



PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000 \_\_\_\_\_ 124141

ATTORNEY FOR PLAINTIFF

TCIF BAR, LLC  
500 ENTERPRISE ROAD  
SUITE 150  
HORSHAM, PA 19044-0969

COURT OF COMMON PLEAS

CIVIL DIVISION

Plaintiff

TERM

v.

NO. 06-873-CD

CLEARFIELD COUNTY

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

Defendant

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

**FILED** rec Shff  
MAY 31 2006 Any pd. 85.00  
William A. Shaw  
Prothonotary/Clerk of Courts

**NOTICE**

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

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

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

Deputy Prothonotary  
File #: 124141

October 13, 2006 Document  
Reinstated/Reinstated to Sheriff/Attorney  
for service.

Deputy Prothonotary

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

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

1. Plaintiff is

TCIF BAR, LLC  
500 ENTERPRISE ROAD  
SUITE 150  
HORSHAM, PA 19044-0969

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

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

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

3. On 02/11/2004 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., AS NOMINEE FOR ARLINGTON CAPITAL MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No: 200402346. By Assignment of Mortgage recorded 04/21/04 the mortgage was Assigned To SIB MORTGAGE CORPORATION which Assignment is recorded in Assignment Of Mortgage Instrument No: 200406013. PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 11/01/2005 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.



## LEGAL DESCRIPTION

ALL that certain piece or parcel of land situate in the Village of Bethlehem, Township of Bell, County of Clearfield, Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the center of public highway leading from Bethlehem to New Washington and Northwest corner of one-half now or formerly of Bertha Lee;

THENCE through center of Lot No. 2 and along line of this part conveyed to Bertha Lee, South 22.5 degrees West 130 feet;

THENCE North 61 degrees West 105 feet to a post;

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SUBJECT to all exceptions, reservations, restrictions and conditions which may appear of record.

BEING the same premises which were conveyed to James E. Flanagan and Virginia A. Flanagan, husband and wife, by deed of John F. Bennett, single, dated July 29, 1996, and recorded in the Office of the Recorder of Deeds in and for Clearfield County in Deed Book Volume 1776 at page

PROPERTY BEING: 12068 RIDGE ROAD

**VERIFICATION**

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for PLAINTIFF in this matter, that Plaintiff is outside the jurisdiction of the court and or the Verification could not be obtained within the time allowed for the filing on the pleading, that he is authorized to make this verification pursuant to Pa. R. C. P. 1024 ( c ) and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of his knowledge, information and belief. Furthermore, it is counsel's intention to substitute a verification from Plaintiff as soon as it is received by counsel .

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



---

FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

DATE: 5/30/6

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # 101597

TCIF BAR, LLC

Case # 06-873-CD

vs.

VIRGINIA A. FLANAGAN aka VIRGINIA DILLON

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW July 11, 2006 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO VIRGINIA A. FLANAGAN AKA VIRGINIA DILLON, DEFENDANT. SEVERAL ATTEMPTS, NOT HOME.

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PHELAN	508014	10.00
SHERIFF HAWKINS	PHELAN	508014	90.00
SHERIFF HAWKINS	"	519109	38.81

FILED  
9:21:30 AM  
JUL 21 2006

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before me This

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

\_\_\_\_\_

So Answers,

*Chester A. Hawkins*  
*by Mark H. Harr*  
Chester A. Hawkins  
Sheriff

PHELAN HALLINAN & SCHMIEG, LLP  
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CLEARFIELD COUNTY

v.

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

Defendant

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

MAY 31 2006

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

Attest.

*William A. Shaw*  
Prothonotary/  
Clerk of Courts

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**we hereby certify the  
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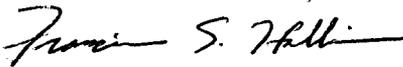
6. The following amounts are due on the mortgage:

Principal Balance	\$48,230.04
Interest	2,809.62
10/01/2005 through 05/30/2006 (Per Diem \$11.61)	
Attorney's Fees	1,250.00
Cumulative Late Charges	77.95
02/11/2004 to 05/30/2006	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 52,917.61
Escrow	
Credit	0.00
Deficit	595.15
Subtotal	<u>\$ 595.15</u>
<b>TOTAL</b>	<b>\$ 53,512.76</b>

7. The attorney's fees set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 53,512.76, together with interest from 05/30/2006 at the rate of \$11.61 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP



By: /s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

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FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

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

5/30/6

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ATTORNEY FOR PLAINTIFF

TCIF BAR, LLC

Plaintiff

vs.

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON

Defendants

: COURT OF COMMON PLEAS

: CIVIL DIVISION

: CLEARFIELD COUNTY

: No. 06-873-CD

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

TO THE PROTHONOTARY:

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

PHELAN HALLINAN & SCHMIEG, LLP

By: Francis S. Hallinan

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

Date: July 31, 2006

/jmr, Svc Dept.  
File# 124141

**FILED**

AUG 02 2006

*W/12:20 PM*  
William A. Shaw  
Prothonotary/Clerk of Courts

*1 copy to ATTL*

*2 minutes conveyed  
to SHPL*

PHELAN HALLINAN & SCHMIEG, LLP  
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Defendant

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**COMPLAINT IN MORTGAGE FORECLOSURE**

**FILED**  
MAY 18 2006

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Attest.  
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we hereby certify for service.  
within to be a true and  
correct copy of the  
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Aug 2, 2006 Document  
Reinstated/Reissued to Sheriff/Attorney  
Deputy Prothonotary

ATTORNEY FILE COPY  
PLEASE RETURN

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3. On 02/11/2004 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., AS NOMINEE FOR ARLINGTON CAPITAL MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No: 200402346. By Assignment of Mortgage recorded 04/21/04 the mortgage was Assigned To SIB MORTGAGE CORPORATION which Assignment is recorded in Assignment Of Mortgage Instrument No: 200406013. PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 11/01/2005 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

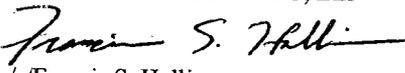
6. The following amounts are due on the mortgage:

Principal Balance	\$48,230.04
Interest	2,809.62
10/01/2005 through 05/30/2006 (Per Diem \$11.61)	
Attorney's Fees	1,250.00
Cumulative Late Charges	77.95
02/11/2004 to 05/30/2006	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 52,917.61
Escrow	
Credit	0.00
Deficit	595.15
Subtotal	<u>\$ 595.15</u>
<b>TOTAL</b>	<b>\$ 53,512.76</b>

7. The attorney's fees set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 53,512.76, together with interest from 05/30/2006 at the rate of \$11.61 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By:   
/s/Francis S. Hallinan  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

7

## LEGAL DESCRIPTION

ALL that certain piece or parcel of land situate in the Village of Bethlehem, Township of Bell, County of Clearfield, Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the center of public highway leading from Bethlehem to New Washington and Northwest corner of one-half now or formerly of Bertha Lee;

THENCE through center of Lot No. 2 and along line of this part conveyed to Bertha Lee, South 22.5 degrees West 130 feet;

THENCE North 61 degrees West 105 feet to a post;

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SUBJECT to all exceptions, reservations, restrictions and conditions which may appear of record.

BEING the same premises which were conveyed to James E. Flanagan and Virginia A. Flanagan, husband and wife, by deed of John F. Bennett, single, dated July 29, 1996, and recorded in the Office of the Recorder of Deeds in and for Clearfield County in Deed Book Volume 1776 at page

PROPERTY BEING: 12068 RIDGE ROAD

7

**VERIFICATION**

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for PLAINTIFF in this matter, that Plaintiff is outside the jurisdiction of the court and or the Verification could not be obtained within the time allowed for the filing on the pleading, that he is authorized to make this verification pursuant to Pa. R. C. P. 1024 ( c ) and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of his knowledge, information and belief. Furthermore, it is counsel's intention to substitute a verification from Plaintiff as soon as it is received by counsel .

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



FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

DATE: 5/30/6

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101789  
NO: 06-873-CD  
SERVICE # 1 OF 1  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: TCIF BAR, LLC  
vs.  
DEFENDANT: VIRGINIA A. FLANAGAN aka VIRGINIA DILLON

SHERIFF RETURN

NOW, August 02, 2006, SHERIFF OF ALLEGHENY COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON VIRGINIA A. FLANAGAN aka VIRGINIA DILLON.

NOW, August 30, 2006 ATTEMPTED TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON VIRGINIA A. FLANAGAN aka VIRGINIA DILLON, DEFENDANT. THE RETURN OF ALLEGHENY COUNTY IS HERETO **ATTACHED** AND MADE PART OF THIS RETURN MARKED "NOT FOUND".

FILED  
AUG 30 2006  
m/2:15/w  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101789  
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SHERIFF RETURN

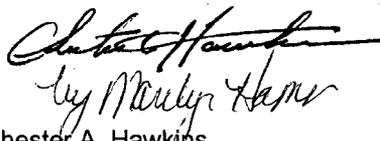
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	522898	10.00
SHERIFF HAWKINS	PHELAN	522898	11.00
ALLEGHENY CO.	PHELAN	522890	50.00
SHEILA O'BRIEN	PHELAN	522906	5.00

Sworn to Before Me This

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

So Answers,



Chester A. Hawkins  
Sheriff

**ALLEGHENY COUNTY SHERIFF'S DEPARTMENT**

436 GRANT STREET  
PITTSBURGH, PA 15219-2496  
PHONE (412) 350-4700  
FAX (412) 350-6388

101789

**PETER R. DEFAZIO**  
Sheriff

**WILLIAM MULLEN**  
Chief Deputy

128784

PLAINTIFF: **FCIF BAR, LLC**

CASE#: **06-873-CD**

VS.

EXPIRES: \_\_\_\_\_

DEFT.: **VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON**

SUMMONS/PRAECIPE

SEIZURE OR POSSESSION

NOTICE AND COMPLAINT

REVIVAL OR SCI FA

INTERROGATORIES

EXECUTION • LEVY OR GARNISHEE

OTHER \_\_\_\_\_

10

DEFT.: \_\_\_\_\_

DEFT.: \_\_\_\_\_

GARNISHEE: \_\_\_\_\_

ADDRESS: **1145 FOX HILL DR., APT 307**  
**MONROEVILLE, PA 15146**

MUNICIPALITY OR CITY WARD: \_\_\_\_\_

ATTY: **FRANCIS S. HALLINAN, ESQUIRE**

DATE: **7/31** 20 **06**

ADDRESS: **1 PENN CENTER AT SUBURBAN STATION, STE 1400**  
**PHILADELPHIA, PA 19103**

ATTY'S PHONE: **215 563 7000**

INDICATE TYPE OF SERVICE:  PERSONAL  PERSON IN CHARGE  DEPUTIZE  MAIL  POSTED  OTHER  LEVY  SEIZED & STORED

NOW: August 2 20 06, I, SHERIFF OF ALLEGHENY COUNTY, PA do hereby deputize the Sheriff of Allegheny County to execute this Writ and make return thereof according to law

**NOTE: ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN** - Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession, after notifying person of levy or attachment, with out liability on the part of such deputy herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

Seize, levy, advertise and sell all the personal property of the defendant on the premises located at: \_\_\_\_\_

MAKE MODEL MOTOR NUMBER SERIAL NUMBER LICENSE NUMBER

**SHERIFF'S OFFICE USE ONLY**

I hereby CERTIFY and RETURN that on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock, A.M./P.M. Address Above/ Address Below, County of Allegheny, Pennsylvania

I have served in the manner Described below:

- Defendant(s) personally served.
- Adult family member with whom said Defendant(s) reside(s). Name & Relationship \_\_\_\_\_
- Adult in charge of Defendant's residence who refused to give name or relationship. \_\_\_\_\_
- Manager/other person authorized to accept deliveries of United States Mail \_\_\_\_\_
- Agent or person in charge of Defendant(s) office or usual place of business. \_\_\_\_\_

- Other \_\_\_\_\_
- Property Posted \_\_\_\_\_

Defendant not found because:  Moved  Unknown  No Answer  Vacant  Other \_\_\_\_\_

Certified Mail  Receipt \_\_\_\_\_  Envelope Returned \_\_\_\_\_  Neither receipt or envelope returned: writ expired \_\_\_\_\_

Regular Mail Why \_\_\_\_\_

You are hereby notified that on \_\_\_\_\_, \_\_\_\_\_, levy was made in the case of \_\_\_\_\_ Possession/Sale has been set for \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ o'clock

**YOU MUST CALL DEPUTY ON THE MORNING OF SALE/POSSESSION BETWEEN 8:30 - 9:30 A.M.**

ATTEMPTS \_\_\_\_\_

Additional Costs Due \$ \_\_\_\_\_, This is placed on writ when returned to Prothonotary. Please check before satisfying case.

Affirmed and subscribed before me this AUG 15 day of 2006

**PETER R. DEFAZIO, Sheriff**

BY: \_\_\_\_\_ (DEPUTY)

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal  
Sheila R. O'Brien, Notary Public  
City of Pittsburgh, Allegheny County  
My Commission Expires June 19, 2008

DISTRICT: \_\_\_\_\_

*Sheila R. O'Brien*  
Notary

Member, Pennsylvania Association of Notaries

White Copy - Sheriff

Pink Copy - Attorney



CHESTER A. HAWKINS  
SHERIFF

# Sheriff's Office Clearfield County

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

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

ROBERT SNYDER  
CHIEF DEPUTY

MARILYN HAMM  
DEPT. CLERK

CYNTHIA AUGHENBAUGH  
OFFICE MANAGER

PETER F. SMITH  
SOLICITOR

## DEPUTATION

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

PAGE 101789

TERM & NO. 06-873-CD

TCIF BAR, LLC

COMPLAINT IN MORTGAGE FORECLOSURE

vs.

VIRGINIA A. FLANAGAN aka VIRGINIA DILLON

**SERVE BY: 09/01/06**

### MAKE REFUND PAYABLE TO PHELAN HALLINAN & SCHMIEG, ESQ.

**SERVE:** VIRGINIA A. FLANAGAN aka VIRGINIA DILLON

**ADDRESS:** 1145 FOX HILL DRIVE, APT 307, MONROEVILLE, PA 15146

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby deputize the SHERIFF OF ALLEGHENY COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, August 02, 2006.

RESPECTFULLY,

CHESTER A. HAWKINS,  
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

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

124141

ATTORNEY FOR PLAINTIFF

TCIF BAR, LLC  
500 ENTERPRISE ROAD  
SUITE 150  
HORSHAM, PA 19044-0969

Plaintiff

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 06-873-CD

CLEARFIELD COUNTY

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

Defendant

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

**FILED**  
MAY 31 2006

William A. Shaw  
Prothonotary/Clerk of Courts

**NOTICE**

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

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

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

By certifying this to be a true and attested copy of the original statement filed in this case.

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

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

AUG 02 2006

Attest.

*William A. Shaw*  
Prothonotary/  
Clerk of Courts

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

Aug 2, 2006 Document Reinstated/Reissued to Sheriff/Attorney for service.

*William A. Shaw*  
Deputy Prothonotary

ATTORNEY FILE COPY  
PLEASE RETURN

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
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ATTORNEY FOR PLAINTIFF

TCIF BAR, LLC  
500 ENTERPRISE ROAD  
SUITE 150  
HORSHAM, PA 19044-0969

COURT OF COMMON PLEAS

CIVIL DIVISION

Plaintiff

TERM

v.

NO.

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

CLEARFIELD COUNTY

Defendant

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

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

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

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

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1. Plaintiff is

TCIF BAR, LLC  
500 ENTERPRISE ROAD  
SUITE 150  
HORSHAM, PA 19044-0969

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

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

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

3. On 02/11/2004 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., AS NOMINEE FOR ARLINGTON CAPITAL MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No: 200402346. By Assignment of Mortgage recorded 04/21/04 the mortgage was Assigned To SIB MORTGAGE CORPORATION which Assignment is recorded in Assignment Of Mortgage Instrument No: 200406013. PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same.
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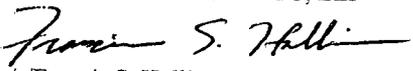
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7. The attorney's fees set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged.
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WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 53,512.76, together with interest from 05/30/2006 at the rate of \$11.61 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By:   
/s/Francis S. Hallinan  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

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THENCE through center of Lot No. 2 and along line of this part conveyed to Bertha Lee, South 22.5 degrees West 130 feet;

THENCE North 61 degrees West 105 feet to a post;

THENCE North 22.5 degrees East 130 feet to center of public highway leading from Bethlehem to New Washington;

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PROPERTY BEING: 12068 RIDGE ROAD

**VERIFICATION**

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---

FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

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

5/30/6

COPY

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
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Defendant

FILED  
MAY 31 2006

William A. Shaw  
Prothonotary/Clerk of Courts

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

**NOTICE**

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

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

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

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

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

Notice to Defend:  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5983

AUG 02 2006

Attest:

*William A. Shaw*  
Prothonotary/  
Clerk of Courts

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

AUG 2, 2006

Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

*[Signature]*  
Deputy Prothonotary

ATTORNEY FILE COPY  
PLEASE RETURN

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000 \_\_\_\_\_ 124141

ATTORNEY FOR PLAINTIFF

TCIF BAR, LLC  
500 ENTERPRISE ROAD  
SUITE 150  
HORSHAM, PA 19044-0969

COURT OF COMMON PLEAS

CIVIL DIVISION

Plaintiff

TERM

v.

NO.

CLEARFIELD COUNTY

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

Defendant

**CIVIL ACTION - LAW**  
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814-765-2641 x 5982

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

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

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

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

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1. Plaintiff is

TCIF BAR, LLC  
500 ENTERPRISE ROAD  
SUITE 150  
HORSHAM, PA 19044-0969

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

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

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

3. On 02/11/2004 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., AS NOMINEE FOR ARLINGTON CAPITAL MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No: 200402346. By Assignment of Mortgage recorded 04/21/04 the mortgage was Assigned To SIB MORTGAGE CORPORATION which Assignment is recorded in Assignment Of Mortgage Instrument No: 200406013. PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 11/01/2005 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

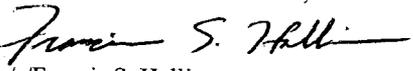
6. The following amounts are due on the mortgage:

Principal Balance	\$48,230.04
Interest	2,809.62
10/01/2005 through 05/30/2006 (Per Diem \$11.61)	
Attorney's Fees	1,250.00
Cumulative Late Charges	77.95
02/11/2004 to 05/30/2006	
Cost of Suit and Title Search	<u>\$ 550.00</u>
Subtotal	\$ 52,917.61
Escrow	
Credit	0.00
Deficit	595.15
Subtotal	<u>\$ 595.15</u>
<b>TOTAL</b>	<b>\$ 53,512.76</b>

7. The attorney's fees set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the Mortgage is reinstated prior to the Sale, reasonable attorney's fees will be charged.
8. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 53,512.76, together with interest from 05/30/2006 at the rate of \$11.61 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By:   
/s/Francis S. Hallinan  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

## LEGAL DESCRIPTION

ALL that certain piece or parcel of land situate in the Village of Bethlehem, Township of Bell, County of Clearfield, Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the center of public highway leading from Bethlehem to New Washington and Northwest corner of one-half now or formerly of Bertha Lee;

THENCE through center of Lot No. 2 and along line of this part conveyed to Bertha Lee, South 22.5 degrees West 130 feet;

THENCE North 61 degrees West 105 feet to a post;

THENCE North 22.5 degrees East 130 feet to center of public highway leading from Bethlehem to New Washington;

THENCE along center of said public highway East 61 degrees South 105 feet to the lace of beginning and being known as one-half of Lot No. 2 and all of Lot No. 3 in the J. W. Lee section of the Village of Bethlehem.

SUBJECT to all exceptions, reservations, restrictions and conditions which may appear of record.

BEING the same premises which were conveyed to James E. Flanagan and Virginia A. Flanagan, husband and wife, by deed of John F. Bennett, single, dated July 29, 1996, and recorded in the Office of the Recorder of Deeds in and for Clearfield County in Deed Book Volume 1776 at page

PROPERTY BEING: 12068 RIDGE ROAD

**VERIFICATION**

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for PLAINTIFF in this matter, that Plaintiff is outside the jurisdiction of the court and or the Verification could not be obtained within the time allowed for the filing on the pleading, that he is authorized to make this verification pursuant to Pa. R. C. P. 1024 ( c ) and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of his knowledge, information and belief. Furthermore, it is counsel's intention to substitute a verification from Plaintiff as soon as it is received by counsel .

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



FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

DATE: 5/30/6

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

ATTORNEY FOR PLAINTIFF

TCIF BAR, LLC

Plaintiff

vs.

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON

Defendants

: COURT OF COMMON PLEAS  
:  
: CIVIL DIVISION  
:  
: CLEARFIELD COUNTY  
:  
: No. 06-873-CD  
:  
:  
:

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

TO THE PROTHONOTARY:

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

PHELAN HALLINAN & SCHMIEG, LLP

By: Francis S. Hallinan

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

Date: September 15, 2006

/jmr, Svc Dept.  
File# 124141

**FILED** Atty pd. 7.00  
012:43:16N  
SEP 18 2006 1 Compl. Reinstated  
to Atty  
@K

William A. Shaw  
Prothonotary/Clerk of Courts



FILED <sup>NO CC</sup>  
M 11 16 06  
SEP 26 2006 @

William A. Shaw  
Prothonotary/Clerk of Courts

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

Attorney for Plaintiff

TCIF Bar, LLC :  
:  
:  
vs. :  
:  
Virginia A. Flanagan, a/k/a :  
Virginia Dillon :

COURT OF COMMON PLEAS  
CIVIL DIVISION  
CLEARFIELD COUNTY  
NO. 06-873-CD

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

Plaintiff, by its counsel, Phelan Hallinan & Schmieg, L.L.P., moves this Honorable Court for an Order directing service of the Complaint upon the above-captioned Defendant(s), Virginia A. Flanagan, a/k/a Virginia Dillon and , by first class mail and certified mail to the last known address 1145 Fox Hill Drive, Apt. 307, Monroeville, PA 15146 and the mortgaged premises, 12068 Ridge Road, Mahaffey, PA 15757, and in support thereof avers the following:

1. Attempts to serve Defendant, Virginia A. Flanagan, a/k/a Virginia Dillon, with the Complaint have been unsuccessful. The Sheriff of Clearfield County attempted to serve the Defendant at the mortgaged premises, 12068 Ridge Road, Mahaffey, PA 15757. As indicated by the Sheriff's Return of Service attached hereto as Exhibit "A", the deputy made several attempts to serve this complaint but there was no answer on all occasions.
2. The Sheriff of Clearfield County deputized the Sheriff of Allegheny County in an attempt to serve the Defendant at 1145 Fox Hill Drive, Apt. 307, Monroeville, PA 15146. However, the Defendant moved from this address as indicated by the Sheriff's Return of Service attached hereto as Exhibit "B".

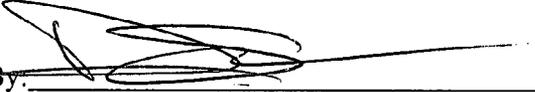
3. Pursuant to Pa.R.C.P. 430, Plaintiff has made a good faith effort to locate the Defendant. An Affidavit of Reasonable Investigation setting forth the specific inquiries made and the results is attached hereto as Exhibit "B".

4. Plaintiff has reviewed its internal records and has not been contacted by the Defendant as of September 25, 2006 to bring loan current.

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

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

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

By:   
Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Date: September 25, 2006



In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # 101597

TCIF BAR, LLC

Case # 06-873-CD

vs.

VIRGINIA A. FLANAGAN aka VIRGINIA DILLON

COPY

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW July 11, 2006 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO VIRGINIA A. FLANAGAN AKA VIRGINIA DILLON, DEFENDANT. SEVERAL ATTEMPTS, NOT HOME.

SERVED BY: /

Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	PHELAN	508014	10.00
SHERIFF HAWKINS	PHELAN	508014	90.00
SHERIFF HAWKINS			38.81

Sworn to Before me This

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

\_\_\_\_\_

So Answers,



Chester A. Hawkins  
Sheriff



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101789  
NO: 06-873-CD  
SERVICE # 1 OF 1  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: TCIF BAR, LLC  
vs.  
DEFENDANT: VIRGINIA A. FLANAGAN aka VIRGINIA DILLON

COPY

SHERIFF RETURN

---

NOW, August 02, 2006, SHERIFF OF ALLEGHENY COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON VIRGINIA A. FLANAGAN aka VIRGINIA DILLON.

NOW, August 30, 2006 ATTEMPTED TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON VIRGINIA A. FLANAGAN aka VIRGINIA DILLON, DEFENDANT. THE RETURN OF ALLEGHENY COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN MARKED "NOT FOUND".

**ALLEGHENY COUNTY SHERIFF'S DEPARTMENT**

436 GRANT STREET  
PITTSBURGH, PA 15219-2496  
PHONE (412) 350-4700  
FAX (412) 350-6388

128784

8/7

PETER R. DEFAZIO  
Sheriff

WILLIAM MULLEN  
Chief Deputy

PLAINTIFF: **PCIF BAR, LLC**

CASE#: **06-873-CD**

VS.

EXPIRES: \_\_\_\_\_

DEFT: **VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON**

SUMMONS/PRAECIPE

SEIZURE OR POSSESSION

NOTICE AND COMPLAINT

REVIVAL OR SCI FA

INTERROGATORIES

EXECUTION • LEVY OR GARNISHEE

OTHER \_\_\_\_\_

DEPT: \_\_\_\_\_

DEPT: \_\_\_\_\_

GARNISHEE: \_\_\_\_\_

ADDRESS: **1145 FOX HILL DR., APT 307  
MONROEVILLE, PA 15146**

MUNICIPALITY OR CITY WARD: \_\_\_\_\_

ATTY: **FRANCIS S. HALLINAN, ESQUIRE**

DATE: **7/31** 20 **06**

ADDRESS: **1 PENN CENTER AT SUBURBAN STATION, STE 1400  
PHILADELPHIA, PA 19103**

ATTY'S PHONE: **215 563 7000**

INDICATE TYPE OF SERVICE:  PERSONAL  PERSON IN CHARGE  DEPUTIZE  MAIL  POSTED  OTHER  LEVY  SEIZED & STORED

NOW: August 2 20 06, I, SHERIFF OF ALLEGHENY COUNTY, PA do hereby deputize the Sheriff of Allegheny County to execute this Writ and make return thereof according to law

**NOTE: ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN** - Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession, after notifying person of levy or attachment, with out liability on the part of such deputy herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

Seize, levy, advertise and sell all the personal property of the defendant on the premises located at: \_\_\_\_\_

MAKE MODEL MOTOR NUMBER SERIAL NUMBER LICENSE NUMBER

**SHERIFF'S OFFICE USE ONLY**

I hereby CERTIFY and RETURN that on the 10th day of August, 2006 at 8:00 o'clock, A.M./P.M. Address Above/ Address Below, County of Allegheny, Pennsylvania

I have served in the manner Described below:

- Defendant(s) personally served.
  - Adult family member with whom said Defendant(s) reside(s). Name & Relationship \_\_\_\_\_
  - Adult in charge of Defendant's residence who refused to give name or relationship.
  - Manager/other person authorized to accept deliveries of United States Mail \_\_\_\_\_
  - Agent or person in charge of Defendant(s) office or usual place of business.
  - Other \_\_\_\_\_
  - Property Posted \_\_\_\_\_
- Defendant not found because:  Moved  Unknown  No Answer  Vacant  Other \_\_\_\_\_
- Certified Mail  Receipt  Envelope Returned \_\_\_\_\_  Neither receipt or envelope returned: writ expired \_\_\_\_\_
- Regular Mail Why \_\_\_\_\_

You are hereby notified that on \_\_\_\_\_, levy was made in the case of \_\_\_\_\_  
Possession/Sale has been set for \_\_\_\_\_, 20 \_\_\_\_\_ at \_\_\_\_\_ o'clock

**YOU MUST CALL DEPUTY ON THE MORNING OF SALE/POSSESSION BETWEEN 8:30 - 9:30 A.M.**

ATTEMPTS \_\_\_\_\_

Additional Costs Due \$ \_\_\_\_\_, This is placed on writ when returned to Prothonotary. Please check before satisfying case.

Affirmed and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_ 20 \_\_\_\_\_

**PETER R. DEFAZIO, Sheriff**

BY: \_\_\_\_\_ (DEPUTY)

DISTRICT: \_\_\_\_\_

Shirley Robinson  
Notary

White Copy - Sheriff

Pink Copy - Attorney



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

File Number: 124141  
Attorney Firm: **Phelan, Hallinan & Schmieg, LLP**  
Subject: Virginia A. Flanagan

Property Address: 12068 Ridge Road, Mahaffey, PA 15757  
Possible Additional Mailing: 1145 Fox Hill Drive, Apt. 307, Monroeville, PA 15146

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

**I. CREDIT INFORMATION**

**A. SOCIAL SECURITY NUMBER**

Our search verified the following information to be true and correct

Virginia A. Flanagan - 211-62-6504

**B. EMPLOYMENT SEARCH**

Virginia A. Flanagan - A review of the credit reporting agencies provided no employment information.

**C. INQUIRY OF CREDITORS**

Our inquiry of creditors indicated that Virginia A. Flanagan reside(s) at: 12068 Ridge Road, Mahaffey, PA 15757.

**II. INQUIRY OF TELEPHONE COMPANY**

**A. DIRECTORY ASSISTANCE SEARCH**

Our office contacted directory assistance, which indicated that Virginia A. Flanagan reside(s) at: 12068 Ridge Road, Mahaffey, PA 15757. On 07-28-06 our office made several telephone calls to the subject's phone number, (814) 277-4472 and received the following information: phone disconnected.

**III. INQUIRY OF NEIGHBORS**

On 07-28-06 our office attempted to contact Glen E. Lee, at 12035 Ridge Road, Mahaffey, PA 15757, (814) 277-6304 and received the following information: spoke with an unidentified female who could not confirm or deny that the subject reside(s) at 12068 Ridge Road, Mahaffey, PA 15757.

On 07-28-06 our office made several phone calls in an attempt to contact Thomas C. Bouch, at 12071 Ridge Road, Mahaffey, PA 15757, (814) 277-4504 and received the following information: answering machine.

On 07-28-06 our office made several phone calls in an attempt to contact Thomas J. Caffrey, at 1145 Fox Hill Drive, Apt. 307, Monroeville, PA 15146, (412) 373-1542 and received the following information: answering machine.

IV. ADDRESS INQUIRY

A. NATIONAL ADDRESS UPDATE

On 07-28-06 we reviewed the National Address database and found the following information: Virginia A. Flanagan- 1145 Fox Hill Drive, Apt. 307, Monroeville, PA 15146.

B. ADDITIONAL ACTIVE MAILING ADDRESSES

Per our inquiry of creditors, the following is a possible mailing address: 1145 Fox Hill Drive, Apt. 307, Monroeville, PA 15146.

V. DRIVERS LICENSE INFORMATION

A. MOTOR VEHICLE & DMV OFFICE

Per the PA Department of Motor Vehicles, we were unable to obtain address information on Virginia A. Flanagan.

VI. OTHER INQUIRIES

A. DEATH RECORDS

As of 07-28-06 Vital Records and all public databases have no death record on file for Virginia A. Flanagan.

B. COUNTY VOTER REGISTRATION

The county voter registration was unable to confirm a registration for Virginia A. Flanagan residing at: last registered address.

VII. ADDITIONAL INFORMATION OF SUBJECT

A. DATE OF BIRTH

Virginia A. Flanagan - 12-12-1964

B. A.K.A.

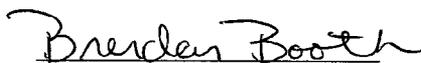
Ginger Flanagan AKA Virginia Dillon

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

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

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

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



AFFIANT - Brendan Booth  
Full Spectrum Legal Services, Inc.

Sworn to and subscribed before me this 28<sup>th</sup> day of July 2006.

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

klb

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

THOMAS P. STRAIN, Notary Public

City of Philadelphia, Phila. County

My Commission Expires February, 2007



**VERIFICATION**

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

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

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

By:   
Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Date: September 25, 2006

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

Attorney for Plaintiff

TCIF Bar, LLC

COURT OF COMMON PLEAS

:  
:  
:

CIVIL DIVISION

Vs.

:

CLEARFIELD COUNTY

Virginia A. Flanagan, a/k/a  
Virginia Dillon

:

NO. 06-873-CD

**CERTIFICATION OF SERVICE**

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

Virginia A. Flanagan, a/k/a Virginia Dillon at:

12068 Ridge Road  
Mahaffey, PA 15757

1145 Fox Hill Drive, Apt. 307  
Monroeville, PA 15146

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

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

By: 

Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Date: September 15, 2006

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

ATTORNEY FOR PLAINTIFF

TCIF BAR, LLC

COURT OF COMMON PLEAS

Plaintiff

CIVIL DIVISION

vs.

CLEARFIELD COUNTY

VIRGINIA A. FLANAGAN A/K/A VIRGINIA  
DILLON

No. 06-873-CD

Defendants

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

TO THE PROTHONOTARY:

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

PHELAN HALLINAN & SCHMIEG, LLP

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

Date: October 12, 2006

/jmr, Svc Dept.  
File# 124141

**FILED** Atty pd. 7.00  
m 11:05 AM  
OCT 13 2006 2 Compl.  
Reinstated  
to Shff  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DKT PG. 101789

TCIF BAR, LC

NO. 06-873-CD

-VS-

VIRGINIA A. FLANAGAN aka

COMPLAINT IN MORTGAGE FORECLOSURE

**AMENDED**  
SHERIFF'S RETURN

NOW OCTOBER 30, 2006 CHANGE SHERIFF HAWKINS COSTS FROM \$11.00 TO \$12.00

SWORN TO BEFORE ME THIS

\_\_\_\_ DAY OF \_\_\_\_\_ 2006

\_\_\_\_\_

So Answers

*Chester Hawkins*  
*by Nancy Harris*

CHESTER A. HAWKINS  
SHERIFF

**FILED**  
9/11:40 am  
OCT 31 2006

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102037  
NO: 06-873-CD  
SERVICE # 1 OF 1  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: TCIF BAR, LLC  
vs.  
DEFENDANT: VIRGINIA A. FLANAGAN aka VIRGINIA DILLON

**SHERIFF RETURN**

---

NOW, October 19, 2006, SHERIFF OF JEFFERSON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON VIRGINIA A. FLANAGAN aka VIRGINIA DILLON.

NOW, November 01, 2006 AT 4:00 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON VIRGINIA A. FLANAGAN aka VIRGINIA DILLON, DEFENDANT. THE RETURN OF JEFFERSON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

**FILED**  
01/30/2007  
JAN 30 2007  
(W)

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102037  
NO: 06-873-CD  
SERVICES 1  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: TCIF BAR, LLC  
vs.  
DEFENDANT: VIRGINIA A. FLANAGAN aka VIRGINIA DILLON

SHERIFF RETURN

RETURN COSTS

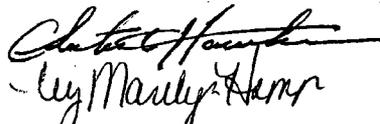
Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	543183	10.00
SHERIFF HAWKINS	PHELAN	543183	12.00
JEFFERSON CO.	PHELAN	543190	73.46

Sworn to Before Me This

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

\_\_\_\_\_

So Answers,



Chester A. Hawkins  
Sheriff

No. 06-873 C.D.

Personally appeared before me, Bill Dombrowski, Deputy for Thomas A. Demko, Sheriff of Jefferson County, Pennsylvania, who according to law deposes and says that on November 1, 2006 at 4:00 o'clock P.M. served the Notice and Complaint in Mortgage Foreclosure upon VIRGINIA FLANAGAN, a/k/a VIRGINIA DILLON, Defendant, at the address of 303 East Liberty Street, Borough of Punxsutawney, County of Jefferson, State of Pennsylvania, by handing to Wilma, mother of the defendant and adult person in charge at time of service, a true copy of the Notice and Complaint and by making known to her the contents thereof.

Advance Costs Received:	\$125.00	
My Costs:	71.46	Paid
Prothy:	2.00	
Total Costs:	73.46	
REFUNDED:	\$ 51.54	

So Answers,

Sworn and subscribed  
to before me this 2nd  
day of Nov. 1 2006  
By Kenya J. Leibt  
my Commission expires  
the 1st Mon. Jan. 2010.

Bill Dombrowski Deputy

Thomas A. Demko Sheriff

JEFFERSON COUNTY, PENNSYLVANIA

10-13-06 Document  
Reinstated/Received to Sheriff/Attorney  
for service. *William A. Shaw*  
~~Deputy~~ Prothonotary

9-18-06 Document  
Reinstated/Received to Sheriff/Attorney  
for service. *William A. Shaw*  
~~Deputy~~ Prothonotary

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000 124141

ATTORNEY FOR PLAINTIFF

**COPY**

TCIF BAR, LLC  
500 ENTERPRISE ROAD  
SUITE 150  
HORSHAM, PA 19044-0969

COURT OF COMMON PLEAS

CIVIL DIVISION

Plaintiff

TERM

v.

NO. 06-873-CD

CLEARFIELD COUNTY

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

Defendant

**FILED**  
MAY 31 2006

William A. Shaw  
Prothonotary/Clerk of Courts

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

**NOTICE**

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

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

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

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

Notice to Defend:  
David S. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 1082

**ATTORNEY FILE COPY** ▸  
**PLEASE RETURN**

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

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000 \_\_\_\_\_ 124141

ATTORNEY FOR PLAINTIFF

TCIF BAR, LLC  
500 ENTERPRISE ROAD  
SUITE 150  
HORSHAM, PA 19044-0969

COURT OF COMMON PLEAS

CIVIL DIVISION

Plaintiff

TERM

v.

NO.

CLEARFIELD COUNTY

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

Defendant

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

**NOTICE**

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

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

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

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

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

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

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

1. Plaintiff is

TCIF BAR, LLC  
500 ENTERPRISE ROAD  
SUITE 150  
HORSHAM, PA 19044-0969

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

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

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

3. On 02/11/2004 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., AS NOMINEE FOR ARLINGTON CAPITAL MORTGAGE CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No: 200402346. By Assignment of Mortgage recorded 04/21/04 the mortgage was Assigned To SIB MORTGAGE CORPORATION which Assignment is recorded in Assignment Of Mortgage Instrument No: 200406013. PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 11/01/2005 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.



## LEGAL DESCRIPTION

ALL that certain piece or parcel of land situate in the Village of Bethlehem, Township of Bell, County of Clearfield, Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the center of public highway leading from Bethlehem to New Washington and Northwest corner of one-half now or formerly of Bertha Lee;

THENCE through center of Lot No. 2 and along line of this part conveyed to Bertha Lee, South 22.5 degrees West 130 feet;

THENCE North 61 degrees West 105 feet to a post;

THENCE North 22.5 degrees East 130 feet to center of public highway leading from Bethlehem to New Washington;

THENCE along center of said public highway East 61 degrees South 105 feet to the lace of beginning and being known as one-half of Lot No. 2 and all of Lot No. 3 in the J. W. Lee section of the Village of Bethlehem.

SUBJECT to all exceptions, reservations, restrictions and conditions which may appear of record.

BEING the same premises which were conveyed to James E. Flanagan and Virginia A. Flanagan, husband and wife, by deed of John F. Bennett, single, dated July 29, 1996, and recorded in the Office of the Recorder of Deeds in and for Clearfield County in Deed Book Volume 1776 at page

PROPERTY BEING: 12068 RIDGE ROAD

**VERIFICATION**

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for PLAINTIFF in this matter, that Plaintiff is outside the jurisdiction of the court and or the Verification could not be obtained within the time allowed for the filing on the pleading, that he is authorized to make this verification pursuant to Pa. R. C. P. 1024 ( c ) and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of his knowledge, information and belief. Furthermore, it is counsel's intention to substitute a verification from Plaintiff as soon as it is received by counsel .

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



FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

DATE:

5/30/6



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

ATTORNEY FOR PLAINTIFF

TCIF BAR, LLC

Plaintiff

: COURT OF COMMON PLEAS

Vs.

: CIVIL DIVISION

: CLEARFIELD COUNTY

VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON

Defendants

: NO. 06-873-CD

TO: VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON  
1145 FOX HILL DRIVE, APT. 307  
MONROEVILLE, PA 15146

FILE COPY

DATE OF NOTICE: NOVEMBER 22, 2006

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

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

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

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

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

  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

PHELAN HALLINAN AND SCHMIEG  
By: Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
Daniel G. Schmieg, Esq., Id. No. 62205

ATTORNEY FOR PLAINTIFF

One Penn Center Plaza, Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

TCIF BAR, LLC

: COURT OF COMMON PLEAS

Plaintiff

: CIVIL DIVISION

Vs.

: CLEARFIELD COUNTY

VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON

Defendants

: NO. 06-873-CD

TO: VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON  
303 EAST LIBERTY STREET  
PUNXSUTAWNEY, PA 15767

**FILE COPY**

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

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

  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff

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

ATTORNEY FOR PLAINTIFF

TCIF BAR, LLC : COURT OF COMMON PLEAS  
Plaintiff :  
Vs. : CIVIL DIVISION  
: CLEARFIELD COUNTY  
VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON :  
Defendant : NO. 06-873-CD

TO: VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

**FILE COPY**

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**IMPORTANT NOTICE**

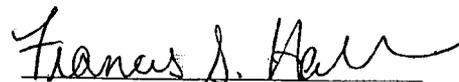
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CLEARFIELD COUNTY  
DAVID S. MEHOLICK, COURT  
ADMINISTRATOR  
CLEARFIELD COUNTY COURTHOUSE  
CLEARFIELD, PA 16830  
(814) 765-2641 x 5982

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

  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff





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

COPY

TCIP Bar, LLC  
Plaintiff(s)

No.: 2006-00873-CD

Real Debt: \$56,473.31

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Virginia A. Flanagan  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: February 13, 2007

Expires: February 13, 2012

Certified from the record this February 13, 2007



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

TCIF.BAR, LLC

vs.

VIRGINIA A. FLANAGAN  
A/K/A.VIRGINIA DILLON

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

No. 06-873-CD Term 2005....

PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)

To the Director of the Office of Judicial Support

Issue writ of execution in the above matter:

Amount Due \$56,473.31

Interest from FEBRUARY 20, 2007 to Sale \$ \_\_\_\_\_  
Per diem \$9.28

Add'l Costs \$ 3,763.31

Prothonotary costs 146.00

*Daniel B. Schmiege*  
Attorney for the Plaintiff(s)

Note: Please attach description of Property.

124141

**FILED** *Atty pd. 20.00*  
*mjb:4062*  
FEB 22 2007 *ice & writs*  
*w/prop descr.*

William A. Shaw  
Prothonotary/Clerk of Courts

*to Sheriff*  
(EK)







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	LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
None	

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

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

TENANT/OCCUPANT	12068 RIDGE ROAD MAHAFFEY, PA 15757
-----------------	--

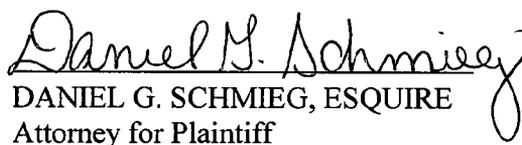
DOMESTIC RELATIONS CLEARFIELD COUNTY	CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830
---	--

COMMONWEALTH OF PENNSYLVANIA	DEPARTMENT OF WELFARE PO BOX 2675 HARRISBURG, PA 17105
---------------------------------	--

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

FEBRUARY 20, 2007

Date

  
DANIEL G. SCHMIEG, ESQUIRE  
Attorney for Plaintiff



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

COPY

TCIE.BAR, LLC

vs.

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

No. .... Term 20

No. 06-873-CD Term 20 05

No. .... Term 20

WRIT OF EXECUTION  
(Mortgage Foreclosure)

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

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

PREMISES: 12068 RIDGE ROAD, MAHAFFEY, PA 15757  
(See Legal Description attached)

Amount Due \$56,473.31

Interest from FEBRUARY 20, 2007 to Sale per diem \$9.28 \$-----

Total \$-----

Add'l Costs \$ 3,763.31

Prothonotary costs 146.00

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

Dated 2/22/07  
(SEAL)

124141

10 25 - 8 11 11 11



**LEGAL DESCRIPTION**

ALL that certain piece or parcel of land situate in the Village of Bethlehem, Township of Bell, County of Clearfield, Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the center of public highway leading from Bethlehem to New Washington and Northwest corner of one-half now or formerly of Bertha Lee;

THENCE through center of Lot No. 2 and along line of this part conveyed to Bertha Lee, South 22.5 degrees West 130 feet;

THENCE North 61 degrees West 105 feet to a post;

THENCE North 22.5 degrees East 130 feet to center of public highway leading from Bethlehem to New Washington;

THENCE along center of said public highway East 61 degrees South 105 feet to the lace of beginning and being known as one-half of Lot No. 2 and all of Lot No. 3 in the J. W. Lee section of the Village of Bethlehem.

SUBJECT to all exceptions, reservations, restrictions and conditions which may appear of record.

**RECORD OWNER**

TITLE TO SAID PREMISES IS VESTED IN Virginia A. Flanagan, married, by Deed from James E. Flanagan and Virginia A. Flanagan, his wife, dated 1-8-04, recorded 2-17-04, in Deed Inst#: 200402345.

Premises being: 12068 RIDGE ROAD  
MAHAFFEY, PA 15757

Tax Parcel No. C12-000-00043



7160 3901 9849 6941 5420

TO: VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

SENDER: TEAM4 LLD

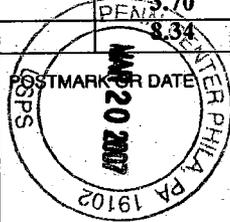
REFERENCE: 124141

PS Form 3800, January 2005

RETURN RECEIPT SERVICE	Postage	.39
	Certified Fee	2.40
	Return Receipt Fee	1.85
	Restricted Delivery	3.70
	Total Postage & Fees	8.34

US Postal Service  
**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail



7160 3901 9849 6941 5413

TO: VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON  
1145 FOX HILL DRIVE, APT. 307  
MONROEVILLE, PA 15146

SENDER: TEAM4 LLD

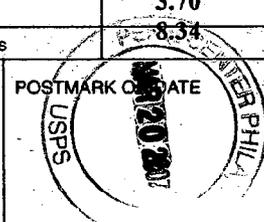
REFERENCE: 124141

PS Form 3800, January 2005

RETURN RECEIPT SERVICE	Postage	.39
	Certified Fee	2.40
	Return Receipt Fee	1.85
	Restricted Delivery	3.70
	Total Postage & Fees	8.34

US Postal Service  
**Receipt for  
Certified Mail**

No Insurance Coverage Provided  
Do Not Use for International Mail



IN THE COURT OF COMMON PLEAS  
CLEARFIELD COUNTY, PENNSYLVANIA

TCIF Bar, LLC

vs.

Virginia A. Flanagan, a/k/a  
Virginia Dillon

CIVIL DIVISION  
NO. 06-873-CD

**ORDER**

AND NOW, this 27<sup>th</sup> day of September, 2006, upon  
consideration of Plaintiff's Motion for Service Pursuant to Special Order of Court, it is hereby  
**ORDERED** and **DECREED** that said Motion is **GRANTED**.

It is further **ORDERED** and **DECREED** that Plaintiff may obtain service of the  
Complaint and all future pleadings on the above captioned Defendant, Virginia A. Flanagan, a/k/a  
Virginia Dillon, by:

1. First class mail to Virginia A. Flanagan, a/k/a Virginia Dillon at the last known  
address, 1145 Fox Hill Drive, Apt. 307, Monroeville, PA 15146 and the  
mortgaged premises located at 12068 Ridge Road, Mahaffey, PA 15757; and
2. Certified mail to Virginia A. Flanagan, a/k/a Virginia Dillon at the last known  
address, 1145 Fox Hill Drive, Apt. 307, Monroeville, PA 15146 and the  
mortgaged premises located at 12068 Ridge Road, Mahaffey, PA 15757.

**BY THE COURT:**

/s/ Fredric J. Ammerman

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

SEP 27 2006

Attest.

*William A. [Signature]*  
Prothonotary/  
Clerk of Courts

FILED

APR 30 2007

12:05 PM

William A. Shaw  
Prothonotary/Clerk of Courts

no c/c

SALE DATE: 5/4/2007

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION – LAW

TCIF BAR, LLC

No.: 06-873-CD

vs.

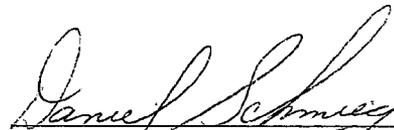
VIRGINIA A. FLANAGAN A/K/A  
VIRGINIA DILLON

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

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

**12068 RIDGE ROAD, MAHAFFEY, PA 15757.**

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

  
DANIEL SCHMIEG, ESQUIRE  
Attorney for Plaintiff

April 26, 2007

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



**Name and  
 Address  
 of Sender**

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postmaster, Per (Name of Receiving Employee)	Total Number of Pieces Received at Post Office	Total Number of Pieces Listed by Sender
1		TENANT/OCCUPANT 12068 RIDGE ROAD MAHAFFEY, PA 15757			
2		DOMESTIC RELATIONS CLEARFIELD COUNTY CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830			
3		COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF WELFARE PO BOX 2675 HARRISBURG, PA 17105			
4		BLOOM ELECTRIC RD 4 BOX 91 CLEARFIELD, PA 16830			
5		UNITED CREDIT CARD BANK, N.A. 8550 UNITED PLAZA BLVD., SUITE 203 BATON ROUGE, LA 70809			
6					
7					
8					
9					
10					
11					
12		<b>Re: VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON</b>			
		<b>TEAM 4/LLD</b>			
				The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional insurance. See Domestic Mail Manual R900, S913 and S921 for limitations of coverage.	

02 1M  
 0004218010  
 MAR 20 2007  
 MAILED FROM ZIP CODE 19103



Fee

**\$ 01.55**

**PHELAN HALLINAN & SCHMIEG**

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard

Suite 1400

Philadelphia, PA 19103-1814

215-563-7000

Main Fax 215-563-3826

[Paul.Boccuti@fedphe.com](mailto:Paul.Boccuti@fedphe.com)

April 26, 2007

**Office of the Prothonotary**

Clearfield County Courthouse

230 East Market Street

Clearfield, PA 16830

**RE: TCIF BAR, LLC  
v. VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON  
NO. 06-873-CD**

**RE: AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129**

Dear Sir/Madam:

Enclosed please find the following:

XX Affidavit of service pursuant to rule 3129 with attachments.

Thank you for your cooperation.

Yours truly,

Michelle Grago

for PHELAN HALLINAN & SCHMIEG

**CC: Sheriff's Office of Clearfield County**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20515  
NO: 06-873-CD

PLAINTIFF: TCIF BAR, LLC  
vs.  
DEFENDANT: VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON  
Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 02/22/2007

LEVY TAKEN 03/06/2007 @ 11:00 AM

POSTED 03/06/2007 @ 11:00 AM

SALE HELD 05/04/2007

SOLD TO TCIF REO GCM, LLC

SOLD FOR AMOUNT \$35,000.00 PLUS COSTS

WRIT RETURNED 05/15/2007

DATE DEED FILED 05/15/2007

PROPERTY ADDRESS 12068 RIDGE ROAD MAHAFFEY , PA 15757

**FILED**  
of 3:50/07  
MAY 15 2007  
William A. Shaw  
Prothonotary/Clerk of Courts

SERVICES

03/15/2007 @ SERVED VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON

SERVED VIRGINIA A. FLANAGAN, DEFENDANT, BY REG. & CERT MAIL PER COURT ORDER TO 1145 FOX HILL DRIVE, APT. 307 MONROEVILLE, PA 15146 FORWARDED TO 303 E. LIBERTY ST. PUNXY, PA 15767 CERT. #70060810000145072353. SIGNED FOR BY JACQUELYN A. FLANAGAN. REG MAIL RETURNED UNCLAIMED 3/19/07.

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

03/07/2007 @ SERVED VIRGINIA A. FLANGAN A/K/A VIRGINIA DILLON

SERVED VIRGINIA A. FLANAGEN, DEFENDANT, BY REG. & CERT MAIL PER COURT ORDER TO 12068 RIDGE ROAD, MAHAFFEY, PA 15757. CERT #70060810000145072797. CERT RETURNED UNCLAIMED MARCH 31, 2007.

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20515  
NO: 06-873-CD

PLAINTIFF: TCIF BAR, LLC  
vs.  
DEFENDANT: VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON  
Execution REAL ESTATE

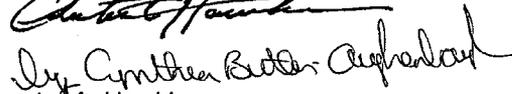
SHERIFF RETURN

---

SHERIFF HAWKINS \$906.02  
SURCHARGE \$20.00 PAID BY ATTORNEY

Sworn to Before Me This  
\_\_\_\_\_ Day of \_\_\_\_\_ 2007  
\_\_\_\_\_

So Answers,

  
  
Chester A. Hawkins  
Sheriff

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

TCIF.BAR, LLC

vs.

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

No. .... Term 20

No. 06-873-CD Term 20 05

No. .... Term 20

WRIT OF EXECUTION  
(Mortgage Foreclosure)

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

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

PREMISES: 12068 RIDGE ROAD, MAHAFFEY, PA 15757  
(See Legal Description attached)

Amount Due	\$56,473.31
Interest from FEBRUARY 20, 2007 to Sale per diem \$9.28	\$-----
Total	\$-----
Add'l Costs	\$ 3,763.31
Prothonotary costs	146.00

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

Dated 2/22/07  
(SEAL)

Received February 22, 2007 @ 2:15 PM  
Chester A. Hankins  
By Cynthia Butler - Aughenbaugh

No. 06-873:CD..... Term 20.05.A.D.

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

TCIF BAR, LLC

vs.

VIRGINIA A. FLANAGAN  
A/K/A VIRGINIA DILLON

WRIT OF EXECUTION  
(Mortgage Foreclosure)

Costs

Real Debt \$56,473.31

Int. from FEBRUARY 20, 2007  
To Date of Sale (\$9.28 per diem)

Costs

Prothy Pd.

146.00

Prothonotary costs

Sheriff

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

Address: VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON  
12068 RIDGE ROAD  
MAHAFFEY, PA 15757

F

**LEGAL DESCRIPTION**

ALL that certain piece or parcel of land situate in the Village of Bethlehem, Township of Bell, County of Clearfield, Commonwealth of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at the center of public highway leading from Bethlehem to New Washington and Northwest corner of one-half now or formerly of Bertha Lee;

THENCE through center of Lot No. 2 and along line of this part conveyed to Bertha Lee, South 22.5 degrees West 130 feet;

THENCE North 61 degrees West 105 feet to a post;

THENCE North 22.5 degrees East 130 feet to center of public highway leading from Bethlehem to New Washington;

THENCE along center of said public highway East 61 degrees South 105 feet to the lace of beginning and being known as one-half of Lot No. 2 and all of Lot No. 3 in the J. W. Lee section of the Village of Bethlehem.

SUBJECT to all exceptions, reservations, restrictions and conditions which may appear of record.

**RECORD OWNER**

TITLE TO SAID PREMISES IS VESTED IN Virginia A. Flanagan, married, by Deed from James E. Flanagan and Virginia A. Flanagan, his wife, dated 1-8-04, recorded 2-17-04, in Deed Inst#: 200402345.

Premises being: 12068 RIDGE ROAD  
MAHAFFEY, PA 15757

Tax Parcel No. C12-000-00043

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME VIRGINIA A. FLANAGAN A/K/A VIRGINIA DILLON

NO. 06-873-CD

VOW, May 15, 2007, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on May 04, 2007, I exposed the within described real estate of Virginia A. Flanagan A/K/A Virginia Dillon to public venue or outcry at which time and place I sold the same to TCIF REO GCM, LLC he/she being the highest bidder, for the sum of \$35,000.00 plus costs and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	15.00
SERVICE	15.00
MILEAGE	
LEVY	15.00
MILEAGE	21.34
POSTING	15.00
CSDS	10.00
COMMISSION	700.00
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	35,000.00
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	
<b>TOTAL SHERIFF COSTS</b>	<b>\$906.02</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	56,473.31
INTEREST @ 9.2800 %	677.44
FROM 02/20/2007 TO 05/04/2007	

PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	20.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	3,763.31
<b>TOTAL DEBT AND INTEREST</b>	<b>\$60,934.06</b>

**COSTS:**

ADVERTISING	350.98
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	29.00
SHERIFF COSTS	906.02
LEGAL JOURNAL COSTS	180.00
PROTHONOTARY	146.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
<b>TOTAL COSTS</b>	<b>\$1,757.00</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

IN THE COURT OF COMMON PLEAS  
CLEARFIELD COUNTY, PENNSYLVANIA

TCIF Bar, LLC

vs.

Virginia A. Flanagan, a/k/a  
Virginia Dillon

CIVIL DIVISION  
NO. 06-873-CD

ORDER

AND NOW, this 27<sup>th</sup> day of September, 2006, upon  
consideration of Plaintiff's Motion for Service Pursuant to Special Order of Court, it is hereby  
**ORDERED** and **DECREED** that said Motion is **GRANTED**.

It is further **ORDERED** and **DECREED** that Plaintiff may obtain service of the  
Complaint and all future pleadings on the above captioned Defendant, Virginia A. Flanagan, a/k/a  
Virginia Dillon, by:

1. First class mail to Virginia A. Flanagan, a/k/a Virginia Dillon at the last known  
address, 1145 Fox Hill Drive, Apt. 307, Monroeville, PA 15146 and the  
mortgaged premises located at 12068 Ridge Road, Mahaffey, PA 15757; and
2. Certified mail to Virginia A. Flanagan, a/k/a Virginia Dillon at the last known  
address, 1145 Fox Hill Drive, Apt. 307, Monroeville, PA 15146 and the  
mortgaged premises located at 12068 Ridge Road, Mahaffey, PA 15757.

BY THE COURT:

/s/ Fredric J. Ammerman

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

SEP 27 2006

Attest.

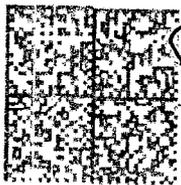
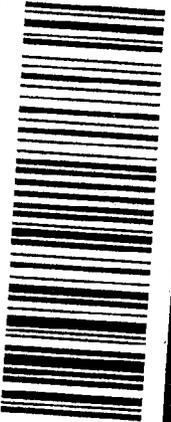
*William A. [Signature]*  
Prothonotary/  
Clerk of Courts



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

**UNCLAIMED**

7006 081D 0001 4507 2797



Hostler  
 016H16505405  
**\$04.830**  
 03/07/2007  
 Mailed From 16830  
 US POSTAGE

VIRGINIA A. FLANAGAN  
 12068 RIDGE ROAD  
 MAHAFFEY, PA 15757

MAILED  
 3-17  
 3-27-07

MAR 12 2007

1456330247201

NIXIE 165 1 25 03/29/07  
 RETURN TO SENDER  
 UNCLAIMED  
 UNABLE TO FORWARD  
 BC: 16830247201 \*0596-09667-09-28

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

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

VIRGINIA A. FLANAGAN AKKA VIRGINIA DILLON  
 12068 RIDGE ROAD  
 MAHAFFEY, PA 15757

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  X  
 Agent

B. Received by (Printed Name)  Addressee

C. Date of Delivery

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

303 E. Liberty St.  
 Punxsutawney, Pa. 15767



2. Article Number  
 (Transfer from service label)

PS Form 3811, February 2004

Domestic Return Receipt

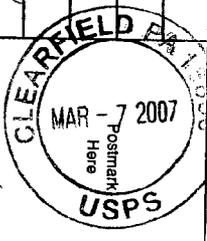
7006 0810 0001 4507 2797

102595-02-M-1540

**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)

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.88



Sent To  
 VIRGINIA A. FLANAGAN AKKA VIRGINIA DILLON  
 Street Apt. No. 12068 RIDGE ROAD  
 or PO Box No. MAHAFFEY, PA 15757  
 City, State, ZIP

7006 0810 0001 4507 2797



CHESTER A. HAWKINS  
SHERIFF

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

VIRGINIA A. FLANAGAN A/K/A VIRGINIA  
DILLON  
1145 FOX HILL DRIVE, APT. 307  
MONROEVILLE, PA 15146

NIXIE 152 1

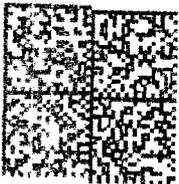
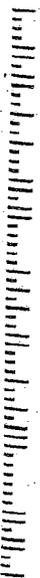
25 03/16/07

RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

BC: 16830247201

\*1843-04295-07-39

15146+1640-2204543992



Postmeter

016H16505405

\$00.630

Mailed From 16830  
03/07/2007

US POSTAGE

**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:  
 VIRGINIA A. FLANAGAN AKKA VIRGINIA DILLON  
 1145 FOX HILL DRIVE, APT. 307  
 MONROEVILLE, PA 15146

MAR 15 2007  
 MAR 15 2007

**COMPLETE THIS SECTION ON DELIVERY**

- A. Signature  Agent  
 Received by (Printed Name)  Addressee  
 B. Received by (Printed Name)  Date of Delivery

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

303 E Liberty St  
 Punxsy PA 15767

3. Service Type  Express Mail  
 Certified Mail  Return Receipt for Merchandise  
 Registered  C.O.D.  
 Insured Mail  Yes

7006 0010 0001 4507 2353

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

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

**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
1 <sup>st</sup> Class Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 4.88



Sent To: VIRGINIA A. FLANAGAN AKKA VIRGINIA DILLON  
 Street, Apt. No.: 1145 FOX HILL DRIVE, APT. 307  
 or PO Box No.: MONROEVILLE, PA 15146  
 City, State, ZIP+4:

PS Form 3800, June 2002 See Reverse for Instructions

7006 0010 0001 4507 2353