

**ABN Amro Mortgage vs Susan Bloom  
2006-1044-CD**

**06-1044-CD  
ABN Amro Mortg. Vs Susan M. Bloom**

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

137146

ABN AMRO MORTGAGE GROUP, INC.  
7159 CORKLAN DRIVE  
JACKSONVILLE, FL 32258-4455

Plaintiff

v.

SUSAN M. BLOOM  
1613 ROBINSON AVENUE  
HYDE, PA 16843

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.

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 5982

Aug 11, 2006 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

William A. Shaw  
Deputy Prothonotary

File #: 137146

Aug 29, 2006 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

William A. Shaw  
Deputy Prothonotary

**FILED** rec Shff  
JUN 30 2006  
11:29 AM  
William A. Shaw  
Prothonotary/Clerk of Courts

**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

ABN AMRO MORTGAGE GROUP, INC.  
7159 CORKLAN DRIVE  
JACKSONVILLE, FL 32258-4455

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

SUSAN M. BLOOM  
1613 ROBINSON AVENUE  
HYDE, PA 16843

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

3. On 07/24/2002 GERALD C. & SUSAN M. BLOOM made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No: 200212612.
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 03/01/2006 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.

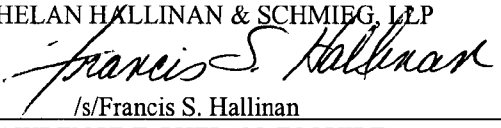
6. The following amounts are due on the mortgage:

|  |                     |
|--|---------------------|
| Principal Balance                                  | \$27,210.44         |
| Interest   | 736.06              |
| 02/01/2006 through 06/29/2006<br>(Per Diem \$4.94) |                     |
| Attorney's Fees                                    | 1,250.00            |
| Cumulative Late Charges                            | 39.60               |
| 07/24/2002 to 06/29/2006                           |                     |
| Cost of Suit and Title Search                      | <u>\$ 550.00</u>    |
| Subtotal   | \$ 29,786.10        |
| Escrow   |                     |
| Credit   | 0.00                |
| Deficit  | 0.00                |
| Subtotal   | <u>\$ 0.00</u>      |
| <b>TOTAL</b>                                       | <b>\$ 29,786.10</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.
9. Plaintiff hereby releases GERALD C. BLOOM, from liability for the debt secured by the mortgage.
10. By virtue of the death of GERALD C. BLOOM on 09/17/2003, Defendant SUSAN M. BLOOM became sole owner of the mortgaged premises as surviving tenant by the entireties .

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$ 29,786.10, together with interest from 06/29/2006 at the rate of \$4.94 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, parcel or tract of land, situate in Lawrence Township, Clearfield County, Pennsylvania, being bounded and described as follows:

BEGINNING at an iron pin on the northwesterly side of Robinson Street at the dividing line between Lots 4 and 5 in Block 17 in the plan of the Steel and Iron Works Addition to Clearfield, Pennsylvania; thence along the dividing line between Lots 4 and 5 in the said plan, North Fifty-three (53) degrees thirty (30) minutes West, One hundred twenty (120) feet to an iron pin on a twenty (20) foot alley; thence along said alley; North thirty-six (36) degrees thirty (30) minutes East, forty (40) feet to an iron pin at the dividing line between Lots 5 and 6 in said plan; thence along the dividing line between Lots 5 and 6 in said plan; South fifty-three (53) degrees thirty (30) minutes East, one hundred twenty (120) feet to an iron pin on the northwesterly side of Robinson Street; thence along the northwesterly side of Robinson Street, South thirty-six (36) degrees thirty (30) minutes West, forty (40) feet to place of beginning.

AND being Lot No. 5 in Block 17 in the plan of the Steel and Iron Works Addition to Clearfield, Pennsylvania.

BEING the same premises granted and conveyed to Clearfield Bank & Trust Company by deed of Chester A. Hawkins, Sheriff of Clearfield County, dated August 4, 1989 and recorded in the office of the Recorder of Deeds of Clearfield County on August 7, 1989 in Deed and Records Book Volume 1295, page 544.

PROPERTY BEING: 1613 ROBINSON AVENUE

**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 .

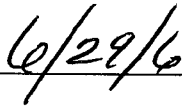
The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.



---

FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

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



# In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **101679**

ABN AMRO MORTGAGE GROUP, INC.

Case # 06-1044-CD

vs.

SUSAN M. BLOOM

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

## SHERIFF RETURNS

NOW August 03, 2006 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO SUSAN M. BLOOM, DEFENDANT. SEVERAL ATTEMPTS, NOT HOME.

SERVED BY: /

### Return Costs

| PURPOSE         | VENDOR | CHECK # | AMOUNT |
|-----------------|--------|---------|--------|
| SURCHARGE       | PHELAN | 514705  | 10.00  |
| SHERIFF HAWKINS | PHELAN | 514705  | 28.24  |

# FILED

AUG 03 2006

012:101 (5)

William A. Shaw

Prothonotary/Clerk of Courts

Sworn to Before me This

So Answers,

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



Chester A. Hawkins  
Sheriff



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

137146

ABN AMRO MORTGAGE GROUP, INC.  
7159 CORKLAN DRIVE  
JACKSONVILLE, FL 32258-4455

Plaintiff

v.

SUSAN M. BLOOM  
1613 ROBINSON AVENUE  
HYDE, PA 16843

Defendant

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**COMPLAINT IN MORTGAGE FORECLOSURE**

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Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. *06-1044-CD*  
CLEARFIELD COUNTY

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

JUN 30 2006

Attest.

*William L. Shaw*  
Prothonotary/  
Clerk of Courts

*Original filed for record*

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JACKSONVILLE, FL 32258-4455

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SUSAN M. BLOOM  
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PHELAN HALLINAN & SCHMIEG, LLP

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

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PROPERTY BEING: 1613 ROBINSON AVENUE

**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 .

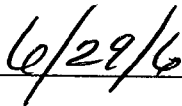
The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.



---

FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

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



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

ABN AMRO MORTGAGE GROUP, INC.

Plaintiff

vs.

SUSAN M. BLOOM

Defendants

: COURT OF COMMON PLEAS

:

: CIVIL DIVISION

:

: CLEARFIELD County

:

: No. 06-1044-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 Hallinan

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

Date: August 10, 2006

/lcf, Svc Dept.  
File# 137146

**FILED** *Atty pd. 7.00*  
*m 12:09/54*  
**AUG 11 2006** *1 Compl. to*  
*Atty Reinstated*  
William A. Shaw  
Prothonotary/Clerk of Courts *16 CC*  
*(32)*

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

FILED <sup>NO CC</sup>  
m 11:31 AM  
AUG 11 2006 <sup>CA</sup>

William A. Shaw  
Prothonotary/Clerk of Courts

Attorney for Plaintiff

ABN AMRO Mortgage Group,  
Inc.

COURT OF COMMON PLEAS

vs.

CIVIL DIVISION

Susan M. Bloom

CLEARFIELD COUNTY

NO. 06-1044-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, Susan M. Bloom, by first class mail and certified mail to the last known addresses, 13046 Bassford Drive, Houston, TX 77099, P.O. Box 307, Hyde PA 16843 and the mortgaged premises, 1613 Robinson Avenue, Hyde, PA 16843, and in support thereof avers the following:

1. Attempts to serve Defendant, Susan M. Bloom and , with the Complaint have been unsuccessful. The Sheriff of Clearfield County attempted to serve the Defendant at the mortgaged premises, 1613 Robinson Avenue, Hyde, PA 16843. As indicated by the Sheriff's Return of Service attached hereto as Exhibit "A", no service was made as the defendant was not found.

2. Plaintiff attempted to serve the Defendant at the last known address, 13046 Bassford Drive, Houston, TX 77099. As indicated by the Return of Service attached hereto as Exhibit "B", no service was made as the defendant no longer resides at this address.

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 "C".

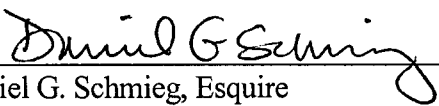


4. Plaintiff has reviewed its internal records and has not been contacted by the Defendant as of August 10, 2006 to bring loan current.

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: August 10, 2006



# In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **101679**

ABN AMRO MORTGAGE GROUP, INC.

Case # 06-1044-CD

vs.

SUSAN M. BLOOM

COPY

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

## SHERIFF RETURNS

NOW August 03, 2006 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO SUSAN M. BLOOM, DEFENDANT. SEVERAL ATTEMPTS, NOT HOME.

SERVED BY: /

### Return Costs

| PURPOSE         | VENDOR | CHECK # | AMOUNT |
|-----------------|--------|---------|--------|
| SURCHARGE       | PHELAN | 514705  | 10.00  |
| SHERIFF HAWKINS | PHELAN | 514705  | 28.24  |

Sworn to Before me This

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

\_\_\_\_\_

So Answers,



Chester A. Hawkins  
Sheriff



**AFFIDAVIT OF SERVICE – CLEARFIELD COUNTY(LCF)**

ABN AMRO MORTGAGE GROUP, INC.

Plaintiff

Vs.

SUSAN M. BLOOM

Defendant

**TYPE OF ACTION**

**XX Mortgage Foreclosure**

**XX Civil Action**

**NO. 06-1044-CD**

**File Number 137146**

SERVE AT: **13046 BASSFORD DRIVE  
HOUSTON, TX 77099**

**SERVED**

Served and made known to SUSAN M. BLOOM Defendant on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock, \_\_. M., at \_\_\_\_\_, City in the manner described below:

- \_\_\_\_ Defendant personally served.  
\_\_\_\_ Adult family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.  
\_\_\_\_ Adult in charge of Defendant's residence who refused to give name/relationship.  
\_\_\_\_ Manager/Clerk of place of lodging in which Defendant(s) reside(s)  
\_\_\_\_ Agent or person in charge of Defendant's office or usual place of business.  
\_\_\_\_ and officer of said defendant company.  
\_\_\_\_ Other: \_\_\_\_\_.

I, \_\_\_\_\_, a competent adult, being duly sworn according to law, depose and state that I personally handed to \_\_\_\_\_ a true and correct copy of the \_\_\_\_\_ issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed

Before me this \_\_\_\_\_ day

Of \_\_\_\_\_, 20\_\_\_\_.

Notary:

**Served By:** \_\_\_\_\_

On the 21<sup>st</sup> day of July, 2006 at 8:15 AM o'clock

A.M., Defendant NOT FOUND because

X Moved \_\_\_\_\_ Unknown \_\_\_\_\_ No Answer \_\_\_\_\_ Vacant

Other: \_\_\_\_\_

Sworn to and subscribed

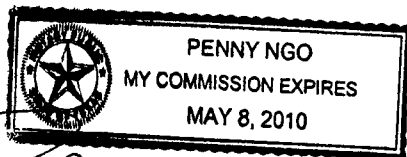
Before me the 27<sup>th</sup> day

Of July, 2006

Notary:

**Not Served By:** \_\_\_\_\_

LL Nick Hgo



**Phelan Hallinan & Schmieg, LLP**

Attorneys For Plaintiff

Francis S. Hallinan, Esquire – I.D.#62695

Suite 1400- One Penn Center Plaza at Suburban Station

Philadelphia, PA 19103-1799

(215)563-7000



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

File Number: 137146

Attorney Firm: **Phelan, Hallinan & Schmieg, LLP**

Subject: Gerald Bloom (Dec'd) & Susan Bloom

Property Address: 1613 Robinson Avenue, Hyde, PA 16843

Possible Additional Mailing: 13046 Bassford Drive, Houston, TX 77099

**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

Susan Bloom - Not Available

**B. EMPLOYMENT SEARCH**

Susan Bloom - A review of the credit reporting agencies provided no employment information.

**C. INQUIRY OF CREDITORS**

Our inquiry of creditors indicated that Susan Bloom reside(s) at: 1613 Robinson Avenue, Hyde, PA 16843.

**II. INQUIRY OF TELEPHONE COMPANY**

**A. DIRECTORY ASSISTANCE SEARCH**

Our office contacted directory assistance, which indicated that Susan Bloom reside(s) at: PO Box 307, Hyde, PA 16843. On 08-04-06 our office made several telephone calls to the subject's phone number, (814) 765-4467 and received the following information: phone disconnected.

**III. INQUIRY OF NEIGHBORS**

Using both our White Pages data base and our National Address data base our office was unable to locate any neighbors within ten houses of 1613 Robinson Avenue, Hyde, PA 16843.

On 08-04-06 our office attempted to contact Terry L. Chesser, at 13047 Bassford Drive, Houston, TX 77099, (281) 498-6134 and received the following information: spoke with an unidentified female who could not confirm or deny that the subject resides at 13046 Bassford Drive, Houston, TX 77099.

On 08-04-06 our office made several phone calls in an attempt to contact Melvin Earl Bradford, at 13048 Bassford Drive, Houston, TX 77099, (281) 530-0998 and received the following information: answering machine.

IV. ADDRESS INQUIRY

A. NATIONAL ADDRESS UPDATE

On 08-04-06 we reviewed the National Address database and found the following information: Susan Bloom- 13046 Bassford Drive, Houston, TX 77099.

B. ADDITIONAL ACTIVE MAILING ADDRESSES

Per our inquiry of creditors, the following is a possible mailing address: 13046 Bassford Drive, Houston, TX 77099.

V. DRIVERS LICENSE INFORMATION

A. MOTOR VEHICLE & DMV OFFICE

Per the PA Department of Motor Vehicles, we were unable to obtain address information on Susan Bloom.

VI. OTHER INQUIRIES

A. DEATH RECORDS

As of 08-04-06 Vital Records and all public databases have a death record on file for Gerald Bloom (Dec'd) & no death record on file for Susan Bloom.

B. COUNTY VOTER REGISTRATION

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

VII. ADDITIONAL INFORMATION OF SUBJECT

A. DATE OF BIRTH

Susan Bloom - 05-31-1948

B. A.K.A.

Susan Bloom, Susan M. Bloom

**\* 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.

Brendan Booth

AFFIANT - Brendan Booth  
Full Spectrum Legal Services, Inc.

Sworn to and subscribed before me this 4<sup>th</sup> day of August 2006.

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL  
THOMAS P. STRAIN, Notary Public  
City of Philadelphia, Phila. County  
Commission Expires February 4, 2010

Thomas P. Strain

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

kls

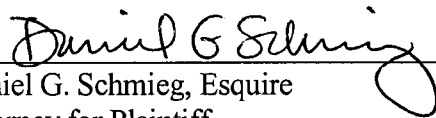


## VERIFICATION

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: August 10, 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

ABN AMRO Mortgage Group,  
Inc.

COURT OF COMMON PLEAS

Vs.

CIVIL DIVISION

Susan M. Bloom

CLEARFIELD COUNTY

NO. 06-1044-CD

### CERTIFICATION OF SERVICE

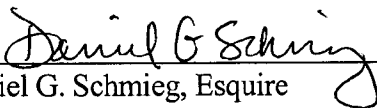
I, Daniel G. Schmieg, Esquire, hereby certify that a copy of the foregoing Motion for Service Pursuant to Special Order of Court, Memorandum of Law, Proposed Order and attached exhibits have been sent to the individual as indicated below by first class mail, postage prepaid, on the date listed below.

Susan M. Bloom at:

1613 Robinson Avenue, Hyde, PA 16843  
13046 Bassford Drive, Houston, TX 77099  
P.O. Box 307, Hyde PA 16843

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: August 10, 2006

IN THE COURT OF COMMON PLEAS  
CLEARFIELD COUNTY, PENNSYLVANIA

ABN AMRO Mortgage Group,  
Inc.

vs.

Susan M. Bloom

:

:

:

:

:

CIVIL DIVISION  
NO. 06-1044-CD

**ORDER**

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_, 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, Susan M. Bloom, by:

1. First class mail to Susan M. Bloom at the last known addresses, 13046 Bassford Drive, Houston, TX 77099, P.O. Box 307, Hyde PA 16843 and the mortgaged premises located at 1613 Robinson Avenue, Hyde, PA 16843; and
2. Certified mail to Susan M. Bloom at the last known addresses, 13046 Bassford Drive, Houston, TX 77099, P.O. Box 307, Hyde PA 16843 and the mortgaged premises located at 1613 Robinson Avenue, Hyde, PA 16843.

**BY THE COURT:**

---

**J.**

CA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

ABN AMRO MORTGAGE GROUP, INC.,  
Plaintiff

vs.

SUSAN M. BLOOM,  
Defendant

\*  
\*  
\*  
\*  
\*  
\*  
\*

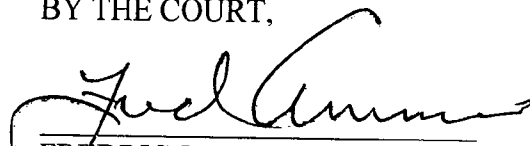
NO. 06-1044-CD

**ORDER**

NOW, this 14th day of August, 2006, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon **Defendant, SUSAN M. BLOOM**, by publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal, by first class mail and by certified mail, return receipt requested, at the Defendant's last known addresses, PO Box 307, Hyde, PA 16843, 13046 Bassford Drive, Houston, TX 77099 and by posting the mortgaged premises known in this herein action as 1613 Robinson Avenue, Hyde, PA 16843.

All further service of legal papers, including but not limited to motions, petitions and rules, shall be made by certified and first class mail to Defendant Susan M. Bloom's last known addresses.

BY THE COURT,

  
FREDRIC J. AMMERMAN  
President Judge

FILED 3cc  
013:41 761 Atty Schmieg  
AUG 16 2006  
CR

William A. Shaw  
Prothonotary/Clerk of Courts

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

ABN AMRO MORTGAGE GROUP, INC.

Plaintiff

vs.

SUSAN M. BLOOM

Defendants

: COURT OF COMMON PLEAS

:

: CIVIL DIVISION

:

: CLEARFIELD County

:

: No. 06-1044-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: August 28, 2006

/lcf, Svc Dept.  
File# 137146

**FILED** Aug pdl 7.00  
m 12:11 PM  
AUG 29 2006 1 Compl. Reinstated  
to Aug & 1 Compl.  
Reinstated to Shff  
@GK  
William A. Shaw  
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG LLP  
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

ABN AMRO MORTGAGE GROUP, INC.  
Plaintiff

: COURT OF COMMON PLEAS

vs.

: CIVIL DIVISION

SUSAN M. BLOOM

Defendant(s)

: CLEARFIELD COUNTY

: NO. 06-1044-CD

**AFFIDAVIT OF SERVICE OF COMPLAINT**  
**BY MAIL PURSUANT TO COURT ORDER**

I hereby certify that a true and correct copy of the Civil Action Complaint in Mortgage Foreclosure in the above captioned matter was sent by regular and certified mail, return receipt requested, to the following person, SUSAN M. BLOOM at **1613 ROBINSON AVENUE, HYDE, PA 16843, PO BOX 307, HYDE, PA 16843 and 13046 BASSFORD DRIVE, HOUSTON, TX 77099** on **AUGUST 28, 2006**, in accordance with the Order of Court dated **AUGUST 14, 2006**.

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

Date: August 28, 2006

  
FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff

FILED  
AUG 30 2006  
2/1:00 PM  
William A.  
Prothonotary/Clerk  
1 SENT TO AFT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101877  
NO: 06-1044-CD  
SERVICE # 1 OF 1  
COMPLAINT IN MORTGAGE FORECLOSURE &

ORDER

PLAINTIFF: ABN AMRO MORTGAGE GROUP, INC.  
vs.  
DEFENDANT: SUSAN M. BLOOM

SHERIFF RETURN

NOW, September 01, 2006 AT 9:28 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE & ORDER ON SUSAN M. BLOOM DEFENDANT AT 1613 ROBINSON AVE., HYDE, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO POSTED ON PROPERTY, A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE & ORDER AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER /

FILED

9:31:41 am  
SEP 05 2006

William A. Shaw  
Prothonotary/Clerk of Courts

| PURPOSE         | VENDOR | CHECK # | AMOUNT |
|-----------------|--------|---------|--------|
| SURCHARGE       | PHELAN | 530149  | 10.00  |
| SHERIFF HAWKINS | PHELAN | 530149  | 12.56  |

Sworn to Before Me This

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

\_\_\_\_\_

So Answers,

*Chester A. Hawkins*  
*Sydney Harris*

Chester A. Hawkins  
Sheriff

Phelan Hallinan & Schmieg, LLP  
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

ABN AMRO MORTGAGE GROUP, INC.

: Court Of Common Pleas

vs.

: Civil Division

SUSAN M. BLOOM

: CLEARFIELD County

: No. 06-1044-CD

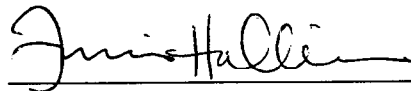
**FILED** *no cc*  
*m/12:48/61*  
**SEP 22 2006**  
*UM*  
William A. Shaw  
Prothonotary/Clerk of Courts

AFFIDAVIT OF SERVICE BY  
PUBLICATION IN ACCORDANCE WITH COURT ORDER

I hereby certify that service of the Civil Action Complaint in Mortgage Foreclosure was made in accordance with the Court Order dated August 14, 2006 as indicated below:

By publication as provided by Pa. R.C.P. Rule 430(b)(1)  
in The Progress on August 31, 2006 and Clearfield County Legal Journal on September 8, 2006.  
Proofs of the said publications are attached hereto.

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

  
Francis S. Hallinan, Esquire

Date: September 19, 2006

Laura Fischer  
Service Dept.



NOTICE OF ACTION  
IN MORTGAGE FORECLOSURE  
IN THE COURT  
OF COMMON PLEAS  
OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
CIVIL ACTION-LAW  
COURT OF  
COMMON PLEAS  
CIVIL DIVISION  
CLEARFIELD COUNTY  
NO. 06-1044-CD

ABN AMRO  
MORTGAGE GROUP, INC.  
Vs.

SUSAN M. BLOOM  
NOTICE

TO SUSAN M. BLOOM:

You are hereby notified that on JUNE 30, 2006, Plaintiff, ABN AMRO MORTGAGE GROUP, INC., filed a Mortgage Foreclosure Complaint endorsed with a Notice to Defend, against you in the Court of Common Pleas of CLEARFIELD County Pennsylvania, docketed to No. 06-1044-CD. Wherein Plaintiff seeks to foreclose on the mortgage secured on your property located at 1613 ROBINSON AVENUE, HYDE, PA 16843 whereupon your property would be sold by the Sheriff of CLEARFIELD County.

You are hereby notified to plead to the above referenced Complaint on or before 20 days from the date of this publication or a Judgment will be entered against you.

NOTICE

If you wish to defend, you must enter a written appearance personally or by attorney and file your defenses or objections in writing with the court. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you without further notice for the relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS NOTICE 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.

CLEARFIELD COUNTY  
DAVID S. MEHOLICK  
COURT ADMINISTRATOR  
CLEARFIELD COUNTY  
COURTHOUSE  
CLEARFIELD, PA 16380  
(814) 765-2641, Ext. 5982

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

8:31-1d-b

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :  
COUNTY OF CLEARFIELD : SS:

On this 7th day of September, A.D. 2006, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Margaret E. Krebs, who being duly sworn according to law, deposes and says that she is the President of The Progressive Publishing Company, Inc., and Associate Publisher of The Progress, a daily newspaper published at Clearfield, in the County of Clearfield and State of Pennsylvania, and established April 5, 1913, and that the annexed is a true copy of a notice or advertisement published in said publication in

the regular issues of August 31, 2006

And that the affiant is not interested in the subject matter of the notice or advertising, and that all of the allegations of this statement as to the time, place, and character of publication are true.

*Margaret E. Krebs*

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

*Cheryl J. Robison*  
Notary Public  
Clearfield, Pa.

My Commission Expires  
October 31, 2007

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Cheryl J. Robison, Notary Public  
Clearfield Boro, Clearfield County  
My Commission Expires Oct. 31, 2007

Member, Pennsylvania Association Of Notaries

**NOTICE OF ACTION IN  
MORTGAGE FORECLOSURE  
IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW**

**ABN AMRO MORTGAGE GROUP, INC.  
Vs. SUSAN M. BLOOM  
COURT OF COMMON PLEAS  
CIVIL DIVISION  
CLEARFIELD COUNTY  
NO. 06-1044-CD  
NOTICE**

**TO SUSAN M. BLOOM:**

You are hereby notified that on JUNE 30, 2006, Plaintiff, ABN AMRO MORTGAGE GROUP, INC., filed a Mortgage Foreclosure Complaint endorsed with a Notice to Defend, against you in the Court of Common Pleas of CLEARFIELD County Pennsylvania, docketed to No. 06-1044-CD. Wherein Plaintiff seeks to foreclose on the mortgage secured on your property located at 1613 ROBINSON AVENUE, HYDE, PA 16843 whereupon your property would be sold by the Sheriff of CLEARFIELD County.

You are hereby notified to plead to the above referenced Complaint on or before 20 days from the date of this publication or a Judgment will be entered against you.

**NOTICE**

If you wish to defend, you must enter a written appearance personally or by attorney and file your defenses or objections in writing with the court. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you without further notice for the relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS NOTICE 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.

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

PROPERTY ADDRESS: 486 E. 8  
STREET, CLEARFIELD, PA 16830.

SEIZED, taken in execution to be sold  
as the property of JAMES P. SCHUCKER,  
at the suit of NATIONAL CITY MORTGAGE  
COMPANY. JUDGMENT NO. 05-2021-CD.

Chester A. Hawkins, Sheriff.

ADV: September 8th, 15th, 22nd, 2006.

Chester A. Hawkins, Sheriff.

ADV: September 8th, 15th, 22nd, 2006.

---

**SHERIFF'S SALE  
OF VALUABLE REAL ESTATE**

BY VIRTUE OF: Execution issued out of  
the Court of Common Pleas of Clearfield  
County, Pennsylvania and to me directed,  
there will be exposed to public sale in the  
Sheriff's Office in the Court House in the  
Borough of Clearfield on FRIDAY,  
OCTOBER 6, 2006 at 10:00 A.M.

THE FOLLOWING DESCRIBED  
PROPERTY TO WIT: (SEE ATTACHED  
DESCRIPTION) TERMS OF SALE

The Price of sum at which the property  
shall be struck off must be paid at the time  
of sale or such other arrangements made as  
will be approved, otherwise the property will  
be immediately put up and sold again at the  
expense and risk of the person to whom it  
was struck off and who in case of deficiency  
of such resale shall make good for the same  
and in no instance will the deed be  
presented for confirmation unless the money  
is actually paid to the Sheriff.

TO all parties in interest and claimants:  
A schedule of distribution will be filed by the  
Sheriff in his office the first Monday following  
the date of the sale and distribution will be  
made in accordance with the schedule  
unless exceptions are filed within ten (10)  
days thereafter.

ALL THAT CERTAIN TRACT OF LAND  
DESIGNATED AS LOT NO. 210 IN  
SECTION 8, IN THE TREASURE LAKE  
SUBDIVISION IN SANDY TOWNSHIP,  
CLEARFIELD COUNTY, PENNSYLVANIA,  
RECORDED IN THE RECORDER OF  
DEEDS OFFICE IN MISC. DOCKET MAP  
FILE NO. 25.

EXCEPTING AND RESERVING  
THEREFROM AND SUBJECT TO:

RECORD OWNER

TITLE TO SAID PREMISES IS  
VESTED IN Jerry A. Miles, Jr. by Deed from  
Lloyd W. Light and Judith F. Light, husband  
and wife, dated 7-27-01 and recorded 8-31-  
01 in Deed Book 1908, Page 213.

LLOYD W. LIGHT AND JUDITH F.  
LIGHT, HUSBAND AND WIFE, BY DEED  
FROM JEFFREY W. RICE AND BRENDA L.  
RICE, HUSBAND AND WIFE DATED  
01/06/98 Instrument #200113860. Lloyd W.

Premises being 333 TREASURE LAKE,  
DUBOIS, PA 15801.


Tax Parcel No. C02-008-00210-0021

SEIZED, taken in execution to be sold  
as the property of LLOYD LIGHT A/K/A  
LLOYD W. LIGHT AND JUDITH LIGHT,

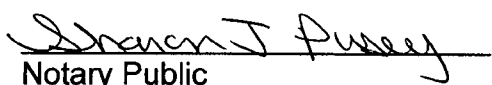
## PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :  
:  
COUNTY OF CLEARFIELD :

On this 8th day of September AD 2006, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement published in said publication in the regular issues of Week of September 8, 2006, Vol. 18 No. 36. And that all of the allegations of this statement as to the time, place, and character of the publication are true.

  
\_\_\_\_\_  
Gary A. Knaresboro, Esquire  
Editor

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

  
\_\_\_\_\_  
Notary Public  
My Commission Expires

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

Full Spectrum Legal Services