publisher of  
COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT**

*John L. Hall*

11th day of Oct. 1, 2006

*Robin M. Duttry*  
NOTARY PUBLIC

Statement of Advertising Cost  
PUBLISHING COMPANY  
Publisher of

**EXPRESS/TRI-COUNTY SUNDAY/  
JEFERSONIAN DEMOCRAT**

DuBois, PA

NOTARIAL SEAL  
ROBIN M. DUTTRY, NOTARY PUBLIC  
CITY OF DUBOIS, CLEARFIELD COUNTY  
MY COMMISSION EXPIRES APRIL 16, 2010

## PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

COUNTY OF CLEARFIELD :

On this 6th day of October AD 2006, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement published in said publication in the regular issues of Week of October 6, 2006, Vol. 18 No. 40. And that all of the allegations of this statement as to the time, place, and character of the publication are true.



Gary A. Knaresboro, Esquire  
Editor

Sworn and subscribed to before me the day and year aforesaid.

IN THE COURT OF COMMON PLEAS

LAWYERS REFERRAL SERVICE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101823  
NO: 06-666-CD  
SERVICE # 1 OF 1  
COMPLAINT IN MORTGAGE FORECLOSURE &

ORDER

PLAINTIFF: WASHINGTON MUTUAL BANK, FA  
vs.

DEFENDANT: VINCE A. DECHURCH JR. a/k/a VINCENT A. DECHURCH JR., Last Record Owner

**COPY**

**SHERIFF RETURN**

---

NOW, August 29, 2006 AT 11:28 AM POSTED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE &  
ORDER AT SEC 15 LOT 146/147, CARIBBEAN ROAD, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA.

SERVED BY: NEVLING / COUDRIET

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101501  
NO: 06-666-CD  
SERVICE # 2 OF 4  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: WASHINGTON MUTUAL BANK, FA  
VS.

DEFENDANT: VINCE A. DECHURCH, JR. aka VINCENT A. DECHURCH JR. Last Record Owner  
DEBORAH L. DECHURCH

**SHERIFF RETURN**

---

NOW, May 04, 2006 AT 9:59 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON DEBORAH L. DECHURCH DEFENDANT AT 517 LOCUST ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO DEBORAH L. DECHURCH, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / HUNTER

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

Washington Mutual Bank, FA  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Vince A. DeChurch, Jr. a/k/a Vincent A.  
DeChurch, Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

NO. 2006-666-CD

TO: Vince A. DeChurch, Jr. a/k/a Vincent A. DeChurch, Jr.,  
Last Record Owner  
339 Treasure Lake  
Dubois, PA 15801

DATE of Notice: October 31, 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. Meholic  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641 x 5982

NOTIFICACION IMPORTANTE

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUERIDA 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 ASISTENCIA LEGAL.

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

**FILED**

**NOV 14 2006**

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

Washington Mutual Bank, FA  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2006-666-CD

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

TO: Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch, Jr., Last Record Owner  
339 Treasure Lake  
Dubois, PA 15801

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 *John J. Mullane*

- 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.

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



Washington Mutual Bank, FA  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2006-666-CD

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

TO: Any and All Unknown Heirs of  
Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch, Jr., Last Record Owner  
339 Treasure Lake  
Dubois, PA 15801

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 *John L. Shanahan 11/4/06*  
BD

- 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.

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

Washington Mutual Bank, FA  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

NO. 2006-666-CD

TO: Deborah L. DeChurch  
517 Locust Street  
Dubois, PA 15801

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.

Judgment by Default

Money Judgment

Judgment in Replevin

Judgment for Possession

Judgment on Award of Arbitration

Judgment on Verdict

Judgment on Court Findings

Prothonotary

*Will Udren 11/14/00  
Box*

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

Washington Mutual Bank FA  
Plaintiff(s)

No.: 2006-00666-CD

 COPY

Real Debt: \$107,657.98

Atty's Comm: \$

Vs.

Costs: \$

Vince A. DeChurch Jr. a/k/a  
Vincent A. DeChurch Jr. and  
Deborah L. DeChurch  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: November 14, 2006

Expires: November 14, 2011

Certified from the record this 14th day of November, 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**

Washington Mutual Bank, FA  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

## MORTGAGE FORECLOSURE

NO. 2006-666-CD

PRAECLPICE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Please issue Writ of Execution in the above matter:

Amount due \$107,657.98

Interest From 11/12/06 \_\_\_\_\_  
to Date of Sale \_\_\_\_\_  
*Ongoing Per Diem of \$17.18*  
to actual date of sale including if sale is  
held at a later date

(Costs to be added) \$ 139.00 Prothonotary costs

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE  
ATTORNEY FOR PLAINTIFF

**FILED**  
M 19 28 67  
NOV 14 2006

William A. Shaw  
Prothonotary/Clerk of Courts

64

**FILED**

**NOV 14 2006**

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

Washington Mutual Bank, FA  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

NO. 2006-666-CD

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**

Washington Mutual Bank, FA  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

## MORTGAGE FORECLOSURE

NO. 2006-666-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

Washington Mutual Bank, FA, 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: 339 Treasure Lake (Sandy Township), Dubois, PA 15801

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

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

Vince A. DeChurch, Jr. 339 Treasure Lake  
a/k/a Vincent A. DeChurch, Dubois, PA 15801  
Jr., Last Record Owner

Deborah L. DeChurch 517 Locust Street  
Dubois, PA 15801

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 \_\_\_\_\_

Washington Mutual Bank, FA      7800 N. 113th Street  
Milwaukee, WI 53224

PNC Bank National Assoc.

Consumer Loan Center  
2730 Liberty Avenue  
Pittsburgh, PA 15222

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,  
Department of Revenue

Bureau of Compliance, PO Box 281230  
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

339 Treasure Lake  
(Sandy Township)  
Dubois, PA 15801

Any and All Unknown Heirs  
of Vince A. DeChurch a/k/a  
Vincent A. DeChurch, Last  
Record Owner

339 Treasure Lake  
Dubois, PA 15801

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: November 11, 2006

~~Mark J. Udren, ESQ.  
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

Washington Mutual Bank, FA  
Plaintiff

v.

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2006-666-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: 339 Treasure Lake  
(Sandy Township)  
Dubois, PA 15801  
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$107,657.98  
139.00

Prothonotary costs

Interest From 11/12/06

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

Ongoing Per Diem of \$17.18

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

(Costs to be added) \$ \_\_\_\_\_

By Willie M. Udren  
Prothonotary  
Clerk

Date 11/14/06

COPY

COURT OF COMMON PLEAS  
NO. 2006-666-CD

=====

Washington Mutual Bank, FA  
vs.  
Vince A. DeChurch, Jr. a/k/a  
Vincent A. DeChurch, Jr., Last Record Owner  
Deborah L. DeChurch

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 107,657.98

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

from 11/12/06

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

Ongoing Per Diem of \$17.18

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

COSTS PAID:

PROTHY \$ 139.00

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

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

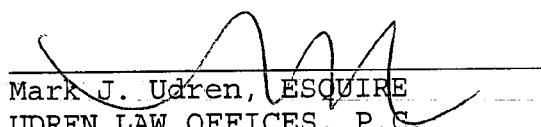
COSTS DUE PROTHY. \$ \_\_\_\_\_

PREMISES TO BE SOLD:

339 Treasure Lake

(Sandy Township)

Dubois, PA 15801

  
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 tracts of land designated as Lots Nos. 146 and 147, Section 15, "Bimini" in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Office in Misc. Docket Map File No. 25.

**EXCEPTING AND RESERVING therefrom and subject to:**

1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declaration of Restrictions, Treasure Lake, Inc., recorded in Misc. Book Vol. 146, page 476; all of said restrictions being covenants which run with the land.
3. All mineral and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Developer, or Treasure Lake Property Owners Association, Inc., which lien shall run with the land and be an encumbrance against it.

BEING the same premises which became vested in the Mortgagors herein by deed of James R. Hendricks and Annette M. Hendricks, dated October 30, 1998 and not yet recorded but intended to be prior to the recording of this mortgage.

BEING KNOWN AS: 339 TREASURE LAKE  
(SANDY TOWNSHIP)  
DUBOIS, PA 15801

PROPERTY ID NO.: 128-C02-015-147-00-21 CONTROL NO.: 128-0-96104

PROPERTY ID NO.: 128-C02-015-146-00-21 CONTROL NO.: 128-0-77940

TITLE TO SAID PREMISES IS VESTED IN VINCENT A. DECHURCH, JR. A/K/A VINCE A. DECHURCH, JR. AND DEBORAH L. DECHURCH, HUSBAND AND WIFE BY DEED FROM JAMES R. HENDRICKS AND ANNETTE M. HENDRICKS, HUSBAND AND WIFE DATED 10/30/1998 RECORDED 4/29/1999 IN INSTRUMENT NO. 199906733.

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

Washington Mutual Bank, FA  
7800 N. 113th Street  
Milwaukee, WI 53224  
Plaintiff

v.

Vince A. DeChurch, Jr. a/k/a  
Vincent A. DeChurch, Jr., Last  
Record Owner  
Deborah L. DeChurch  
517 Locust Street  
Dubois, PA 15801  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2006-666-CD

FILED NO CC  
M 11/23/07  
FEB 05 2007

William A. Shaw  
Prothonotary/Clerk of Courts

**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: January 31, 2007

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

Washington Mutual Bank, FA  
Plaintiff

v.

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch, Jr.,  
Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 2006-666-CD

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

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

OWNER(S): VINCE A. DeCHURCH, JR. AKA VINCENT A. DeCHURCH, JR.,  
LAST RECORD OWNER & DEBORAH L. DeCHURCH

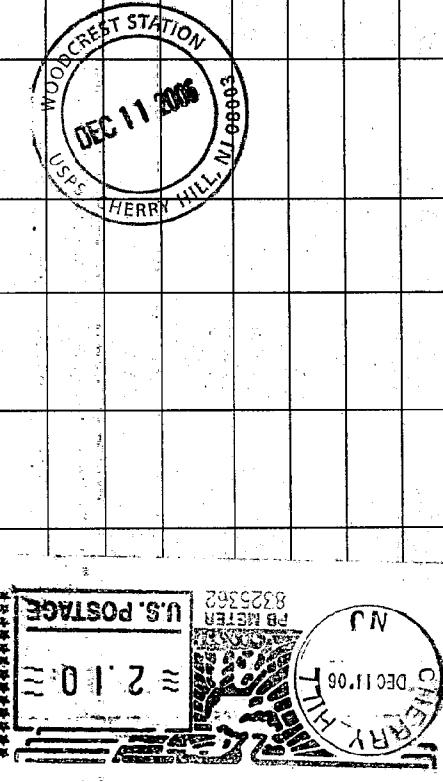
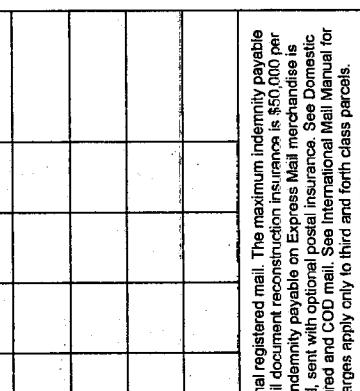
PROPERTY: 339 Treasure Lake (Sandy Township) Dubois, PA 15801

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on February 2, 2007, 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<br/>Of Sender</b>      |                   | <b>UDREN LAW OFFICES, P.C.<br/>WOODCREST CORPORATE CENTER<br/>111 WOODCREST ROAD<br/>CHERRY HILL, NEW JERSEY 08003</b>               |  | <input type="checkbox"/> Registered<br><input type="checkbox"/> Insured<br><input type="checkbox"/> COD<br><input type="checkbox"/> Certified |     | <input type="checkbox"/> Return Receipt for Merchandise<br><input type="checkbox"/> Int'l Registered Del<br><input type="checkbox"/> Express Mail |                           | <input type="checkbox"/> Registered Mail:<br><input type="checkbox"/> With Postal Insurance<br><input type="checkbox"/> Without postal Insurance |                      | <i>Postmark and Date of Receipt</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |             | <i>Affix stamp here if issued as certificate of mailing or for additional copies of this bill.</i> |                          |
|--------------------------------------------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------|--|-----------------------------------------------------------------------------------------------------------------------------------------------|-----|---------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|----------------------------------------------------------------------------------------------------|--------------------------|
| Line                                       | Article<br>Number | Name of Addressee, Street, and Post Office Address                                                                                   |  | Postage                                                                                                                                       | Fee | Handling<br>Charge                                                                                                                                | Act. Value<br>(if Reg'd.) | Insured<br>Value                                                                                                                                 | Duo Sender<br>if COD | R.R.<br>Fee                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | S.D.<br>Fee | S.H.<br>Fee                                                                                        | Rst. Del. Fee<br>Remarks |
| 1                                          | DeChurch          | CLEARFIELD COUNTY REAL ESTATE TAX DEPT. 1 N.<br>2 <sup>ND</sup> ST., STE 116, CLEARFIELD, PA 16830                                   |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 2                                          |                   | DOMESTIC RELATIONS SECTION 1 N. 2ND ST., STE<br>116, CLEARFIELD, PA 16830                                                            |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 3                                          | 06030352          | PA DEPT OF REV. BUREAU OF COMPLIANCE, P.O.<br>BOX 281230, HARRISBURG, PA 17128-1230                                                  |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 4                                          |                   | TENANTS/OCCUPANTS 339 TREASURE LAKE<br>(SANDY TWP) DUBOIS, PA 15801                                                                  |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 5                                          | 2006-666-<br>CLJ  | Washington Mutual Bank, FA 7800 N. 113th Street,<br>Milwaukee, WI 53224                                                              |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 6                                          |                   | PNC Bank NA Consumer Loan Ctr. 2730 Liberty Avenue,<br>Pittsburgh, PA 15222                                                          |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 7                                          | CLEAR<br>FIELD    | Any and All Unknown Heirs of Vincie A. DeChurch aka<br>Vincent A. DeChurch, Last Record Owner 339 Treasure<br>Lake, Dubois, PA 15801 |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 8                                          |                   |                                                                                                                                      |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 9                                          | HENNI             |                                                                                                                                      |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 10                                         |                   |                                                                                                                                      |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 11                                         | 02/02/2007        |                                                                                                                                      |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 12                                         |                   |                                                                                                                                      |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 13                                         |                   |                                                                                                                                      |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 14                                         |                   |                                                                                                                                      |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| 15                                         |                   |                                                                                                                                      |  |                                                                                                                                               |     |                                                                                                                                                   |                           |                                                                                                                                                  |                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |             |                                                                                                    |                          |
| Total number of Pieces<br>Listed by Sender |                   | Total Number of Pieces<br>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 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. |             |                                                                                                    |                          |

**EXHIBIT A**

**FILED**

**FEB 05 2007**

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20477  
NO: 06-666-CD

PLAINTIFF: WASHINGTON MUTUAL BANK, FA

vs.

DEFENDANT: VINCE A. DECHURCH, JR, A/K/A VINCENT A. DECHURCH JR., LAST RECORD OWNER AND  
DEBORAH L. DECHURCH

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 11/14/2006

LEVY TAKEN 12/05/2006 @ 12:40 PM

POSTED 12/05/2006 @ 12:40 PM

SALE HELD 02/02/2007

SOLD TO WASHINGTON MUTUAL BANK, FA

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 03/14/2007

DATE DEED FILED 03/14/2007

PROPERTY ADDRESS 339 TREASURE LAKE A/K/A 146 CARRIBEAN ROAD LOT 146 & 147 SECT 15 "BIMINI"  
DUBOIS , PA 15801

**SERVICES**

@ SERVED VINCE A. DECHURCH, JR.

DECEASED PER DEPUTY.

12/06/2006 @ 11:11 AM SERVED DEBORAH L. DECHURCH

SERVED DEBORAH L. DECHURCH, DEFENDANT, AT HER RESIDENCE 517 LOCUST STREET, DUBOIS, CLEARFIELD COUNTY,  
PENNSYLVANIA BY HANDING TO MICHELLE DECHURCH, DAUGHER OF THE DEFENDANT

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

FILED  
01/10/2007  
MAR 14 2007  
WAM  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20477  
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DEBORAH L. DECHURCH

Execution REAL ESTATE

**SHERIFF RETURN**

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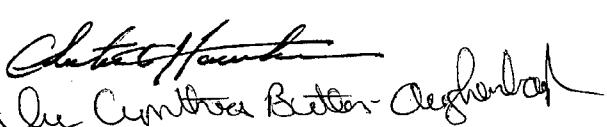
SHERIFF HAWKINS \$219.50

SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This

\_\_\_\_ Day of \_\_\_\_\_ 2007

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

Washington Mutual Bank, FA  
Plaintiff

v.

Vince A. DeChurch, Jr.  
a/k/a Vincent A. DeChurch,  
Jr., Last Record Owner  
Deborah L. DeChurch  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 2006-666-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: 339 Treasure Lake  
(Sandy Township)  
Dubois, PA 15801  
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$107,657.98  
134.00 Prothonotary costs

Interest From 11/12/06  
to Date of Sale \_\_\_\_\_  
Ongoing Per Diem of \$17.18  
to actual date of sale including if sale is  
held at a later date

(Costs to be added) \$ \_\_\_\_\_

By William J. Hanchard Prothonotary  
Clerk  
Date 11/14/06

Received November 14, 2006 @ 11:20 A.M.

Chester A. Hawkins  
by Cynthia Sitter-Caylenbach

COURT OF COMMON PLEAS  
NO. 2006-666-CD

=====

Washington Mutual Bank, FA  
vs.  
Vince A. DeChurch, Jr. a/k/a  
Vincent A. DeChurch, Jr., Last Record Owner  
Deborah L. DeChurch

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 107,657.98

INTEREST \$ \_\_\_\_\_  
from 11/12/06  
to Date of Sale \_\_\_\_\_  
Ongoing Per Diem of \$17.18  
to actual date of sale including if sale is  
held at a later date

COSTS PAID:  
PROTHY \$ 139.00

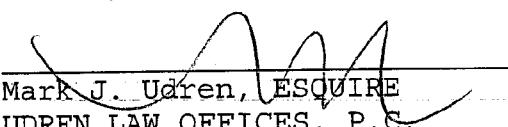
SHERIFF \$ \_\_\_\_\_

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

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

PREMISES TO BE SOLD:

339 Treasure Lake  
(Sandy Township)  
Dubois, PA 15801

  
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 tracts of land designated as Lots Nos. 146 and 147, Section 15, "Bimini" in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Recorder of Deeds Office in Misc. Docket Map File No. 25.

**EXCEPTING AND RESERVING therefrom and subject to:**

1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.

2. The Declaration of Restrictions, Treasure Lake, Inc., recorded in Misc. Book Vol. 146, page 476; all of said restrictions being covenants which run with the land.

3. All mineral and mining rights of every kind and nature.

4. A lien for all unpaid charges or assessments as may be made by Developer, or Treasure Lake Property Owners Association, Inc., which lien shall run with the land and be an encumbrance against it.

**BEING** the same premises which became vested in the Mortgagors herein by deed of James R. Hendricks and Annette M. Hendricks, dated October 30, 1998 and not yet recorded but intended to be prior to the recording of this mortgage.

BEING KNOWN AS: 339 TREASURE LAKE  
(SANDY TOWNSHIP)  
DUBOIS, PA 15801

PROPERTY ID NO.: 128-C02-015-147-00-21 CONTROL NO.: 128-0-96104

PROPERTY ID NO.: 128-C02-015-146-00-21 CONTROL NO.: 128-0-77940

TITLE TO SAID PREMISES IS VESTED IN VINCENT A. DECHURCH, JR. A/K/A VINCE A. DECHURCH, JR. AND DEBORAH L. DECHURCH, HUSBAND AND WIFE BY DEED FROM JAMES R. HENDRICKS AND ANNETTE M. HENDRICKS, HUSBAND AND WIFE DATED 10/30/1998 RECORDED 4/29/1999 IN INSTRUMENT NO. 199906733.

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME VINCE A. DECHURCH, JR.

NO. 06-666-CD

NOW, March 14, 2007, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on February 02, 2007, I exposed the within described real estate of Vince A. Dechurch, Jr, A/K/A Vincent A. Dechurch Jr., Last Record Owner And Deborah L. Dechurch to public venue or outcry at which time and place I sold the same to WASHINGTON MUTUAL BANK, FA 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                    | 16.91           |
| LEVY                       | 15.00           |
| MILEAGE                    | 16.91           |
| POSTING                    | 15.00           |
| CSDS                       | 10.00           |
| COMMISSION                 | 0.00            |
| POSTAGE                    | 4.68            |
| HANDBILLS                  | 15.00           |
| DISTRIBUTION               | 25.00           |
| ADVERTISING                | 15.00           |
| ADD'L SERVICE              |                 |
| DEED                       | 30.00           |
| ADD'L POSTING              |                 |
| ADD'L MILEAGE              |                 |
| ADD'L LEVY                 |                 |
| BID AMOUNT                 | 1.00            |
| RETURNS/DEPUTIZE           |                 |
| COPIES                     | 15.00           |
|                            | 5.00            |
| BILLING/PHONE/FAX          | 5.00            |
| CONTINUED SALES            |                 |
| MISCELLANEOUS              |                 |
| <b>TOTAL SHERIFF COSTS</b> | <b>\$219.50</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                | 107,657.98          |
| INTEREST @ 17.1800 %           | 1,408.76            |
| FROM 11/12/2006 TO 02/02/2007  |                     |
| PROTH SATISFACTION             |                     |
| LATE CHARGES AND FEES          |                     |
| COST OF SUIT-TO BE ADDED       |                     |
| FORECLOSURE FEES               |                     |
| ATTORNEY COMMISSION            |                     |
| REFUND OF ADVANCE              |                     |
| REFUND OF SURCHARGE            |                     |
| SATISFACTION FEE               | 40.00               |
| ESCROW DEFICIENCY              |                     |
| PROPERTY INSPECTIONS           |                     |
| INTEREST                       |                     |
| MISCELLANEOUS                  |                     |
| <b>TOTAL DEBT AND INTEREST</b> | <b>\$109,106.74</b> |

**COSTS:**

|                     |                   |
|---------------------|-------------------|
| ADVERTISING         | 1,290.00          |
| TAXES - COLLECTOR   |                   |
| TAXES - TAX CLAIM   |                   |
| DUE                 |                   |
| LIEN SEARCH         | 100.00            |
| ACKNOWLEDGEMENT     | 5.00              |
| DEED COSTS          | 29.00             |
| SHERIFF COSTS       | 219.50            |
| LEGAL JOURNAL COSTS | 180.00            |
| PROTHONOTARY        | 139.00            |
| MORTGAGE SEARCH     | 40.00             |
| MUNICIPAL LIEN      |                   |
| <b>TOTAL COSTS</b>  | <b>\$2,002.50</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