

06-818-CD
Citifinancial vs Helen I. Goodrow

Citifinancial vs Helen Goodrow
2006-818-CD

GOLDBECK McCAFFERTY & MCKEEVER

BY: JOSEPH A. GOLDBECK, JR.

ATTORNEY I.D. #16132

SUITE 5000 – MELLON INDEPENDENCE CENTER

701 MARKET STREET

PHILADELPHIA, PA 19106

(215) 825-6318

WWW.GOLDBECKLAW.COM

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL SERVICES INC.

14415 South 50th Street

Suite 100

Phoenix, AZ 85044

Plaintiff

vs.

HELEN I. GOODROW

Mortgagor and Real Owner

RR 1 Box 488

Woodland, PA 16881

Defendant

IN THE COURT OF COMMON PLEAS

OF CLEARFIELD COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

06-818-CD

Term

**CIVIL ACTION: MORTGAGE
FORECLOSURE**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claim in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

PENNSYLVANIA BAR ASSOCIATION

P.O. Box 186

Harrisburg, PA 17108

800-692-7375

KEYSTONE LEGAL SERVICES

211 1/2 E. Locust Street

Clearfield, PA 16830

814-765-9646

A V I S O

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESSARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESSARIO QUE USTED, O SU ABOGADO, REGISTRE CON LA CORTE EN FORMA ESCRITA, EL PUNTO DE VISTA DE USTED Y CUALQUIER OBJECCION CONTRA LAS QUEJAS EN ESTA DEMANDA.

FILED *Atty 85.00*
MAY 24 2006 2CC
William A. Shaw
Prothonotary/Clerk of Courts
IN Shaff

RECUERDE: SI USTED NO REPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIRA QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

USTED DEBE LLEVAR ÉSTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELÉFONO LA OFICINA FIJADA AQUÍ ABAJO. ESTA OFICINA PUEDE PROVEERÉ CON INFORMACIÓN DE CÓMO CONSEUIR UN ABOGADO.

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

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

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

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

Resources available for Homeowners in Foreclosure

ACT NOW!

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

- 1). Call an attorney. For referrals to a qualified attorney call either of the following numbers: 800-692-7375 or 814-765-9646.
- 2). Call the Consumer Credit Counseling Agency at 1-800-989-2227 for free counseling.
- 3). Visit HUD'S website www.hud.gov for Help for Homeowners Facing the Loss of Their Homes.
- 4). Call the Plaintiff (your lender) at 877-675-3656 and ask to speak to someone about Loss Mitigation or Home Retention options.
- 5). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout / Home Retention Package. Call Beth at 215-825-6329 or fax 215-825-6429. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is David Fein who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of CFNA-0339.

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

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

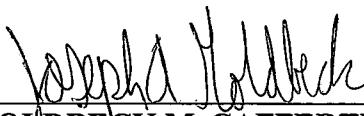
COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff is CITIFINANCIAL SERVICES INC., 14415 South 50th Street, Suite 100 Phoenix, AZ 85044.
2. The name and address of the Defendant is HELEN I. GOODROW, 1629 Dockweller Road, Woodland, PA 16881, who is the mortgagor and real owner of the mortgaged premises hereinafter described.
3. On June 23, 2003 mortgagor made, executed and delivered a mortgage upon the premises hereinafter described to CITIFINANCIAL SERVICES, INC., which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Instrument # 200311107. The Mortgage and assignment(s) are matters of public record and are incorporated by this reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g); which Rule relieves the Plaintiff from its obligation to attach documents to pleadings if those documents are matters of public record.
4. The Property subject to the Mortgage is more fully described in the legal description set forth as Exhibit "A" ("Property").
5. The mortgage is in default because the monthly payments of principal and interest are due and unpaid for December 01, 2005, and each month thereafter and by the terms of the Mortgage, upon default in such payments for a period of one month, the entire principal balance and all interest due and other charges are due and collectible.
6. The following amounts are due to Plaintiff on the Mortgage:

Principal Balance	\$35,940.06
Interest from 11/01/2005	\$1,831.68
through 05/31/2006 at 9.2400%	
Per Diem interest rate at \$8.64	
Reasonable Attorney's Fee	\$2,000.00
Late Charges from 12/01/2005 to 05/31/2006	\$222.89
Monthly late charge amount at \$37.15	
Costs of suit and Title Search	\$900.00
Appraisal Fee	\$225.00
	<hr/>
	\$41,119.63

7. Plaintiff is not seeking a judgment of personal liability (or and "in personam" judgment) against the Defendant in this Action but reserves it's right to bring a separate Action to establish that right; if such right exists. If Defendant has received a discharge of their personal liability in a Bankruptcy proceeding, this Action of Mortgage Foreclosure is, in no way, an attempt to re-establish the personal liability that was discharged in Bankruptcy, but only to foreclose the Mortgage and sell the Property pursuant to Pennsylvania law.
8. Notice of Intention to Foreclose and a Notice of Homeowners' Emergency Mortgage Assistance has been sent to Defendant by certified and regular mail, as required by Act 160 of 1998 of the Commonwealth of Pennsylvania, on the date(s) set forth in the true and correct copy of such notice(s) attached hereto as Exhibit "B". The Defendant has not had the required face-to-face meeting within the required time and Plaintiff has no knowledge of any such meeting being requested by the Defendant through the Plaintiff, the Pennsylvania Housing Finance Agency, or any appropriate Consumer Credit Counseling Agency.

WHEREFORE, Plaintiff demands a de terris judgment in mortgage foreclosure in the sum of \$41,119.63, together with interest at the rate of \$8.64, per day and other expenses costs and charges incurred by the Plaintiff which are properly chargeable in accordance with the terms of the Mortgage and Pennsylvania law until the Mortgage is paid in full, and for the foreclosure of the Mortgage and Sheriff's Sale of the Property.

By: 

GOLDBECK McCAFFERTY & McKEEVER

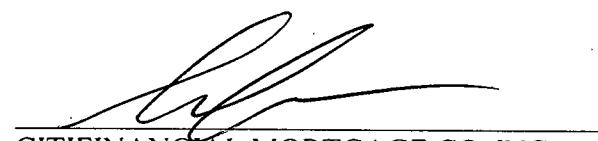
BY: JOSEPH A. GOLDBECK, JR., ESQUIRE

ATTORNEY FOR PLAINTIFF

VERIFICATION

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

Date: 5-22-06



CITIFINANCIAL MORTGAGE CO. INC.

Exhibit A

ALL that certain lot or piece of land situate in Bradford Township, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at an iron pin on the South side of Township Road Route No. T-611 and being common corner with land of the Grantors; thence North $50^{\circ} 09'$ East along said Township Road a distance of 295.6 feet to an iron pin on Township Road; thence South $36^{\circ} 10'$ East along land of Grantors a distance of 295.35 feet to an iron pin; thence still along land of Grantors South $50^{\circ} 09'$ West a distance of 295.6 feet to an iron pin; thence still along land of Grantors North $36^{\circ} 10'$ West a distance of 295.35 feet to an iron pin and place of beginning. Containing 2.0 acres as shown on the map attached hereto.

EXCEPTING and RESERVING all the exceptions and reservations as contained in the chain of title.

BEING a part of the same premises as vested in the Grantors by deed recorded in Deed Book 392, page 95 in the office of the Recorder of Deeds, Clearfield County, Pa.

Exhibit B

REPRESENTATION OF PRINTED DOCUMENT
7107 8381 6540 0505 9366

03665 000029
 HELEN I GOODROW
 RR1 BOX 488
 WOODLAND PA 16881

RE: CitiFinancial Loan#: 38-0268-0205260
 Property Address: RR1 BOX 488
 WOODLAND PA 16881

ACT 91 NOTICE
DATE OF NOTICE: February 5, 2006

**TAKE ACTION TO SAVE YOUR HOME FROM
 FORECLOSURE**

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

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

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

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

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

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

Prepared by: CITIFINANCIAL SERVICES, INC.
 280 COMMONS DRIVE
 DU BOIS PA 15801

REPRESENTATION OF PRINTED DOCUMENT

Date: February 5, 2006

Homeowners Name: HELEN I GOODROW
 Property Address: RR1 BOX 488
 WOODLAND PA 16881
 Loan Account No.: 38-0268-0205260
 Lender/Servicer: CITIFINANCIAL SERVICES, INC.

**HOMEOWNERS'
EMERGENCY MORTGAGE ASSISTANCE PROGRAM**

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

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

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

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

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

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

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

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

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

REPRESENTATION OF PRINTED DOCUMENT

complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your fact-to-face meeting.

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

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

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

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

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

NATURE OF THE DEFAULT - The Mortgage debt held by the above lender on your property located at: **RR1 BOX 488, WOODLAND PA 16881**
IS SERIOUSLY IN DEFAULT because:

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

- (a) Monthly payments (including late charges) from **12/01/05** through present.
- (b) Other charges; Escrow, Inspections, NSF Check
- (c) **TOTAL AMOUNT OF (a) and (b) REQUIRED AS OF THIS DATE \$3065.90**

HOW TO CURE THE DEFAULT - You may cure the default within **THIRTY (30) DAYS** of the date of this notice BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER WHICH IS \$3065.90 PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE **THIRTY (30) DAY PERIOD**. Payments must be made either by cash, cashier's check, certified check or money order made payable and send to

CITIFINANCIAL SERVICES, INC.,280 COMMONS DRIVE, DU BOIS PA 15801

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

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

REPRESENTATION OF PRINTED DOCUMENT

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

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

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

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

HOW TO CONTACT THE LENDER:

Name of Lender: CITIFINANCIAL SERVICES, INC.

Address: 280 COMMONS DRIVE
DU BOIS PA 15801

Phone Number: 814-371-8350

Contact Person: BRANCH MANAGER

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

ASSUMPTION OF MORTGAGE - You may not sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

REPRESENTATION OF PRINTED DOCUMENT

YOU MAY ALSO HAVE THE RIGHT:

- * TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- * TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- * TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- * TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS.
- * TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- * TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

If you are represented by an Attorney, please refer this letter to such Attorney and provide us with such Attorney's name, address and telephone number.

To the extent your obligations have been discharged, or are subject to an automatic stay of bankruptcy order under Title 11 of the United States Code, this notice is for compliance and informational purposes only and does not constitute a demand for payment or any attempt to collect any such obligation.

REPRESENTATION OF PRINTED DOCUMENT

PENNSYLVANIA HOUSING FINANCE AGENCY
HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM

CONSUMER CREDIT COUNSELING AGENCIES

CLEARFIELD COUNTY

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

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

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

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

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

GOLDBECK McCAFFERTY & McKEEVER
BY: MICHAEL T. MCKEEVER, ESQ.
ATTORNEY I.D. #56129
SUITE 5000 – MELLON INDEPENDENCE CENTER
701 MARKET STREET
PHILADELPHIA, PA 19106-1532
(215) 627-1322
ATTORNEY FOR PLAINTIFF

FILED

MAY 26 2006

n/12:30/06
William A. Shaw
Prothonotary/Clerk of Courts

CITIFINANCIAL SERVICES INC.

14415 South 50th Street
Suite 100
Phoenix, AZ 85044

Plaintiff

vs.

HELEN I. GOODROW
Mortgagor and Record Owner
RR 1 Box 488
Woodland, PA 16881

Defendant

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE
FORECLOSURE

Term
No. 06-818 CD

PRAECIPE TO CORRECT PROPERTY ADDRESS

Kindly correct the docket to reflect the correct property address of 1629 Dockweller Road
f/k/a RR 1 Box 487 Woodland, PA 16881.

Respectfully submitted,

GOLDBECK, McCAFFERTY & McKEEVER

By: Michael T. McKeever
Michael T. McKeever, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101569
NO: 06-818-CD
SERVICE # 1 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIFINANCIAL SERVICES INC.
VS.
DEFENDANT: HELEN I. GOODROW

SHERIFF RETURN

NOW, May 30, 2006 AT 9:39 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON HELEN I. GOODROW DEFENDANT AT 1629 DOC WELKER ROAD, WOODLAND, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO SUSAN GOODROW, DAUGHTER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING / HUNTER

FILED
92:25 AM
JUN 15 2006

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101569
NO: 06-818-CD
SERVICE # 2 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIFINANCIAL SERVICES INC.
VS.
DEFENDANT: HELEN I. GOODROW

SHERIFF RETURN

NOW, May 30, 2006 AT 9:39 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON HELEN I. GOODROW DEFENDANT AT 1629 DOC WELKER ROAD, WOODLAND, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO SUSAN GOODROW, DAUGHTER 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

DOCKET # 101569
NO: 06-818-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIFINANCIAL SERVICES INC.

vs.

DEFENDANT: HELEN I. GOODROW

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	259219	20.00
SHERIFF HAWKINS	GOLDBECK	259219	33.45

Sworn to Before Me This

____ Day of _____ 2006

So Answers,


Chester A. Hawkins
Sheriff

In the Court of Common Pleas of Clearfield County

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

Plaintiff

vs.

HELEN I. GOODROW

(Mortgagor(s) and Record Owner(s))
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

No. 06-818 CD

Defendant(s)

PRAECLPSE FOR JUDGMENT

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

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

Assess damages as follows:

\$41,548.17

Debt

Interest - 11/01/2005 to 07/11/2006

Total

(Assessment of Damages attached)

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

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

Joseph A. Goldbeck, Jr.
Attorney for Plaintiff
I.D. #16132

AND NOW July 13, 2006, Judgment is entered in favor of CITIFINANCIAL SERVICES INC. and against HELEN I. GOODROW by default for want of an Answer and damages assessed in the sum of \$41,548.17 as per the above certification.

Prothonotary

FILED Atty pd. 20.00
m/3/58834
JUL 13 2006 Notice to Def.

William A. Shaw
Prothonotary/Clerk of Courts

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

DATE OF THIS NOTICE: June 28, 2006

TO:

HELEN I. GOODROW
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

Plaintiff

vs.

HELEN I. GOODROW
(Mortgagor(s) and Record Owner(s))
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

Defendant(s)

IN THE COURT OF COMMON
PLEAS
of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE
FORECLOSURE

Term
No. 06-818 CD

TO: **HELEN I. GOODROW**
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

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

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


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

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

DATE OF THIS NOTICE: June 28, 2006

TO:

HELEN I. GOODROW
1629 Doc Welker Road
Woodland, PA 16881

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

Plaintiff

vs.

HELEN I. GOODROW
(Mortgagor(s) and Record Owner(s))
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

In the Court of Common Pleas
of Clearfield County

CIVIL ACTION - LAW

**ACTION OF
MORTGAGE FORECLOSURE**

Term
No. 06-818 CD

Defendant(s)

TO: **HELEN I. GOODROW**
1629 Doc Welker Road
Woodland, PA 16881

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

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

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

Joseph A. Goldbeck, Jr.
GOLDBECK McCAFFERTY & MCKEEVER
BY: Joseph A. Goldbeck, Jr., Esq.
Attorney for Plaintiff
Suite 5000 – 701 Market Street.
Philadelphia, PA 19106 215-825-6318

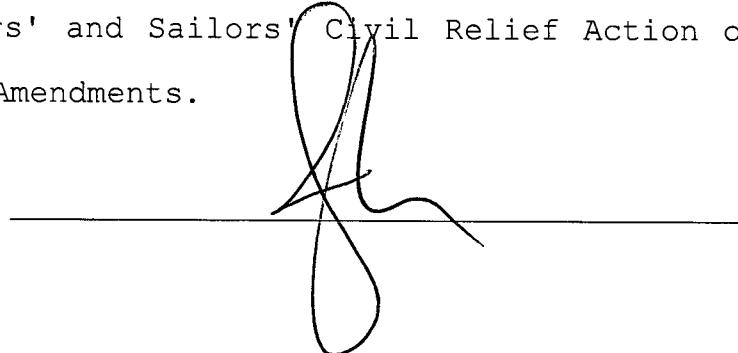
VERIFICATION OF NON-MILITARY SERVICE

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

1. That the above named Defendant, HELEN I. GOODROW, is about unknown years of age, that Defendant's last known residence is 1629 Doc Welker Road, Woodland, PA 16881, and is engaged in the unknown business located at unknown address.

2. That Defendant is not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Action of Congress of 1940 and its Amendments.

Date: _____

A handwritten signature in black ink, appearing to read "Helen I. Goodrow", is written over a horizontal line. The signature is fluid and cursive, with a large, stylized 'H' at the beginning.

GOLDBECK McCAFFERTY & McKEEVER
BY: Joseph A. Goldbeck, Jr.
Attorney I.D. #16132
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-627-1322
Attorney for Plaintiff

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

Plaintiff
vs.

HELEN I. GOODROW
(Mortgagor(s) and Record owner(s))
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION LAW

ACTION OF MORTGAGE FORECLOSURE

No. 06-818 CD

ORDER FOR JUDGMENT

Please enter Judgment in favor of CITIFINANCIAL SERVICES INC. and against HELEN I. GOODROW for failure to file an Answer in the above action within (20) days (or sixty (60) days if defendant is the United States of America) from the date of service of the Complaint, in the sum of \$41,548.17.

Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

I hereby certify that the above names are correct and that the precise residence address of the judgment creditor is CITIFINANCIAL SERVICES INC. 14415 South 50th Street Suite 100 Phoenix, AZ 85044 and that the name(s) and last known address(es) of the Defendant(s) is/are HELEN I. GOODROW, 1629 Doc Welker Road Woodland, PA 16881;

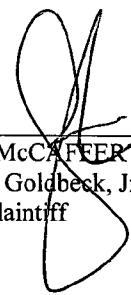
GOLDBECK McCAFFERTY & McKEEVER
BY: Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

ASSESSMENT OF DAMAGES

TO THE PROTHONOTARY:

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

Principal Balance	\$35,940.06
Interest from 11/01/2005 through 07/11/2006	\$2,185.92
Reasonable Attorney's Fee	\$2,000.00
 Late Charges	 \$297.19
Costs of Suit and Title Search	\$900.00
Escrow Balance Deficit	\$225.00
 \$41,548.17	


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

AND NOW, this 13th day of July, 2006 damages are assessed as above.


Pro Prothy

Rule of Civil Procedure No. 236 – Revised

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

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

Plaintiff

No. 06-818 CD

vs.

HELEN I. GOODROW
(**Mortgagors and Record Owner(s)**)
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

Defendant(s)

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

NOTICE

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

William Shaw
Prothonotary

By: William Shaw 7/13/06

Deputy

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

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

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

Citifinancial Services, Inc.
Plaintiff(s)

No.: 2006-00818-CD

Real Debt: \$41,548.17

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Helen I. Goodrow
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: July 13, 2006

Expires: July 13, 2011

Certified from the record this 13th day of July, 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

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

Joseph A. Goldbeck, Jr.
Attorney I.D.#16132
Suite 5000 - Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-627-1322
Attorney for Plaintiff

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

Plaintiff
vs.

HELEN I. GOODROW
Mortgagor(s) and Record Owner(s)
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

Defendant(s)

IN THE COURT OF COMMON PLEAS
of Clearfield County
CIVIL ACTION - LAW
ACTION OF MORTGAGE FORECLOSURE
No. 06-818 CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Issue Writ of Execution in the above matter:

Amount Due	
Interest from 11/01/2005 to 07/11/2006 at 9.2400%	<u>\$41,548.17</u>

(Costs to be added)

Prothonotary costs

125.00

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

FILED
M 14:00 5/13/2006 Atty pd. 20.00
JUL 13 2006 ICC @ 6 wnts

William A. Shaw
Prothonotary/Clerk of Courts
W/prop. deser.
to Shaff

(6K)

Term
No. 06-818 CD
IN THE COURT OF COMMON PLEAS

CITIFINANCIAL SERVICES INC.

vs.

HELEN I. GOODROW
(Mortgagor(s) and Record Owner(s))
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

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

Goldbeck McCafferty & McKeever
BY: Joseph A. Goldbeck, Jr.
Attorney I.D. #16132
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-627-1322
Attorney for Plaintiff

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

Plaintiff
vs.

HELEN I. GOODROW
(**Mortgagor(s) and Record Owner(s)**)
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

Defendant(s)

IN THE COURT OF COMMON PLEAS
of Clearfield County

CIVIL ACTION - LAW
ACTION OF MORTGAGE FORECLOSURE

No. 06-818 CD

AFFIDAVIT PURSUANT TO RULE 3129

CITIFINANCIAL SERVICES INC., Plaintiff in the above action, by its attorney, Joseph A. Goldbeck, Jr., Esquire, sets forth as of the date the praecipe for the writ of execution was filed the following information concerning the real property located at:

1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

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

HELEN I. GOODROW
1629 Doc Welker Road
Woodland, PA 16881

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

HELEN I. GOODROW
1629 Doc Welker Road
Woodland, PA 16881

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

DOMESTIC RELATIONS OF CLEARFIELD COUNTY
230 E. Market Street
Clearfield, PA 16830

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement
Health and Welfare Bldg. - Room 432
Harrisburg, PA 17105-2675

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

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

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

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

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF REVENUE INHERITANCE
TAX DIVISION

1131 Strawberry Square
6th Floor
Harrisburg, PA 17128

INTERNAL REVENUE SERVICE- SPECIAL PROCEDURES BRANCH
1001 LIBERTY AVENUE, 13TH FL
SUITE 1300
PITTSBURGH, PA 15222

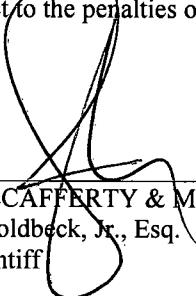
DEPARTMENT OF PUBLIC WELFARE
ESTATE RECOVERY PROGRAM
PO Box 8486, Willow Oak Building
Harrisburg, PA 17105-8486

TENANTS/OCCUPANTS
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

(attach separate sheet if more space is needed)

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

DATED: July 11, 2006


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

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

CC

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

vs.

HELEN I. GOODROW
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

In the Court of Common Pleas of
Clearfield County

No. 06-818 CD

WRIT OF EXECUTION
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield

To the Sheriff of Clearfield County, Pennsylvania

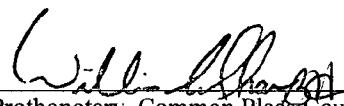
To satisfy the judgment, interest and costs in the above matter you are directed to levy upon and sell the following described property:

PREMISES: 1629 Dockweller Road f/k/a RR 1 Box 487 Woodland, PA 16881

See Exhibit "A" attached

AMOUNT DUE	
Interest From 11/01/2005 Through 07/11/2006	<u>\$41,548.17</u>
(Costs to be added)	
Prothonotary costs	<u>125.00</u>

Dated: 7/13/06


Prothonotary, Common Pleas Court
of Clearfield County, Pennsylvania

Deputy _____

Term
No. 06-818 CD

IN THE COURT OF COMMON PLEAS
CITIFINANCIAL SERVICES INC.

vs.

HELEN I. GOODROW
Mortgagor(s)
1629 Dockweller Road f/k/a RR 1 Box 487 Woodland, PA 16881

RECEIVED
WRT OF EXECUTION
(Mortgage Foreclosure)

REAL DEBT	\$41,548.17
INTEREST from	\$ _____
COSTS PAID:	
PROTHY	\$ 125.00
SHERIFF	\$ _____
STATUTORY	\$ _____
COSTS DUE PROTHY	\$ _____
Office of Judicial Support	
Judg. Fee	
Cr.	
Sat.	

Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

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

All that certain lot or piece of land situate in Bradford Township, Clearfield County, Pennsylvania, bounded and described as follows:

Beginning at an iron pin on the South side of Township Road Route No. T-611 and being common corner with land of the Grantors; thence North 50° 09' East along said Township Road a distance of 295.6 feet to an iron pin on Township Road; thence South 36° 10' East along land of Grantors a distance of 295.35 feet to an iron pin; thence still along land of Grantors South 50° 09' West a distance of 295.6 feet to an iron pin; thence still along land of Grantors North 36° 10' West a distance of 295.35 feet to an iron pin and place of beginning. Containing 2.0 acres as shown on the map attached hereto.

Excepting and reserving all the exceptions and reservations as contained in the chain of title.

Tax parcel no: 106-n07-000-00060

GOLDBECK McCAFFERTY & MCKEEVER
BY: Joseph A. Goldbeck, Jr.
Attorney I.D.#16132
Suite 5000 - Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532
215-627-1322
Attorney for Plaintiff

CFNA-0339
CF: 05/24/2006
SD: 10/06/2006
\$41,548.17

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

Plaintiff
vs.

HELEN I. GOODROW
Mortgagor(s) and
Record Owner(s)

1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term
No. 06-818 CD

FILED NO
M 12 4 2006
SEP 22 2006
UN

William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE
PURSUANT TO Pa.R.C.P. 3129.2 (c) (2)

Joseph A. Goldbeck, Jr., Esquire, Attorney for Plaintiff, hereby certifies that service on the Defendants of the Notice of Sheriff Sale was made by:

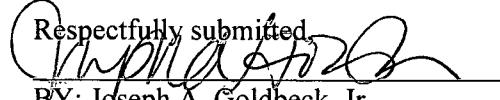
() Personal Service by the Sheriff's Office/competent adult (copy of return attached).
(~~✓~~) Certified mail by Joseph A. Goldbeck, Jr. (original green Postal return receipt attached).
() Certified mail by Sheriff's Office.
() Ordinary mail by Joseph A. Goldbeck, Jr., Esquire to Attorney for Defendant(s) of record (proof of mailing attached).
() Acknowledgment of Sheriff's Sale by Attorney for Defendant(s) (proof of acknowledgment attached).
() Ordinary mail by Sheriff's Office to Attorney for Defendant(s) of record.

IF SERVICE WAS ACCOMPLISHED BY COURT ORDER.

() Premises was posted by Sheriff's Office/competent adult (copy of return attached).
() Certified Mail & ordinary mail by Sheriff's Office (copy of return attached).
() Certified Mail & ordinary mail by Joseph A. Goldbeck, Jr. (original receipt(s) for Certified Mail attached).

Pursuant to the Affidavit under Rule 3129 (copy attached), service on all lienholders (if any) has been made by ordinary mail by Joseph A. Goldbeck, Jr., Esquire (copies of proofs of mailing attached).

The undersigned understands that the statements herein are subject to the penalties provided by 18 P.S. Section 4904.

Respectfully submitted,

BY: Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

9554
9552
5482
3000
0000
0110
3110
5000
7000

CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$ Yes
Certified Fee	Yes
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	7.28
Total Postage & Fees	\$ CFNA-0359-076
GOODROW, HELEN L.	
Sent To 1629 Dockweller Road f/k/a	
Street, Apt. No. Woodland, PA 16881 or PO Box No.	
City, State, ZIP+4	

PS Form 3801-7 10-2002

CONTINENTAL POSTAL STORE
2006
Postmark
1 Here
901644-076

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry. Internet access to delivery information is not available on mail addressed to APOs and FPOs.

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

3.03	
Postage	\$
Certified Fee	Yes
Return Receipt Fee (Endorsement Required)	Yes
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 7.28

7005 3110 0003 5482 9563

7005 Sent To CFNA 0339 10/6
GOODROW, HELEN I.
Street, Apt. No. 1629 Doc Weicker Road
or PO Box No.
City, State, ZIP-4 Woodland, PA 16881

CONTINENTAL POSTAL STORE
PA 19106
Postmark Here
2006

PA 19106
10/6/2006

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

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- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry. Internet access to delivery information is not available on mail addressed to APOs and FPOs.

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:
CFNA-0339 10/6

GOODROW, HELEN I.
1629 Dockweller Road f/k/a RR
Woodland, PA 16881

2. Article Number
(Transfer from service label)

* 7 0 0 5 3 1 1 0 0 0 0 3 5 4 8 2 9 5 5 6 *

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

HeLEN GOODROW Agent Addressee

B. Received by (Printed Name)

HeLEN GOODROW 8/14/00 **C. Date of Delivery**

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

3. Service Type

<input 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.

4. Restricted Delivery? (Extra Fee) Yes

UNITED STATES POSTAL SERVICE



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

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

GOLDBECK McCAFFERTY & MCKEEVER
Suite 5000
Mellon Independence Center
701 Market Street
Philadelphia, PA 19106

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:
CFNA-0339 10/6

**GOODROW, HELEN I.
1629 Doc Welker Road
Woodland, PA 16881**

2. Article Number
(Transfer from service label)

* 7 0 0 5 3 1 1 0 0 0 0 3 5 4 8 2 9 5 6 3 *

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X Helen Goodrow

Agent
 Addressee

B. Received by (Printed Name)

Helen Goodrow 8/14/06

C. Date of Delivery

Yes
If YES, enter delivery address below: No

3. Service Type

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

4. Restricted Delivery? (Extra Fee) Yes

UNITED STATES POSTAL SERVICE



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

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

GOLDBECK McCAFFERTY & McKEEVER
Suite 5000
Mellon Independence Center
701 Market Street
Philadelphia, PA 19106

Name and Address of Sender
GOLDBECK
SUITE 5000
701 MARKET STREET
PHILADELPHIA, PA
19106-1532

Check type of mail or service:

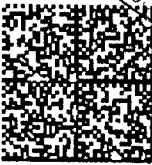
- Certified
- COD
- Delivery Confirmation
- Express Mail
- Insured
- Recorded Delivery (International)
- Registered
- Return Receipt for Merchandise
- Signature Confirmation

Affix Stamp
 (If issued as
 certificate of
 additio
 of this bill)
 Postmark :
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UNITED STATES POSTAGE
 15¢
 PITNEY BOWES

\$ 01.80
 AUG 11 2006
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Recipient (Name, Street, City, State, & ZIP Code)

Article Number

DOMESTIC RELATIONS OF CLEARFIELD
COUNTY
230 E. Market Street
Clearfield, PA 16830

Postage

PA DEPARTMENT OF PUBLIC WELFARE -
 Bureau of Child Support Enforcement
 Health and Welfare Bldg. - Room 432
 Harrisburg, PA 17105-2675

TAX DIVISION

COMMONWEALTH OF PENNSYLVANIA
 DEPARTMENT OF REVENUE INHERITANCE

1131 Strawberry Square

6th Floor

Harrisburg, PA 17128

PITTSBURGH, PA 15222

INTERNAL REVENUE SERVICE- SPECIAL

PROCEDURES BRANCH

1001 LIBERTY AVENUE, 13TH FL

SUITE 1300

HARRISBURG, PA 17105-8486

DEPARTMENT OF PUBLIC WELFARE

ESTATE RECOVERY PROGRAM

PO Box 8486, Willow Oak Building

HARRISBURG, PA 17105-8486

TENANTS/OCCUPANTS

1629 Dockweller Road f/k/a RR 1 Box 487

WOODLAND, PA 16881

7.

8.

Total Number of Pieces
 Listed by Sender

Total Number of Pieces
 Received at Post Office

Postmaster, Per (Name of receiving employee)

Complete by Typewriter, Ink, or Ball Point Pen

See Privacy Act Statement on Reverse

Clearfield

GOLDBECK McCAFFERTY & McKEEVER

BY: Joseph A. Goldbeck, Jr.
Attorney I.D.#16132
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-825-6320
Attorney for Plaintiff

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

Plaintiff

vs.

HELEN I. GOODROW
Mortgagor(s) and Record Owner(s)

1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term
No. 06-818 CD

AFFIDAVIT PURSUANT TO RULE 3129

CITIFINANCIAL SERVICES INC., Plaintiff in the above action, by its attorney, Joseph A. Goldbeck, Jr., Esquire, sets forth as of the date the praecipe for the writ of execution was filed the following information concerning the real property located at:

1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

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

HELEN I. GOODROW
1629 Doc Welker Road
Woodland, PA 16881

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

HELEN I. GOODROW
1629 Doc Welker Road
Woodland, PA 16881

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

DOMESTIC RELATIONS OF CLEARFIELD COUNTY
230 E. Market Street
Clearfield, PA 16830

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement
Health and Welfare Bldg. - Room 432
Harrisburg, PA 17105-2675

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

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

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

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

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF REVENUE INHERITANCE
TAX DIVISION
1131 Strawberry Square
6th Floor
Harrisburg, PA 17128

INTERNAL REVENUE SERVICE- SPECIAL PROCEDURES BRANCH
1001 LIBERTY AVENUE, 13TH FL
SUITE 1300
PITTSBURGH, PA 15222

DEPARTMENT OF PUBLIC WELFARE
ESTATE RECOVERY PROGRAM
PO Box 8486, Willow Oak Building
Harrisburg, PA 17105-8486

TENANTS/OCCUPANTS
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

(attach separate sheet if more space is needed)

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

DATED: September 14, 2006



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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20399
NO: 06-818-CD

PLAINTIFF: CITIFINANCIAL SERVICES INC.

VS.

DEFENDANT: HELEN I. GOODROW

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 07/14/2006

LEVY TAKEN 08/15/2006 @ 11:11 AM

POSTED 08/15/2006 @ 11:11 AM

SALE HELD 10/06/2006

SOLD TO CITIFINANCIAL SERVICES INC.

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 10/17/2006

DATE DEED FILED 10/17/2006

PROPERTY ADDRESS 1629 DOCWELLER ROAD F/K/A RR 1, BOX 487 WOODLAND , PA 16881

SERVICES

08/22/2006 @ 3:19 PM SERVED HELEN I. GOODROW

SERVED HELEN I. GOODROW, DEFENDANT, AT THE CLEARFIELD COUNTY SHERIFF'S OFFICE, 1 NORTH SECOND STREET, SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO HELEN GOODROW

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 *pa 05.00*
0/2/15 cm
OCT 17 2006 *UN*

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20399
NO: 06-818-CD

PLAINTIFF: CITIFINANCIAL SERVICES INC.

vs.

DEFENDANT: HELEN I. GOODROW

Execution REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS \$216.83

SURCHARGE \$20.00 PAID BY ATTORNEY

Sworn to Before Me This

____ Day of _____ 2006

So Answers,

Chester Hawkins
by Andrew Bitter-Augenthaler
Chester A. Hawkins
Sheriff

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

CITIFINANCIAL SERVICES INC.
14415 South 50th Street
Suite 100
Phoenix, AZ 85044

In the Court of Common Pleas of
Clearfield County

vs.

HELEN I. GOODROW
1629 Dockweller Road f/k/a RR 1 Box 487
Woodland, PA 16881

No. 06-818 CD

WRIT OF EXECUTION
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield

To the Sheriff of Clearfield County, Pennsylvania

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

PREMISES: 1629 Dockweller Road f/k/a RR 1 Box 487 Woodland, PA 16881

See Exhibit "A" attached

AMOUNT DUE	\$41,548.17
Interest From 11/01/2005 Through 07/11/2006	
(Costs to be added)	
Prothonotary costs	125.00

Dated: 7/13/06


Prothonotary, Common Pleas Court
of Clearfield County, Pennsylvania

Deputy _____

Received July 14, 2006 @ 11:30 A.M.
Chester A. Hawkins
By Amhera Butler-Aughenbaugh

Term
No. 06-818 CD

IN THE COURT OF COMMON PLEAS
CITIFINANCIAL SERVICES INC.

vs.

HELEN I. GOODROW

Mortagor(s)
1629 Dockweller Road f/k/a RR 1 Box 487 Woodland, PA 16881

WRIT OF EXECUTION

(Mortgage Foreclosure)

\$41,548.17
\$ _____

REAL DEBT
INTEREST from
COSTS PAID:

\$25.00
\$ _____
\$ _____

PROTHY
SHERIFF
STATUTORY
COSTS DUE PROTHY
Office of Judicial Support
Judg. Fee
Cr.
Sat.

Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

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

All that certain lot or piece of land situate in Bradford Township, Clearfield County, Pennsylvania, bounded and described as follows:

Beginning at an iron pin on the South side of Township Road Route No. T-611 and being common corner with land of the Grantors; thence North $50^{\circ} 09'$ East along said Township Road a distance of 295.6 feet to an iron pin on Township Road; thence South $36^{\circ} 10'$ East along land of Grantors a distance of 295.35 feet to an iron pin; thence still along land of Grantors South $50^{\circ} 09'$ West a distance of 295.6 feet to an iron pin; thence still along land of Grantors North $36^{\circ} 10'$ West a distance of 295.35 feet to an iron pin and place of beginning. Containing 2.0 acres as shown on the map attached hereto.

Excepting and reserving all the exceptions and reservations as contained in the chain of title.

Tax parcel no: 106-n07-000-00060

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME HELEN I. GOODROW

NO. 06-818-CD

NOW, October 17, 2006, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on October 06, 2006, I exposed the within described real estate of Helen I. Goodrow to public venue or outcry at which time and place I sold the same to CITIFINANCIAL SERVICES INC. he/she being the highest bidder, for the sum of \$1.00 plus costs and made the following appropriations, viz:

SHERIFF COSTS:

PLAINTIFF COSTS, DEBT AND INTEREST:

RDR SERVICE	15.00	DEBT-AMOUNT DUE	41,548.17
MILEAGE	15.00	INTEREST @ 10.5200 %	3,566.28
LEVY	4.45	FROM 11/01/2005 TO 10/06/2006	
MILEAGE	15.00		
POSTING	4.45	PROTH SATISFACTION	
CSDS	15.00	LATE CHARGES AND FEES	
COMMISSION	10.00	COST OF SUIT-TO BE ADDED	
POSTAGE	0.00	FORECLOSURE FEES	
HANDBILLS	4.68	ATTORNEY COMMISSION	
DISTRIBUTION	15.00	REFUND OF ADVANCE	
ADVERTISING	25.00	REFUND OF SURCHARGE	20.00
ADD'L SERVICE	15.00	SATISFACTION FEE	
DEED	30.00	ESCROW DEFICIENCY	
ADD'L POSTING		PROPERTY INSPECTIONS	
ADD'L MILEAGE	22.25	INTEREST	
ADD'L LEVY		MISCELLANEOUS	
BID AMOUNT	1.00		
RETURNS/DEPUTIZE		TOTAL DEBT AND INTEREST	\$45,134.45
COPIES	15.00		
	5.00		
BILLING/PHONE/FAX	5.00	COSTS:	
CONTINUED SALES		ADVERTISING	342.34
MISCELLANEOUS		TAXES - COLLECTOR	611.57
TOTAL SHERIFF COSTS	\$216.83	TAXES - TAX CLAIM	
		DUE	
		LIEN SEARCH	100.00
		ACKNOWLEDGEMENT	5.00
		DEED COSTS	28.50
		SHERIFF COSTS	216.83
		LEGAL JOURNAL COSTS	144.00
ACKNOWLEDGEMENT	5.00	PROTHONOTARY	125.00
REGISTER & RECORDER	28.50	MORTGAGE SEARCH	40.00
TRANSFER TAX 2%	0.00	MUNICIPAL LIEN	
TOTAL DEED COSTS	\$28.50	TOTAL COSTS	\$1,613.24

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