

06-1571-CD

The CIT Group vs John Suhoney Jr al

2006-1571-CD

CIT Group vs John Suhoney et al

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

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

v.
John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irvona, PA 16656
Defendant(s)

NO. 06-1571-CD

COMPLAINT IN MORTGAGE FORECLOSURE

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

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

LAWYERS REFERRAL SERVICE

David S. Meholic
Court Administrator

Jaw. 18, 2007 Document Clearfield County Courthouse
Reinstated/Reissued to Sheriff/Attorney Clearfield, PA 16830
for service. Allen 814-765-2641 x 5982

Deputy Prothonotary

Atty pd. \$5.00
M 12:53:04
SEP 27 2007 2CC Shff
FILED

William A. Shaw
Prothonotary/Clerk of Courts

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentear una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

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

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: N/a

Assignments of Record to: N/a

Recording Date: N/a

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: RR1 Box 141

MUNICIPALITY/TOWNSHIP/BOROUGH: Chest Township

COUNTY: Clearfield

DATE EXECUTED: 1/12/01

DATE RECORDED: 1/24/01 INSTRUMENT #: 200100946

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

(a) by failing or refusing to pay the installments of

principal and interest when due in the amounts indicated below;

(b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 8/11/06:

Principal of debt due	\$42,848.97
Unpaid Interest at 11.99002% from 5/1/05 to 8/11/06 (the per diem interest accruing on this debt is \$28.16 and that sum should be added each day after 8/11/06)	11,708.18
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Escrow Overdraft/(Balance) (The monthly escrow on this account is \$0 and that sum should be added on the first of each month after 8/11/06)	
Recoverable Balance	683.38
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,142.45</u>
TOTAL	\$57,987.98

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time

limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$57,987.98 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



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

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

BEGINNING at an iron pin (found) at the Southeastern Right-of-Way of Township Road No. T-417 having a 33 foot wide Roadway and at corner of former grantor; thence by name South 29 degrees 43 minutes 40 seconds East a distance of 116.13 feet to an iron pipe (found); thence South 34 degrees 54 minutes 23 seconds West a distance of 200.49 feet to an iron pipe (found); thence North 66 degrees 49 minutes 46 seconds West a distance of 226.22 feet to an iron pipe (set) on the Southeastern Right-of-Way of Township Road No. T-417; thence by said Right-of-Way North 54 degrees 58 minutes 08 seconds East a distance of 245.23 feet to a point within the said Township Road; thence along said Township Road North 61 degrees 06 minutes 28 seconds East a distance of 73.45 feet to an iron pin, the place of beginning. Containing 0.95522 acres by calculation and more particularly shown on plan of Survey by Fred H. Shuss, P.E., dated December 7, 1994 and attached to prior deed of record.

SUBJECT, HOWEVER, to all restrictions, exceptions, reservations, easements and conditions as contained in prior deeds of conveyance.

Property known as: RR 1 Box 141, Irvona, PA 16656 a/k/a 624 Frailey Road.

Tax ID #: 109-G16-000-00029 (Control #1090-51344)

ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

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

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

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

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

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

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

EXHIBIT A

HOMEOWNER'S NAME(S):	John C. Suhoney Jr. Robin L. Suhoney
PROPERTY ADDRESS:	RR 1 Box 141 Irvona PA 16656
LOAN ACCT. NO.:	009191796219
ORIGINAL LENDER:	The CIT Group/Consumer Finance Inc
CURRENT LENDER:	The CIT Group/Consumer Finance Inc

HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM

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

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

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.

TEMPORARY STAY OF FORECLOSURE -- Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the consumer credit counseling agencies listed at the end of this Notice. **THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE.** THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT", EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.

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

APPLICATION FOR MORTGAGE ASSISTANCE -- Your mortgage is in default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your

face- to-face meeting.

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

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

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

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

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

NATURE OF THE DEFAULT -- The MORTGAGE debt held by the above lender on your property located at:

**RR 1 Box 141
Irvona PA 16656**

IS SERIOUSLY IN DEFAULT because:

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

Monthly Payments of \$477.23 for June 1, 2005 thru August 1, 2006 = \$7158.45

Monthly Late Charges of \$0 for June 1, 2005 thru August 1, 2006 = \$0.00

Other charges (explain/itemize): _____

TOTAL AMOUNT PAST DUE: \$7158.45

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable): **N/A**

HOW TO CURE THE DEFAULT -- You may cure the default within THIRTY (30) DAYS of the date of this notice BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS **\$7158.45** PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:

**Udren Law Offices, P.C.
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620**

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.): **N/A**

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

IF THE MORTGAGE IS FORECLOSED UPON -- The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

OTHER LENDER REMEDIES -- The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage. If your debt has been discharged in bankruptcy without your having reaffirmed it, then lender cannot pursue this remedy.

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

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

HOW TO CONTACT THE LENDER:

Name of Lender/Servicer:

Address:

Phone Number:

Fax Number:

Contact Person:

CIT

715 South Metropolis Avenue Suite 150

Oklahoma City OK 73108

(800) 621-1437

(405) 553-4790

Customer Service

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

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

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

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

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400

YOU MAY ALSO HAVE THE RIGHT:

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

CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY

CLEARFIELD COUNTY

Keystone Economic Development Corporation
1954 Mary Grace Lane
Johnstown, PA 15901
(814) 535-6556
FAX (814) 539-1688

CCCS of Western Pennsylvania, Inc.
217 E. Plank Road
Altoona PA 16602
(814) 944-8100
FAX (814) 944-5747

CCCS of Western PA
219-A College Park Plaza
Johnstown PA 15904
(814) 539-6335
FAX n/a

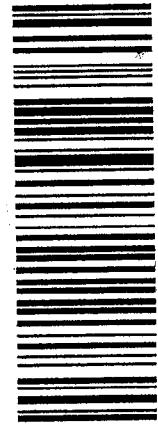
Indiana Co. Community Action Program
827 Water Street, Box 187
Indiana, PA 15701
(724) 465-2657
FAX (412) 465-5118

CCCS of Northeastern PA
1631 S Atherton St., Suite 100
State College, PA 16801
(814) 238-3668
FAX (814) 238-3669

Successor Defendants

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

Robin L. Suhoney
RR1 Box 141
Irvona PA 16656



U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com ®	
OFFICIAL USE	
Postage	\$ 03
Certified Fee	240
Return Receipt Fee (Endorsement Required)	175
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 448

Postmark
Here

*Robin L. Suhoney
RR1 Box 141
Irvona PA 16656*

PS Form 3800, June 2000

See Reverse for Instructions

COMPLETE THIS SECTION ON DELIVERY		
<p>SENDER: COMPLETE THIS SECTION</p> <ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		
<p>1. Article Addressed to:</p> <p>RONALD L. SENCER RR 2 Box 1011 IRVING, TEXAS 75062</p>		
<p>2. Article Number <i>(Transfer from service label)</i></p> <p>7006 0100 0005 3898 2375</p>		
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		
<p>4. Restricted Delivery? (Extra Fee)</p> <p><input type="checkbox"/> Yes</p>		
<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>		
<p>B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery</p>		
<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>		

30080334 Referrals

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

John C. Suhoney Jr.
RR1 Box 141
Irving PA 16656



SENDER: COMPLETE THIS SECTION

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

COMPLETE THIS SECTION ON DELIVERY

COMPLETE THIS SECTION ON DELIVERY	
<p>A. Signature</p> <p>X</p>	
B. Received by (Printed Name)	C. Date of Delivery
<p>D. Is delivery address different from item 1?</p> <p>If YES, enter delivery address below:</p> <p>.....</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>4. Restricted Delivery? (Extra Fee)</p> <p><input type="checkbox"/> Yes</p>	

Certified Mail Provides:

2. Article Number
(Transfer from service label) 7006 0100 0005 3898 2382
PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

V E R I F I C A T I O N

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation unless designated otherwise; that he is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.



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

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 2 Services

Sheriff Docket # **101962**

THE CIT GROUP/CONSUMER FINANCE INC.

Case # **06-1571-CD**

vs.

JOHN CALVIN SUHONEY JR. and ROBIN LYNN SUHONEY

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW January 09, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO JOHN CALVIN SUHONEY JR., DEFENDANT. RR#1 BOX 141 (CHEST TWP) IRVONA, PA "EMPTY".

SERVED BY: /

FILED
02/33/07
JAN 09 2007
WAS
William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 2 of 2 Services

Sheriff Docket # **101962**

THE CIT GROUP/CONSUMER FINANCE INC.

Case # 06-1571-CD

vs.

JOHN CALVIN SUHONEY JR. and ROBIN LYNN SUHONEY

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW January 09, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO ROBIN LYNN SUHONEY, DEFENDANT. RR#1 BOX 141 (CHEST TWP) IRVONA, PA. "EMPTY".

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 101962
NO: 06-1571-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE INC.
vs.
DEFENDANT: JOHN CALVIN SUHONEY JR. and ROBIN LYNN SUHONEY

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	71293	20.00
SHERIFF HAWKINS	UDREN	71293	43.03

Sworn to Before Me This

So Answers,

____ Day of _____ 2007

✓ Chester A. Hawkins
Sheriff

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

The CIT Group/Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irvona, PA 16656
Defendant(s)

ATTORNEY FOR PLAINTIFF

WE HEREBY CERTIFY THE
WITHIN 10 DAYS BY A TRUE AND
CORRECT COPY OF THE ORIGINAL

COURT OF COMMON PLEAS
CIVIL DIVISION ^{hereby certify this to be a true}
and attested copy of the original
statement filed in this case.
Clearfield County

SEP 27 2006

Heist.
NO. 06-1571-CD

William J. Heist
Prothonotary/
Clerk of Courts

COMPLAINT IN MORTGAGE FORECLOSURE

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

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

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

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentear una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiene, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641 x 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do not notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

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

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: N/a

Assignments of Record to: N/a

Recording Date: N/a

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: RR1 Box 141

MUNICIPALITY/TOWNSHIP/BOROUGH: Chest Township

COUNTY: Clearfield

DATE EXECUTED: 1/12/01

DATE RECORDED: 1/24/01 INSTRUMENT #: 200100946

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

(a) by failing or refusing to pay the installments of

principal and interest when due in the amounts indicated below;

(b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 8/11/06:

Principal of debt due	\$42,848.97
Unpaid Interest at 11.99002% from 5/1/05 to 8/11/06 (the per diem interest accruing on this debt is \$28.16 and that sum should be added each day after 8/11/06)	11,708.18
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Escrow Overdraft/ (Balance) (The monthly escrow on this account is \$0 and that sum should be added on the first of each month after 8/11/06)	
Recoverable Balance	683.38
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,142.45</u>
TOTAL	\$57,987.98

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time

limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$57,987.98 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



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

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

BEGINNING at an iron pin (found) at the Southeastern Right-of-Way of Township Road No. T-417 having a 33 foot wide Roadway and at corner of former grantor; thence by name South 29 degrees 43 minutes 40 seconds East a distance of 116.13 feet to an iron pipe (found); thence South 34 degrees 54 minutes 23 seconds West a distance of 200.49 feet to an iron pipe (found); thence North 66 degrees 49 minutes 46 seconds West a distance of 226.22 feet to an iron pipe (set) on the Southeastern Right-of-Way of Township Road No. T-417; thence by said Right-of-Way North 54 degrees 58 minutes 08 seconds East a distance of 245.23 feet to a point within the said Township Road; thence along said Township Road North 61 degrees 06 minutes 28 seconds East a distance of 73.45 feet to an iron pin, the place of beginning. Containing 0.95522 acres by calculation and more particularly shown on plan of Survey by Fred H. Shuss, P.E., dated December 7, 1994 and attached to prior deed of record.

SUBJECT, HOWEVER, to all restrictions, exceptions, reservations, easements and conditions as contained in prior deeds of conveyance.

Property known as: RR 1 Box 141, Iriona, PA 16656 a/k/a 624 Frailey Road.

Tax ID #: 109-G16-000-00029 (Control #1090-51344)

ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

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

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

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

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

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

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

EXHIBIT A

HOMEOWNER'S NAME(S):	John C. Suhoney Jr. Robin L. Suhoney
PROPERTY ADDRESS:	RR 1 Box 141 Irving PA 16656
LOAN ACCT. NO.:	009191796219
ORIGINAL LENDER:	The CIT Group/Consumer Finance Inc
CURRENT LENDER:	The CIT Group/Consumer Finance Inc

HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM

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

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

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR
CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR
MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE
PENNSYLVANIA HOUSING FINANCE AGENCY.

TEMPORARY STAY OF FORECLOSURE -- Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the consumer credit counseling agencies listed at the end of this Notice. THIS MEETING MUST OCCUR WITHIN
THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE
ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS
NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT", EXPLAINS HOW TO
BRING YOUR MORTGAGE UP TO DATE.

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

APPLICATION FOR MORTGAGE ASSISTANCE -- Your mortgage is in default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your

face- to-face meeting.

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

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

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

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

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

NATURE OF THE DEFAULT -- The MORTGAGE debt held by the above lender on your property located at:

**RR 1 Box 141
Iriona PA 16656**

IS SERIOUSLY IN DEFAULT because:

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

Monthly Payments of \$477.23 for June 1, 2005 thru August 1, 2006 = \$7158.45

Monthly Late Charges of \$0 for June 1, 2005 thru August 1, 2006 = \$0.00

Other charges (explain/itemize): _____

TOTAL AMOUNT PAST DUE: \$7158.45

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable): **N/A**

HOW TO CURE THE DEFAULT -- You may cure the default within THIRTY (30) DAYS of the date of this notice BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS **\$7158.45**, PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:

**Udren Law Offices, P.C.
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620**

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.): **N/A**

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

IF THE MORTGAGE IS FORECLOSED UPON -- The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

OTHER LENDER REMEDIES -- The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage. If your debt has been discharged in bankruptcy without your having reaffirmed it, then lender cannot pursue this remedy.

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

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

HOW TO CONTACT THE LENDER:

Name of Lender/Servicer:	CIT
Address:	715 South Metropolis Avenue Suite 150
Phone Number:	Oklahoma City OK 73108
Fax Number:	(800) 621-1437
Contact Person:	(405) 553-4790
	Customer Service

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

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

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

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

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400

YOU MAY ALSO HAVE THE RIGHT:

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

CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY

CLEARFIELD COUNTY

Keystone Economic Development Corporation
1954 Mary Grace Lane
Johnstown, PA 15901
(814) 535-6556
FAX (814) 539-1688

CCCS of Western Pennsylvania, Inc.
217 E. Plank Road
Altoona PA 16602
(814) 944-8100
FAX (814) 944-5747

CCCS of Western PA
219-A College Park Plaza
Johnstown PA 15904
(814) 539-6335
FAX n/a

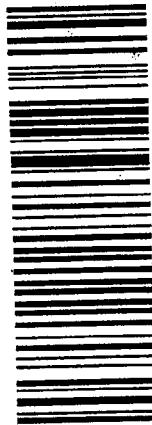
Indiana Co. Community Action Program
827 Water Street, Box 187
Indiana, PA 15701
(724) 465-2657
FAX (412) 465-5118

CCCS of Northeastern PA
1631 S Atherton St., Suite 100
State College, PA 16801
(814) 238-3668
FAX (814) 238-3669

Dec 23 2003 (Deferrals)

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

Robin L. Suhoney
RR1 Box 141
Invona PA 16656



U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT <i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$ 03
Certified Fee	240
Return Receipt Fee (Endorsement Required)	105
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 488
Postmark Here	
<p>Sent To: <u>Robin L. Suhoney</u> Street, Apt. No., or PO Box No. <u>221 Box 141</u> City, State, ZIP+4 <u>Invona PA 16656</u></p>	
PS Form 3800, June 2002	
See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	
<p>1. Article Addressed to:</p> <p><i>Ronald L. Sanchez R.R. 2 Box 1111 Irving, PA 16446</i></p>	
<p>COMPLETE THIS SECTION ON DELIVERY</p>	
<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery</p>	
<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>* If YES, enter delivery address below:</p> <p> </p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

2. Article Number (Transfer from service label)	7006 0100 0005 3898 2375
PS Form 3811, February 2004 Domestic Return Receipt	

Mail Mail Providers: mailing recipient for your mailpiece unique identifier kept by the Postal Service for two years return Mail may ONLY be combined with First-Class Mail or Priority Mail. **INSURANCE COVERAGE IS PROVIDED WITH CERTIFIED MAIL.** Please consider insured or Registered Mail. **Priority Mail** is not available for any class of international mail. **Priority Mail** may be combined with First-Class Mail or Priority Mail. **Return Receipt** for your mailpiece unique identifier kept by the Postal Service for two years **RETRIEVABLE MAIL** is an additional fee. A Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and send applicable postage to cover the additional fee. **Endorsements** return receipt, a USPS® Postmark on your Certified Mail receipt or an addressee's unauthorized delivery. **Delivery Address** or an addressee's unauthorized delivery may be restricted to the addressee with a postmark on the Certified Mail receipt or mark the mailpiece with a postmark on the reverse side of the envelope. **Delivery Address** is not needed, detach and affix label with postage and mail. **PORTANT: Save this receipt and present it when making an inquiry** or addressed to APDs and FPOs.

30080334 Referrals

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



John C. Suhoney Jr.
RR1 Box 141
Irvona PA 16656

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com ®	
OFFICIAL USE	
Postage	\$ 03
Certified Fee	240
Return Receipt Fee (Endorsement Required)	105
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 488
Sent To: John C. Suhoney Jr.	
Street, Apt. No., or PO Box No. 201 Box 141	
City, State, ZIP+4 Irvona PA 16656	
PS Form 3800, June 2002	
See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION

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

COMPLETE THIS SECTION ON DELIVERY

X Organization	
B. Received by (Printed Name)	C. Date of Delivery
D. Is delivery address different from item 1? If YES, enter delivery address below:	
4. Restricted Delivery? (Extra Fee)	
3. Service Type	
<input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
4. Restricted Delivery? (Extra Fee)	
<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Agent <input type="checkbox"/> Addressee	

2. Article Number (Transfer from service label)	7006 0100 0005 3898 2382
PS Form 3811, February 2004	Domestic Return Receipt
102595-02-M-1540	

V E R I F I C A T I O N

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation unless designated otherwise; that he is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.



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

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

The CIT Group/Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irsvona, PA 16656
Defendant(s)

ATTORNEY FOR PLAINTIFF

BY CERTIFY THE
BE A TRUE AND
COPY OF THE ORIGINAL

COURT OF COMMON PLEAS
CIVIL DIVISION

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

SEP 27 2006

NO. 06-1571-C Attest.

William Lehman
Prothonotary/
Clerk of Courts

COMPLAINT IN MORTGAGE FORECLOSURE

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

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

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

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentear una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641 x 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

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

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: N/a

Assignments of Record to: N/a

Recording Date: N/a

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: RR1 Box 141

MUNICIPALITY/TOWNSHIP/BOROUGH: Chest Township

COUNTY: Clearfield

DATE EXECUTED: 1/12/01

DATE RECORDED: 1/24/01 INSTRUMENT #: 200100946

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

(a) by failing or refusing to pay the installments of

principal and interest when due in the amounts indicated below;

(b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 8/11/06:

Principal of debt due	\$42,848.97
Unpaid Interest at 11.99002% from 5/1/05 to 8/11/06 (the per diem interest accruing on this debt is \$28.16 and that sum should be added each day after 8/11/06)	11,708.18
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Escrow Overdraft/ (Balance) (The monthly escrow on this account is \$0 and that sum should be added on the first of each month after 8/11/06)	
Recoverable Balance	683.38
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,142.45</u>
TOTAL	\$57,987.98

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time

limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$57,987.98 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.



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

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

BEGINNING at an iron pin (found) at the Southeastern Right-of-Way of Township Road No. T-417 having a 33 foot wide Roadway and at corner of former grantor; thence by name South 29 degrees 43 minutes 40 seconds East a distance of 116.13 feet to an iron pipe (found); thence South 34 degrees 54 minutes 23 seconds West a distance of 200.49 feet to an iron pipe (found); thence North 66 degrees 49 minutes 46 seconds West a distance of 226.22 feet to an iron pipe (set) on the Southeastern Right-of-Way of Township Road No. T-417; thence by said Right-of-Way North 54 degrees 58 minutes 08 seconds East a distance of 245.23 feet to a point within the said Township Road; thence along said Township Road North 61 degrees 06 minutes 28 seconds East a distance of 73.45 feet to an iron pin, the place of beginning. Containing 0.95522 acres by calculation and more particularly shown on plan of Survey by Fred H. Shuss, P.E., dated December 7, 1994 and attached to prior deed of record.

SUBJECT, HOWEVER, to all restrictions, exceptions, reservations, easements and conditions as contained in prior deeds of conveyance.

Property known as: RR 1 Box 141, Iriona, PA 16656 a/k/a 624 Frailey Road.

Tax ID #: 109-G16-000-00029 (Control #1090-51344)

ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

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

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

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

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

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

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO **THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM** EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

EXHIBIT A

HOMEOWNER'S NAME(S):	John C. Suhoney Jr. Robin L. Suhoney
PROPERTY ADDRESS:	RR 1 Box 141 Irion PA 16656
LOAN ACCT. NO.:	009191796219
ORIGINAL LENDER:	The CIT Group/Consumer Finance Inc
CURRENT LENDER:	The CIT Group/Consumer Finance Inc

HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM

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

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

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.

TEMPORARY STAY OF FORECLOSURE -- Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the consumer credit counseling agencies listed at the end of this Notice. **THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT", EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.**

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

APPLICATION FOR MORTGAGE ASSISTANCE -- Your mortgage is in default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your

face- to-face meeting.

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

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

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

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

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

NATURE OF THE DEFAULT -- The MORTGAGE debt held by the above lender on your property located at:

RR 1 Box 141
Irving PA 16656

IS SERIOUSLY IN DEFAULT because:

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

Monthly Payments of \$477.23 for June 1, 2005 thru August 1, 2006 = \$7158.45

Monthly Late Charges of \$0 for June 1, 2005 thru August 1, 2006 = \$0.00

Other charges (explain/itemize): _____

TOTAL AMOUNT PAST DUE: \$7158.45

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable): N/A

HOW TO CURE THE DEFAULT -- You may cure the default within THIRTY (30) DAYS of the date of this notice BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS \$7158.45 PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:

Udren Law Offices, P.C.
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.): N/A

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

IF THE MORTGAGE IS FORECLOSED UPON -- The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

OTHER LENDER REMEDIES -- The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage. If your debt has been discharged in bankruptcy without your having reaffirmed it, then lender cannot pursue this remedy.

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

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

HOW TO CONTACT THE LENDER:

Name of Lender/Servicer:	CIT
Address:	715 South Metropolis Avenue Suite 150 Oklahoma City OK 73108
Phone Number:	(800) 621-1437
Fax Number:	(405) 553-4790
Contact Person:	Customer Service

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

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

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

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

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400

YOU MAY ALSO HAVE THE RIGHT:

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

CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY

CLEARFIELD COUNTY

Keystone Economic Development Corporation
1954 Mary Grace Lane
Johnstown, PA 15901
(814) 535-6556
FAX (814) 539-1688

CCCS of Western Pennsylvania, Inc.
217 E. Plank Road
Altoona PA 16602
(814) 944-8100
FAX (814) 944-5747

CCCS of Western PA
219-A College Park Plaza
Johnstown PA 15904
(814) 539-6335
FAX n/a

Indiana Co. Community Action Program
827 Water Street, Box 187
Indiana, PA 15701
(724) 465-2657
FAX (412) 465-5118

CCCS of Northeastern PA
1631 S Atherton St., Suite 100
State College, PA 16801
(814) 238-3668
FAX (814) 238-3669

Successive Deferrals

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



U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$ 03
Certified Fee	240
Return Receipt Fee (Endorsement Required)	105
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 488
Postmark Here	
<i>Robin L. Suhoney</i> 221 Box 141 Irwin PA 16656	
PS Form 3800, June 2002	
See Reverse for Instructions	

Robin L. Suhoney
RR1 Box 141
Irwin PA 16656

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>1. Article Addressed to:</p> <p>DONALD L. SENCIN</p> <p>222 BULL</p> <p>INVADA DRILLING CO.</p>	
<p>2. Article Mailed To:</p> <p>DONALD L. SENCIN</p> <p>222 BULL</p> <p>INVADA DRILLING CO.</p>		<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>X</p> <p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>- If YES, enter delivery address below:</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>4. Restricted Delivery? (Extra Fee)</p> <p><input type="checkbox"/> Yes</p>			

2. Article Number <i>(Transfer from service label)</i>		7006 0100 0005 3898 2375
PS Form 3811, February 2004	Domestic Return Receipt	
102595-02-M-1540		

3008034 Referrals

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



U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$ 03
Certified Fee	240
Return Receipt Fee (Endorsement Required)	105
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 488
Postmark Here	
Sent To <u>John C. Suhoney Jr.</u>	
Street, Apt. No. or PO Box No. <u>281 Box 141</u>	
City, State, ZIP+4 <u>Irvinia PA 16456</u>	
PS Form 3800, June 2002	
See Reverse for Instructions	

John C. Suhoney Jr.
RR1 Box 141
Irvinia PA 16456

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.

COMPLETE THIS SECTION ON DELIVERY

X		D. Is delivery address different from item 1? If YES, enter delivery address below:									
B. Received by (Printed Name)		C. Date of Delivery									
4. Restricted Delivery? (Extra Fee)		E.									
<p>3. Service Type</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 33%;"><input checked="" type="checkbox"/> Certified Mail</td> <td style="width: 33%;"><input type="checkbox"/> Express Mail</td> <td style="width: 33%;"><input type="checkbox"/> Agent</td> </tr> <tr> <td><input type="checkbox"/> Registered</td> <td><input checked="" type="checkbox"/> Return Receipt for Merchandise</td> <td><input type="checkbox"/> Addressee</td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td><input type="checkbox"/> C.O.D.</td> <td></td> </tr> </table>			<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail	<input type="checkbox"/> Agent	<input type="checkbox"/> Registered	<input checked="" type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Addressee	<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.	
<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail	<input type="checkbox"/> Agent									
<input type="checkbox"/> Registered	<input checked="" type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> Addressee									
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.										

2. Article Number (Transfer from service label)	7006 0100 0005 3898 2382
PS Form 3811, February 2004	Domestic Return Receipt
102595-02-M-1540	

V E R I F I C A T I O N

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff, a corporation unless designated otherwise; that he is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.



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

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

The CIT Group/ Consumer
Finance, Inc.
Plaintiff

v.
John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

ATTORNEY FOR PLAINTIFF

FILED NO CC
M110:SlabX
JAN 10 2007 (612)

William A. Shaw
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1571-CD

MOTION FOR SPECIAL SERVICE PURSUANT
TO SPECIAL ORDER OF COURT

Plaintiff, by its counsel, Mark J. Udren, Esquire, moves this Honorable Court for an Order directing service of the Complaint in Mortgage Foreclosure upon Defendant(s), John Calvin Suhoney, Jr. and Robin Lynn Suhoney by regular mail and certified mail, and by posting the mortgaged premises, and in support thereof avers the following:

1. Process was unable to be served at the then last known address of said Defendant(s) at RR1 Box 141, Irvona, PA 16656, which is the mortgaged premises. A copy of the Verification of Service is attached hereto as Exhibit A.

2. Pursuant to Pa.R.C.P. 430, Plaintiff made a Good Faith Investigation, the report thereof being attached hereto as Exhibit B.

3. Said investigation was unable to determine an alternate

address for said Defendant(s).

4. The last known address of Defendant(s) is as set forth in the attached Exhibits.

WHEREFORE, Plaintiff prays and respectfully requests that this Honorable Court enter an Order pursuant to Pa.R.C.P. 430 directing service of the Complaint in Mortgage Foreclosure upon said Defendant(s), John Calvin Suhoney, Jr. and Robin Lynn Suhoney by regular mail and certified mail, and by posting the mortgaged premises.

UDREN LAW OFFICES, P.C.

By: 
Mark J. Udren, Esquire
Attorney for Plaintiff

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
Plaintiff

v.
John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 06-1571-CD

VERIFICATION OF SERVICE

Based upon information supplied by the Sheriff of Clearfield County, service of the Complaint in Mortgage Foreclosure upon the below listed Defendant(s) was unsuccessful in accordance with Pa.R.C.P. 402 or 3129.2:

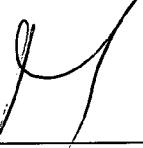
Defendant: John Calvin Suhoney

Place of Service: RR1 Box 141
Irsvona, PA 16656

Defendant not found because: Moved Unknown No Answer
Vacant Other per sheriff dept after several attempts service
was unable to be made, as the property is vacant.

Mark J. Udren, Esquire, the undersigned, understands that the statements herein set forth above are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

January 9, 2007



Mark J. Udren, Esquire
Attorney for Plaintiff

EXHIBIT A

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer Finance, Inc. Plaintiff	COURT OF COMMON PLEAS CIVIL DIVISION Clearfield County
v. John Calvin Suhoney, Jr. Robin Lynn Suhoney Defendant(s)	MORTGAGE FORECLOSURE NO. 06-1571-CD

VERIFICATION OF SERVICE

Based upon information supplied by the Sheriff of Clearfield County, service of the Complaint in Mortgage Foreclosure upon the below listed Defendant(s) was unsuccessful in accordance with Pa.R.C.P. 402 or 3129.2:

Defendant: Robin Lynn Suhoney

Place of Service: RR1 Box 141
Irsvona, PA 16656

Defendant not found because: Moved Unknown No Answer
Vacant Other per sheriff dept after several attempts service
was unable to be made, as the property is vacant.

Mark J. Udren, Esquire, the undersigned, understands that the statements herein set forth above are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

January 9, 2007



Mark J. Udren, Esquire
Attorney for Plaintiff

Players National Locator, Inc.

AFFIDAVIT OF GOOD FAITH INVESTIGATION

Loan Number: 06080334

Attorney Firm: MARK J UDREN & ASSOCIATES

Case Number:

Subject: John Suhoney and Robin Suhoney

A.K.A.: John C Suhoney
Robin L Suhoney

Last Known Address: RR 1 Box 141
Iriona, PA 16656

Last Known Number: () -

Melissa Kozma, being duly sworn according to law, deposes and says:

1. I am employed in the capacity of Location Specialist for Players National Locator, Inc.
2. On 11/28/2006, I conducted an investigation into the whereabouts of the above named defendant(s). The results of my investigation are as follows:

CREDIT INFORMATION -

A. SOCIAL SECURITY NUMBER(S): 163-58-1587 171-68-9108

B. EMPLOYMENT SEARCH:

We were unable to verify current employment for John Suhoney or Robin Suhoney.

C. INQUIRY OF CREDITORS:

Creditors indicated the last reported address for John Suhoney and Robin Suhoney is RR 1 Box 141, Iriona, PA 16656 with no valid home number.

INQUIRY OF TELEPHONE COMPANY -

A. DIRECTORY ASSISTANCE SEARCH:
Directory assistance had no listing for John Suhoney or Robin Suhoney. We called (814) 342-4127 and spoke with a relative who stated John Suhoney and Robin Suhoney have moved from RR 1 Box 141, Iriona, PA 16656. She gave John's cell phone number of 814-553-7849. We contacted the cell phone number and spoke to John who refused to release any information. We were unable to confirm any other address.

INQUIRY OF NEIGHBORS -

We were unable to contact any neighbors to confirm any other information.

INQUIRY OF POST OFFICE -

A. NATIONAL ADDRESS UPDATE:
As of November 21, 2006 the National Change of Address (NCOA) has no change for John Suhoney or Robin Suhoney from RR 1 Box 141, Iriona, PA 16656.

MOTOR VEHICLE REGISTRATION -

A. MOTOR VEHICLE & DMV OFFICE:
We were unable to verify current drivers license information for John Suhoney or Robin Suhoney.

OTHER INQUIRIES -

A. DEATH RECORDS:
As of November 21, 2006 the Social Security Administration has no death records on file for John Suhoney or Robin Suhoney and/or A.K.A's under the social security numbers provided.

EXHIBIT B

B. PUBLIC LICENSES (PILOT, REAL ESTATE, ETC.):

None Found.

C. COUNTY VOTER REGISTRATION:

We were unable to confirm a listing with the County Voters Registration Office.

ADDITIONAL INFORMATION ON SUBJECT -

A. DATE OF BIRTH:

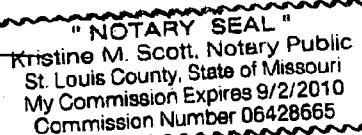
John - May 1971

Robin - We were unable to verify a date of birth

AFFIANT Melissa Kozma

Subscribed and sworn to before me on 11/28/2006

NOTARY PUBLIC



Players National Locator, Inc. 174 Clarkson Road, Suite 225 St. Louis, MO 63011
Phone: (636)230-9922 Fax: (636)230-0558

VERIFICATION

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

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

UDREN LAW OFFICES, P.C.

Date: January 9, 2007



Mark J. Udren, Esquire
Attorney for Plaintiff

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.
John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

NO. 06-1571-CD

CERTIFICATE OF SERVICE

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

X Regular First Class Mail

Certified Mail

Other

Date Served: January 9, 2007

TO: John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irvington, PA 16656

UDREN LAW OFFICES, P.C.

By: 
Mark J. Udren, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
CIVIL DIVISION

The CIT Group/ Consumer
Finance, Inc.

Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

John Calvin Suhoney, Jr.

Robin Lynn Suhoney

Defendant(s)

NO. 06-1571-CD

O R D E R

AND NOW, this day of , 20 , upon
consideration of Plaintiff's Motion and the Affidavit of Good Faith
investigation attached hereto, it is hereby ORDERED that service of
the Complaint in Mortgage Foreclosure and all subsequent pleadings
on Defendant(s), John Calvin Suhoney, Jr. and Robin Lynn Suhoney,
shall be complete when Plaintiff or its counsel or agent has mailed
true and correct copies of the Complaint in Mortgage Foreclosure
and all subsequent pleadings by certified mail and regular mail to
the last known address of Defendant(s), John Calvin Suhoney, Jr.
and Robin Lynn Suhoney at RR1 Box 141, Irvona, PA 16656 and by
posting the mortgaged premises located at RR1 Box 141, (Chest
Township) Irvona, PA 16656.

BY THE COURT:

J.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION
THE CIT GROUP / CONSUMER FINANCE, INC. *
Plaintiff *
vs. * NO. 06-1571-CD
JOHN CALVIN SUHONEY, JR., *
ROBIN LYNN SUHONEY, *
Defendants *

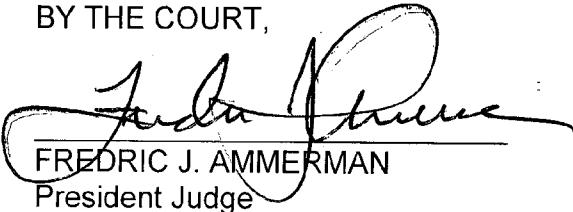
O R D E R

NOW, this 11th day of January, 2007, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon the Defendants **John Calvin Suhoney, Jr.** and **Robin Lynn Suhoney**, by :

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to RR 1, Box 141, Irvona, PA 16656;
3. By certified mail, return receipt requested, to RR 1, Box 141, Irvona, PA 16656; and
4. By posting the mortgaged premises known in this herein action as RR1, Box 141, (Chest Township) Irvona, PA 16656.

Service of the aforementioned publication and mailings is effective upon the date of publication and mailing and is to be done by Plaintiff's attorney, who will file Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,


FREDRIC J. AMMERMAN
President Judge

FILED 300
01/11/2007 Atty Udran
JAN 11 2007
GW

William A. Shaw
Prothonotary/Clerk of Courts

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

The CIT Group/ Consumer
Finance, Inc.
Plaintiff

v.
John Calvin Suhoney, Jr.
Robin Lynn Suhoney

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1571-CD

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY:

Kindly reinstate the Complaint on the above-captioned matter.

DATE: January 17, 2007

UDREN LAW OFFICES, P.C.


Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

FILED

JAN 18 2007
m / 1:00 am
William A. Shaw
Prothonotary/Clerk of Courts
CENT TO ATTY

2 REINSTATE COMPLAINT
to S&P

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION
THE CIT GROUP / CONSUMER FINANCE, INC. Plaintiff *
vs. *
JOHN CALVIN SUHONEY, JR., *
ROBIN LYNN SUHONEY, *
Defendants * NO. 06-1571-CD
*

ORDER

NOW, this 11th day of January, 2007, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon the Defendants **John Calvin Suhoney, Jr.** and **Robin Lynn Suhoney**, by :

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to RR 1, Box 141, Irvona, PA 16656;
3. By certified mail, return receipt requested, to RR 1, Box 141, Irvona, PA 16656; and
4. By posting the mortgaged premises known in this herein action as RR1, Box 141, (Chest Township) Irvona, PA 16656.

Service of the aforementioned publication and mailings is effective upon the date of publication and mailing and is to be done by Plaintiff's attorney, who will file Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,

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

/s/ Fredric J. Ammerman

FREDRIC J. AMMERMAN
President Judge

JAN 11 2007

Attest.

William Ammerman
Prothonotary/
Clerk of Courts

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

The CIT Group/Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irsvona, PA 16656
Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

FILED
12/5/06
SEP 2006

William A. Shaw
Prothonotary/Clerk of Courts

NO. 06-1571-CD

COMPLAINT IN MORTGAGE FORECLOSURE

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

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

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

COPY

06080334 DB

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irsvona, PA 16656
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1571-CD

PRAEICE TO FILE PROOF OF PUBLICATION

TO THE PROTHONOTARY:

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

UDREN LAW OFFICES, P.C.

BY 
Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

DATE: February 23, 2007

FILED *no cc*
m1019734
FEB 26 2007 (GR)

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF
COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION-LAW
NO. 06-1571-CB
NOTICE OF ACTION IN
MORTGAGE FORECLOSURE
THE CIT GROUP/CONSUMER
FINANCE, INC., PLAINTIFF vs.
CALVIN SUHONEY, JR. and RO-
BIN LYNN SUHONEY, DEFEN-
DANTS

TO: JOHN CALVIN SUHONEY,
JR. and ROBIN LYNN SUHONEY,
Defendants, whose last known ad-
dress is RR1, Box 141, (Chest
Township) Irvin, PA 16656.

COMPLAINT IN

MORTGAGE FORECLOSURE
You are hereby notified that Plaintiff,
THE CIT GROUP/CONSUMER
FINANCE, INC., has filed a Mort-
gage Foreclosure Complaint end-
orsed with a Notice to Defend,
against you in the Court of Common
Pleas of Clearfield County, Penn-
sylvania, docketed to No.
06-1571-CB, wherein Plaintiff
seeks to foreclose on the mortgage
secured on your property located,
RR1, Box 141, (Chest Township),
Irvin, PA 16656, whereupon
your property would be sold by the
Sheriff of Clearfield County.

NOTICE

YOU HAVE BEEN SUED IN
COURT. If you wish to defend
against the claims set forth in the
notice above, you must take action
within twenty (20) days after this
Complaint and Notice are served,
by entering a written appearance
personally or by attorney and filing
in writing with the Court your de-
fenses 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 no-
tice 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 PA-
PER TO YOUR LAWYER AT
ONCE. IF YOU DO NOT HAVE A
LAWYER GO TO OR TELEPHONE
THE OFFICE SET FORTH BELOW.
THIS OFFICE CAN PROVIDE YOU
WITH THE INFORMATION ABOUT
HIRING A LAWYER. IF YOU CAN-
NOT AFFORD TO HIRE A LAW-
YER, THIS OFFICE MAY BE ABLE
TO PROVIDE YOU WITH INFOR-
MATION ABOUT AGENCIES THAT
MAY OFFER LEGAL SERVICES
TO ELIGIBLE PERSONS AT A RE-
DUCED FEE OR NO FEE.

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

MARK J. UDREN
ATTORNEY FOR PLAINTIFF
UDREN LAW OFFICES, P.C.
WOODCREST
CORPORATE CENTER
111 WOODCREST ROAD
SUITE 200
CHERRY HILL,
NJ 08003-3620
856-669-5400

1:22-1d-b

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :
: SS:
COUNTY OF CLEARFIELD :

On this 29th day of January, A.D. 2007,
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 January 22, 2007.
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

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

:

COUNTY OF CLEARFIELD :

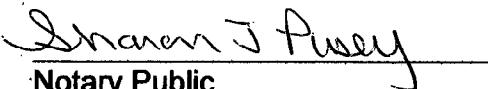
:

On this 2nd day of February 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 February 2, 2007, Vol. 18 No. 5. 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.



Sharon J. Pusey
Notary Public
My Commission Expires

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

William J Mansfield Inc
The Woods, Suite 1209
998 Old Eagle School Rd
Wayne PA 19087-1805

卷之三十一

（1980年1月26日）

0.1975472190 17 MAY 1968

卷之三

FILED

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW
NO. 06-1571-CD

NOTICE OF ACTION IN MORTGAGE
FORECLOSURE

THE CIT GROUP/CONSUMER
FINANCE, INC., PLAINTIFF vs. JOHN
CALVIN SUHONEY, JR. and ROBIN LYNN
SUHONEY, DEFENDANTS

TO: JOHN CALVIN SUHONEY, JR. and
ROBIN LYNN SUHONEY, Defendants,
whose last known address is RR1, Box 141,
(Chest Township) Irvona, PA 16656.

COMPLAINT IN MORTGAGE
FORECLOSURE

You are hereby notified that Plaintiff,
THE CIT GROUP/CONSUMER FINANCE,
INC., has filed a Mortgage Foreclosure
Complaint endorsed with a Notice to Defend,
against you in the Court of Common Pleas
of Clearfield County, Pennsylvania,
docketed to NO. 06-1571-CD, wherein
Plaintiff seeks to foreclose on the mortgage
secured on your property located, RR1, Box
141, (Chest Township), Irvona, PA 16656,
whereupon your property would be sold by
the Sheriff of Clearfield County.

NOTICE

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

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

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

MARK J. UDREN, ATTORNEY FOR

PLAINTIFF, UDREN LAW OFFICES, P.C.,
WOODCREST CORPORATE CENTER,
111 WOODCREST ROAD, SUITE 200,
CHERRY HILL, NJ 08003-3620, 856-669-
5400.

JANET FOX; CATHY WARGO; COLLEEN VILLIE; BRIAN ENGLISH; SHIRLEY COBLE; JOAN HOOPER; MELISSA YARNELL; LIZABETH GUENOT; BRIAN E. ENGLISH; MICHAEL ENGLISH; LORETTA G. FLEGAL; VICKY LANDRY; CINDY BOUDREAUX; PENNY BALTIMORE; BURTON ENGLISH, JR.; BARRY ENGLISH; and All other persons claiming any interest in the property described in this action Defendants

NOTICE TO DEFEND

If you wish to defend, you must enter a written appearance personally or by attorney and filing 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 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.

Court Administrator's Office CLEARFIELD COUNTY COURTHOUSE, Corner of Second & Market Streets, Clearfield, PA 16830, Telephone: (814) 765-2641 Ext. 5982.

LEGAL NOTICE

TO: DAVID R. HOUSER, a/k/a DAVID HOUSER, a/k/a D. R. HOUSER, KYLER & TOOL, J. T. MURPHY, a/k/a THOMAS MURPHY, DAVID W. ENGLISH, a/k/a DAVID ENGLISH, a/k/a D. W. ENGLISH, ESTHER ENGLISH HUBLER, MARY MILDRED ENGLISH RENZULLI, BEVERLY KAVELAK, ALBERT ENGLISH, RAY A. ENGLISH, ALVIN ENGLISH, WILLIAM ENGLISH, LYLE ENGLISH, ALVIN ENGLISH, GLEN ENGLISH, DANIEL ENGLISH, EDWARD ENGLISH, BURTON ENGLISH, SR., PAMELA EMIGH, BEVERLY KYLER, DENNIS HUBLER, ROY HUBLER, LEWIS RENZULLI, JR., PATTY HICKOK, BEVERLY PASSMORE, PHYLLIS LUZIER, DORIS WASHBURN, JAMES ENGLISH, JANET FOX, CATHY WARGO, COLLEEN VILLIE, BRIAN ENGLISH, SHIRLEY COBLE, JOAN HOOPER, MELISSA YARNELL, LIZABETH GUENOT, BRIAN E. ENGLISH, MICHAEL ENGLISH, LORETTA G. FLEGAL, VICKY LANDRY,

formerly of Ida E. Buys; thence Easterly by line of said other lands formerly of Ida E. Buys, 150 feet, more or less, to a post at an alley; thence South 30 degrees 45 minutes West by line of said alley 43 feet to a post; thence Westerly in a straight line parallel with and at all points 43 feet distant

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.
John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

NO. 06-1571-CD

VERIFICATION OF SERVICE BY CERTIFIED MAIL AND
REGULAR MAIL PURSUANT TO COURT ORDER

The undersigned hereby verifies that he is counsel for Plaintiff in the above case and that pursuant to the Court order issued in this matter he mailed a true and correct copy of the Complaint in Mortgage Foreclosure to Defendant(s), by certified mail and regular first class mail, to the last known address of Defendant(s) as follows:

DATE MAILED: 3/10/07

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irvona, PA 16656

I verify that the statements made herein are true and correct and I understand that false statements made herein are subject to the penalties relating to unsworn falsification to authorities.

Dated: 3/10/07

UDREN LAW OFFICES, P.C.

Mark J. Udren, Esquire
Attorney for Plaintiff

FILED NO CC
MARCH 10 2007
MAR 09 2007
GK

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102351
NO: 06-1571-CD
SERVICE # 1 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE &

ORDER

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE, INC.

vs.

DEFENDANT: JOHN CALVIN SUHONEY, JR. and ROBIN LYNN SUHONEY

SHERIFF RETURN

NOW, January 31, 2007 AT 2:04 PM POSTED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE & ORDER AT 624 FRAILEY ROAD, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA.(JOHN CALVIN SUHONEY JR.)

SERVED BY: DAVIS / MORGILLO

FILED
99:00 LM JM
APR 25 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102351
NO: 06-1571-CD
SERVICE # 2 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE &

ORDER

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE, INC.

vs.

DEFENDANT: JOHN CALVIN SUHONEY, JR. and ROBIN LYNN SUHONEY

SHERIFF RETURN

NOW, January 31, 2007 AT 2:04 PM POSTED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE & ORDER AT 624 FRAILEY ROAD, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA. (ROBIN LYNN SUHONEY)

SERVED BY: DAVIS / MORGILLO

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102351
NO: 06-1571-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE &

ORDER

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE, INC.

vs.

DEFENDANT: JOHN CALVIN SUHONEY, JR. and ROBIN LYNN SUHONEY

SHERIFF RETURN

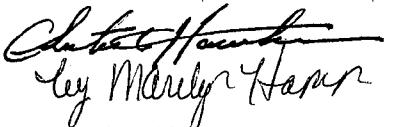
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	80258	20.00
SHERIFF HAWKINS	UDREN	80258	41.19

Sworn to Before Me This

So Answers,

____ Day of _____ 2007


Chester A. Hawkins
Sheriff

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irsvona, PA 16656
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 06-1571-CD

FILED Atty pd.
MAY 01 2007 34/31
20.00
Notice to
Def's.

William A. Shaw
Prothonotary/Clerk of Courts

Statement
to Atty
(K)

**PRAECIPE FOR JUDGMENT FOR FAILURE TO
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) **John Calvin Suhoney, Jr. and Robin Lynn Suhoney** for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$57,987.98
Interest Per Complaint	<u>7,293.44</u>
From 8/12/06 to 4/27/07	
 TOTAL	 <u>\$65,281.42</u>

I hereby certify that (1) the addresses of the Plaintiff and Defendant are as shown above, and (2) that notice has been given in accordance with Rule 237.1, a copy of which is attached hereto.

UDREN LAW OFFICES, P.C.
Mark J. Udren, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: May 1, 2007


PRO PROTHY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102351
NO: 06-1571-CD
SERVICE # 1 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE &

ORDER

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE, INC.

vs.

DEFENDANT: JOHN CALVIN SUHONEY, JR. and ROBIN LYNN SUHONEY

COPY

SHERIFF RETURN

NOW, January 31, 2007 AT 2:04 PM POSTED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE & ORDER AT 624 FRAILEY ROAD, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA. (JOHN CALVIN SUHONEY JR.)

SERVED BY: DAVIS / MORGILLO

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102351
NO: 06-1571-CD
SERVICE # 2 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE &

ORDER

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE, INC.

vs.

DEFENDANT: JOHN CALVIN SUHONEY, JR. and ROBIN LYNN SUHONEY

SHERIFF RETURN

NOW, January 31, 2007 AT 2:04 PM POSTED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE & ORDER AT 624 FRAILEY ROAD, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA.(ROBIN LYNN SUHONEY)

SERVED BY: DAVIS / MORGILLO

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

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

PENNSYLVANIA OFFICE
215-568-9500

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

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PLEASE RESPOND TO NEW JERSEY OFFICE

February 23, 2007

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

Re: The CIT Group/ Consumer Finance, Inc.
vs.
John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Clearfield County C.C.P. No. 06-1571-CD

Gentlemen:

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

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

Thank you for your assistance with this matter.

Sincerely yours,



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

/MJU
Enclosure

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
NO. 06-1571-CD

v.
John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irvington, PA 16656
Defendant(s)

PRAECIPE TO FILE PROOF OF PUBLICATION

TO THE PROTHONOTARY:

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

UDREN LAW OFFICES, P.C.

BY 
Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

DATE: February 23, 2007

JANET FOX; CATHY WARGO; COLLEEN VILLIE; BRIAN ENGLISH; SHIRLEY COBLE; JOAN HOOPER; MELISSA YARNELL; LIZABETH GUENOT; BRIAN E. ENGLISH; MICHAEL ENGLISH; LORETTA G. FLEGAL; VICKY LANDRY; CINDY BOUDREAU; PENNY BALTIMORE; BURTON ENGLISH, JR.; BARRY ENGLISH; and All other persons claiming any interest in the property described in this action Defendants

NOTICE TO DEFEND

If you wish to defend, you must enter a written appearance personally or by attorney and filing 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 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.

Court Administrator's Office CLEARFIELD COUNTY COURTHOUSE, Corner of Second & Market Streets, Clearfield, PA 16830, Telephone: (814) 765-2641 Ext. 5982.

LEGAL NOTICE

TO: DAVID R. HOUSER, a/k/a DAVID HOUSER, a/k/a D. R. HOUSER, KYLER & TOOL, J. T. MURPHY, a/k/a THOMAS MURPHY, DAVID W. ENGLISH, a/k/a DAVID ENGLISH, a/k/a D. W. ENGLISH, ESTHER ENGLISH HUBLER, MARY MILDRED ENGLISH RENZULLI, BEVERLY KAVELAK, ALBERT ENGLISH, RAY A. ENGLISH, ALVIN ENGLISH, WILLIAM ENGLISH, LYLE ENGLISH, ALVIN ENGLISH, GLEN ENGLISH, DANIEL ENGLISH, EDWARD ENGLISH, BURTON ENGLISH, SR., PAMELA EMIGH, BEVERLY KYLER, DENNIS HUBLER, ROY HUBLER, LEWIS RENZULLI, JR., PATTY HICKOK, BEVERLY PASSMORE, PHYLLIS LUZIER, DORIS WASHBURN, JAMES ENGLISH, JANET FOX, CATHY WARGO, COLLEEN VILLIE, BRIAN ENGLISH, SHIRLEY COBLE, JOAN HOOPER, MELISSA YARNELL, LIZABETH GUENOT, BRIAN E. ENGLISH, MICHAEL ENGLISH, LORETTA G. FLEGAL, VICKY LANDRY,

formerly of Ida E. Buys; thence Easterly by line of said other lands formerly of Ida E. Buys, 150 feet, more or less, to a post at an alley; thence South 30 degrees 45 minutes West by line of said alley 43 feet to a post; thence Westerly in a straight line parallel with and at all points 43 feet distant

COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION LAW
NO. 06-1571-CD
NOTICE OF ACTION IN
MORTGAGE FORECLOSURE
THE CIT GROUP/CONSUMER
FINANCE, INC. PLAINTIFF VS.
CALVIN SUHONEY, JR. and RO-
BIN LYNN SUHONEY DEFEN-
DANTS
TO: JOHN CALVIN SUHONEY
JR. and ROBIN LYNN SUHONEY
Defendants, whose last known ad-
dress is RR1, Box 141, (Chest
Township) Ivona, PA 16656

COMPLAINT IN
MORTGAGE FORECLOSURE
You are hereby notified that Plaintiff, THE CIT GROUP/CONSUMER FINANCE, INC. has filed a Mortgage Foreclosure Complaint endorsed with a Notice to Defend against you in the Court of Common Pleas of Clearfield County, Pennsylvania, docketed to No. 06-1571-CD, wherein Plaintiff seeks to foreclose on the mortgage secured on your property located, RR1, Box 141, (Chest Township) Ivona, PA 16656, whereupon your property would be sold by the Sheriff of Clearfield County.

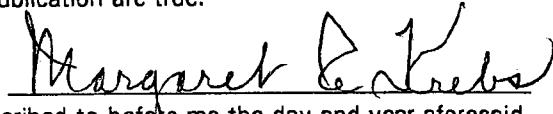
NOTICE
YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the notice above, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally, or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the

PROOF OF PUBLICATION

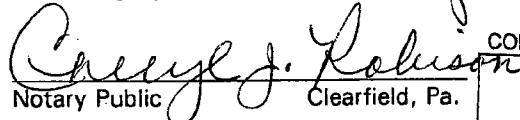
STATE OF PENNSYLVANIA :
: SS:
COUNTY OF CLEARFIELD :

On this 29th day of January, A.D. 2007, 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 January 22, 2007. 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.



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


Notary Public

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

UDREN LAW OFFICES, P.C.
BY: Mark J. Udran, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003
856-669-5400
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer Finance, Inc.
Plaintiff

v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1571-CD

TO: John Calvin Suhoney, Jr.
RR1 Box 141
Irvona, PA 16656

DATE of Notice: March 7, 2007

IMPORTANT NOTICE

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

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

NOTIFICACION IMPORTANTE

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUIRIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO IMMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASSISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL
LAWYER REFERRAL SERVICE
David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

/s/
Mark J. Udran, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, New Jersey 08003-3620

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

The CIT Group/ Consumer Finance, Inc.
Plaintiff
v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1571-CD

TO: Robin Lynn Suhoney
RR1 Box 141
Iriona, PA 16656

DATE of Notice: March 7, 2007

IMPORTANT NOTICE

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

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

NOTIFICACION IMPORTANTE

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUERIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO IMMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASSISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL
LAWYER REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

/s/
Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, New Jersey 08003-3620

UDREN LAW OFFICES, P.C.
BY: MARK J. UDREN, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
Plaintiff
v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE
NO. 06-1571-CD

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF NEW JERSEY

:
: SS

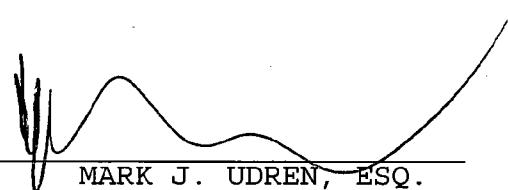
COUNTY OF CAMDEN

:

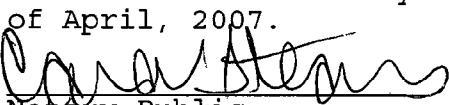
THE UNDERSIGNED being duly sworn, deposes and says that the averments herein are based upon investigations made and records maintained by us either as Plaintiff or as servicing agent of the Plaintiff herein and that the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Servicemembers' Civil Relief Act (108 P.L. 189; 117 Stat. 2835; 2003 Enacted H.R. 100), and that the age and last known residence and employment of each Defendant are as follows:

Defendant: John Calvin Suhoney, Jr.
Age: Over 18
Residence: As captioned above
Employment: Unknown

Defendant: Robin Lynn Suhoney
Age: Over 18
Residence: As captioned above
Employment: Unknown


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

Sworn to and subscribed
before me this 27th day
of April, 2007.


Notary Public

STATE OF NEW JERSEY
Notary Public

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

NO. 06-1571-CD

TO: John Calvin Suhoney, Jr.
RR1 Box 141
Irvona, PA 16656

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Prothonotary [Signature] Shilo7

Judgment by Default
 Money Judgment
 Judgment in Replevin
 Judgment for Possession
 Judgment on Award of Arbitration
 Judgment on Verdict
 Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-669-5400.

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

NO. 06-1571-CD

TO: Robin Lynn Suhoney
RR1 Box 141
Irsvona, PA 16656

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Prothonotary [Signature] 5/10/07

Judgment by Default
 Money Judgment
 Judgment in Replevin
 Judgment for Possession
 Judgment on Award of Arbitration
 Judgment on Verdict
 Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-669-5400.

COPY

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

CIT Group/Consumer Finance, Inc.
Plaintiff(s)

No.: 2006-01571-CD

COPY

Real Debt: \$65,281.42

Atty's Comm: \$

Vs. Costs: \$

Int. From: \$

John Calvin Suhoney Jr. Entry: \$20.00
Robin Lynn Suhoney
Defendant(s)

Instrument: Default Judgment

Date of Entry: May 1, 2007

Expires: May 1, 2012

Certified from the record this 1st day of May, 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

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

NO. 06-1571-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Please issue Writ of Execution in the above matter:

Amount due \$65,281.42

Interest From 4/28/07
to Date of Sale

Ongoing Per Diem of \$28.16
to actual date of sale including if sale is
held at a later date

(Costs to be added) \$ 132.00 Prothonotary costs

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE

ATTORNEY FOR PLAINTIFF

FILED

in his office
MAY 01 2007

William A. Shaw
Prothonotary/Clerk of Courts
Atty pd \$0.00
1CCS6 w/its w/prop.
descr. to Sheriff

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

NO. 06-1571-CD

C E R T I F I C A T E

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff in the above-captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

- An FHA insured mortgage
- Non-owner occupied
- Vacant
- Act 91 procedures have been fulfilled.
- Over 24 months delinquent.

This certification is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc. Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

NO. 06-1571-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

The CIT Group/ Consumer Finance, Inc. , Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at: RR1 Box 141(Chest Township), Irvona, PA 16656

John Calvin Suhoney, Jr. RR1 Box 141
Irvona, PA 16656

Robin Lynn Suhoney RR1 Box 141
Irvona, PA 16656

SAME AS #1 ABOVE

SAME AS #1 ABOVE

5. Name and address
record lien on the

13

Finance, Inc. Suite 150, Oklahoma City, OK 73108

PHFA

211 North Front Street
P.O. Box 15628
Harrisburg, PA 17101

5. Name and address of every other person who has any record lien on the property:

Name _____ Address _____

None

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

Name _____ Address _____

Real Estate Tax Dept.

1 North Second Street, Suite 116
Clearfield, PA 16830

Domestic Relations Section

1 North Second Street, Suite 116
Clearfield, PA 16830

Commonwealth of PA,
Department of Revenue

Bureau of Compliance, PO Box 281230
Harrisburg, PA 17128-1230

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

Name _____ Address _____

Tenants/Occupants

RR1 Box 141
(Chest Township)
Irvona, PA 16656

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

DATED: April 27, 2007

UDREN LAW OFFICES, P.C.

Mark J. Udren, ESQ.
Attorney for Plaintiff

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

ATTORNEY FOR PLAINTIFF

COPY

The CIT Group/ Consumer
Finance, Inc.
Plaintiff

v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 06-1571-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

To satisfy the judgment, interest and costs in the above matter,
you are directed to levy upon and sell the following described
property: RR1 Box 141
(Chest Township)
Irsvona, PA 16656
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$65,281.42

Interest From 4/28/07
to Date of Sale _____
Ongoing Per Diem of \$28.16
to actual date of sale including if sale is
held at a later date

(Costs to be added) \$ 132.00 Prothonotary costs
By Willie L. Sherry Prothonotary
Date 5/1/07 Clerk

COURT OF COMMON PLEAS
NO. 06-1571-CD

The CIT Group/ Consumer Finance, Inc.

vs.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 65,281.42

INTEREST \$ _____

from 4/28/07
to Date of Sale _____
Ongoing Per Diem of \$28.16
to actual date of sale including if sale is
held at a later date

COSTS PAID:
PROTHY \$ 132.00

SHERIFF \$ _____

STATUTORY \$ _____

COSTS DUE PROTHY. \$ _____

PREMISES TO BE SOLD:

RR1 Box 141
(Chest Township)
Irvington, PA 16656

Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 669-5400
pleadings@udren.com

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

BEGINNING at an iron pin (found) at the Southeastern Right-of-Way of Township Road No. T-417 having a 33 foot wide Roadway and at corner of former grantor; thence by name South 29 degrees 43 minutes 40 seconds East a distance of 116.13 feet to an iron pipe (found); thence South 34 degrees 54 minutes 23 seconds West a distance of 200.49 feet to an iron pipe (found); thence North 66 degrees 49 minutes 46 seconds West a distance of 226.22 feet to an iron pipe (set) on the Southeastern Right-of-Way of Township Road No. T-417; thence by said Right-of-Way North 54 degrees 58 minutes 08 seconds East a distance of 245.23 feet to a point within the said Township Road; thence along said Township Road North 61 degrees 06 minutes 28 seconds East a distance of 73.45 feet to an iron pin, the place of beginning. Containing 0.95522 acres by calculation and more particularly shown on plan of Survey by Fred H. Shuss, P.E., dated December 7, 1994 and attached to prior deed of record.

SUBJECT, HOWEVER, to all restrictions, exceptions, reservations, easements and conditions as contained in prior deeds of conveyance.

Property known as: RR 1 Box 141, Irvona, PA 16656 a/k/a 624 Frailey Road.

Tax ID #: 109-G16-000-00029 (Control #1090-51344)

BEING KNOWN AS: RR1 BOX 141
(CHEST TOWNSHIP)
IRVONA, PA 16656

PROPERTY ID NO.: 109-G16-000-00029 CONTROL NO.: 1090-51344

TITLE TO SAID PREMISES IS VESTED IN JOHN CALVIN SUHONEY, JR. AND ROBIN LYNN SUHONEY, HUSBAND AND WIFE BY DEED FROM KEVIN J. MICHAELS AND VALERIE A. MILLER NOW VALERIE A. MICHAELS, HUSBAND AND WIFE DATED 1/12/01 RECORDED 1/24/01 IN INSTRUMENT NO. 200100945.

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irvona, PA 16656

NO. 06-1571-CD

FILED NOCC
MILLION
AUG 06 2007
S

William A. Shaw
Prothonotary/Clerk of Courts

Defendant(s)

VERIFICATION OF SERVICE BY CERTIFIED MAIL AND
REGULAR MAIL PURSUANT TO COURT ORDER

The undersigned hereby verifies that he is counsel for Plaintiff in the above case and that pursuant to the Court order issued in this matter he mailed a true and correct copy of the notice of sale to Defendant(s), by certified mail and regular first class mail, to the last known address of Defendant(s) as follows:

DATE MAILED: July 2, 2007

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irvona, PA 16656

I verify that the statements made herein are true and correct and I understand that false statements made herein are subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Dated: August 1, 2007

UDREN LAW OFFICES, P.C.

Mark J. Udren, Esquire

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge	Act. Value (if Regis.)	Insured Value	Check appropriate block for Registered Mail:			Postmark and Date of Receipt
								<input type="checkbox"/> Registered	<input type="checkbox"/> Insured	<input type="checkbox"/> Return Receipt for Merchandise	
1		JOHN CALVIN SUHONEY, JR. RR1 BOX 141 IRVONA, PA 16656						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2		ROBIN LYNN SUHONEY RR1 BOX 141 IRVONA, PA 16656						<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15								<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Total number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)		The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to third and forth class parcels.						

PS Form 3877, February 1994

Form Must be Completed by Typewriter, Ink or Ball Point Pen

John Calvin Suhoney, Jr.
Robin Lynn Suhoney, #06080334 (Clearfield) 8/3/07

AC

TO: Robin Lynn Suhoney
RR1 Box 141
Irvinga, PA 16656

Your home in

NOTE OF SHERIFF'S SALE OF

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



0125 5200 1000 0546 9002
0125 5200 1000 0546 9002

0125 5170 0000 0546 9002

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

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

DUKEF16080334 (Sear)

Postage	\$	
Certified Fee		265
Return Receipt Fee (Endorsement Required)		215
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Postmark
Here

Sent To
Street, Apt. No. ROBIN LYNN SUHONEY RR1 BOX 141 IRVONA, PA
or PO Box No. 16656
City, State, ZIP+4

See Reverse for Instructions
PS Form 3800, August 2006

as

TO: John Calvin Suhoney, Jr.

RR1 Box 141
Irvinga, PA 16656

your home (real estate) at RR1 Box 141,

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



9007 5000 0500 9007
9007 5000 0500 9007
9007 5000 0500 9007
9007 5000 0500 9007

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
Suhoney J.C. 9/23/06	
Postage	\$
265	
Certified Fee	
215	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$
Postmark Here	
Sent To	
Street, Apt. No. JOHN CALVIN SUHONEY, JR. RR1 BOX 141 IRVONA, or PO Box No. PA 16656	
City, State, ZIP+4	

PS Form 3800, August 2006

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>1. Article Addressed to:</p> <p><u>JOHN CALVIN SUHONEY, JR. RR1 BOX 141 IRVONA, PA 16056</u></p>	
		<p>COMPLETE THIS SECTION ON DELIVERY</p> <p>A. Signature <input checked="" type="checkbox"/> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery <input type="checkbox"/></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: <input type="checkbox"/></p>	
<p>2. Article Number <i>(Transfer from service)</i></p> <p><u>7006 3450 0001 0175 5187</u></p>		<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

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

PS Form 3800, August 2000 (Reverse) PSN 7530-02-000-9047

Certified Mail Provides:

- A mailing receipt for your mailpiece
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years
- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED WITH CERTIFIED MAIL.
- Certified Mail provides Return Receipt Service for Priority Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt Service, please complete postage to cover the fee. Endorsements on mailpieces Return Receipt Requested. To receive a fee waiver for delivery, attach PS Form 3811 to the article and attach a Return Receipt (PS Form 3811) to the article. Please complete postage to cover the fee required.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt Service, please complete postage to cover the fee. Endorsements on mailpieces Return Receipt Requested. To receive a fee waiver for delivery, attach PS Form 3811 to the article and attach a Return Receipt (PS Form 3811) to the article. Please complete postage to cover the fee required.
- If a postmark is not needed, detach and affix postmark. If a postmark is desired, please present the article to the addressee or endorsee.
- If a postmark is not needed, attach and affix postmark and add a label with postmark and mail recipient on the Certified Mail receipt. If a postmark is desired, please present the article to the addressee or endorsee.
- If a postmark is not needed, attach and affix postmark and add a label with postmark and mail recipient on the Certified Mail receipt. If a postmark is desired, please present the article to the addressee or endorsee.
- If a postmark is not needed, attach and affix postmark and add a label with postmark and mail recipient on the Certified Mail receipt. If a postmark is desired, please present the article to the addressee or endorsee.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION
THE CIT GROUP / CONSUMER FINANCE, INC. Plaintiff *
vs. * NO. 06-1571-CD
JOHN CALVIN SUHONEY, JR., *
ROBIN LYNN SUHONEY, *
Defendants *

ORDER

NOW, this 11th day of January, 2007, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon the Defendants **John Calvin Suhoney, Jr.** and **Robin Lynn Suhoney**, by :

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to RR 1, Box 141, Irvona, PA 16656;
3. By certified mail, return receipt requested, to RR 1, Box 141, Irvona, PA 16656; and
4. By posting the mortgaged premises known in this herein action as RR1, Box 141, (Chest Township) Irvona, PA 16656.

Service of the aforementioned publication and mailings is effective upon the date of publication and mailing and is to be done by Plaintiff's attorney, who will file Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,

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

/s/ Fredric J. Ammerman

FREDRIC J. AMMERMAN
President Judge

JAN 11 2007

Attest,

William L. Hause
Prothonotary/
Clerk of Courts

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

The CIT Group/ Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

v.
John Calvin Suhoney, Jr.
Robin Lynn Suhoney
RR1 Box 141
Irvona, PA 16656
Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1571-CD

PRAECIPE TO FILE PROOF OF PUBLICATION

TO THE PROTHONOTARY:

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

DATE: August 6, 2007

UDREN LAW OFFICES, P.C.

BY

Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

FILED

AUG 20 2007

2007

William A. Shaw
Prothonotary/Clerk of Courts

NOTICE OF ACTION IN
MORTGAGE FORECLOSURE
IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW
NO. 06-1571-CD

The CIT Group/ Consumer Finance, Inc., 715 South Metropolitan Avenue, Suite 150, Oklahoma City, OK 73108, Plaintiff v. John Calvin Suhoney, Jr. and Robin Lynn Suhoney, RR 1, Box 141, Irvona, PA 16656, Defendant(s)

NOTICE OF SALE OF REAL PROPERTY

To: John Calvin Suhoney, Jr., Robin Lynn Suhoney, RR 1, Box 141, Irvona, PA 16656.

Your house (real estate) at RR 1, Box 141, (Chest Township) Irvona, PA 16656 is scheduled to be sold at the Sheriff's Sale on August, 3, 2007 at 10:00 A.M. in the Clearfield County Courthouse, 1 North Second Street, Suite 116, Clearfield, PA 16830, to enforce the court judgment of \$65,281.42, obtained by Plaintiff above (the mortgagee) against you. If the sale is postponed, the property will be relisted for the Next Available Sale.

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

BEGINNING at an iron pin (found) at the Southeastern Right-of-Way of Township road No. T-417 having a 33 foot wide Roadway and at corner of former grantor, thence by name South 29 degrees 43 minutes 40 seconds East a distance of 116.13 feet to an iron pipe (found); thence South 34 degrees 54 minutes 23 seconds West a distance of 200.49 feet to an iron pipe (found); thence North 66 degrees 49 minutes 46 seconds West a distance of 226.22 feet to an iron pipe (set) on the Southeastern Right-of-Way of Township Road No. T-417; thence by said Right-of-Way North 54 degrees 58 minutes 58 seconds East a distance of 245.23 feet to a point within the said Township Road; thence along said Township Road North 61 degrees 06 minutes .28 seconds East a distance of 73.45 feet to an iron pin, the place of beginning. Containing 0.95522 acres by calculation and more particularly shown on plan of Survey by Fred H. Shuss, P.E., dated December 7, 1994 and attached to prior deed of record.

SUBJECT, HOWEVER, to all restrictions, exceptions, reservations, easements and conditions as contained in Prior deeds of conveyance, Property known as: RR 1, Box 141, Irvona, PA 16656 a/k/a 624 Frailey Road.

Tax ID #: 109-G16-000-00029 (Control No. 1090-51344)

BEING KNOWN AS: RR 1, BOX 141 (CHEST TOWNSHIP) IRVONA, PA 16656.

PROPERTY ID NO.: 109-G16-000-00029, CONTROL NO. 1090-51344

TITLE TO SAID PREMISES IS
VESTED IN JOHN CALVIN SUHONEY, JR.
AND ROBIN LYNN SUHONEY, HUSBAND
AND WIFE BY DEED FROM KEVIN J.
MICHAELS AND VALERIE A. MILLER
NOW VALERIE A. MICHAELS, HUSBAND
AND WIFE DATED 1/12/01 RECORDED
1/24/01 IN INSTRUMENT NO. 200100945.

MARK J. UDREN, ATTORNEY FOR
PLAINTIFF, MARK J. UDREN &
ASSOCIATES, WOODCREST CORP-
ORATE CENTER, 111 WOODCREST
ROAD, SUITE 200, CHERRY HILL, NJ
08003-3620, 856-669-5400.

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA : :

COUNTY OF CLEARFIELD : :

On this 13th day of July AD 2007, 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 July 13, 2007, Vol. 19, No. 28. 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.

Sharon J. Pusey
Notary Public
My Commission Expires

NOTARIAL SEAL
SHARON J. PUSEY, Notary Public
Hontzdale, Clearfield County, PA
My Commission Expires, April 7, 2011

William J Mansfield, Inc
Legal Advertising Agency
The Woods Suite 1209
998 Old Eagle School Rd
Wayne PA 19087-1805

NOTICE OF ACTION
IN MORTGAGE FORECLOSURE
IN THE COURT
OF COMMON PLEAS
CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION-LAW
NO. 06-1571-CD
The CIT Group/Consumer

Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108,
Plaintiff
v.
John Calvin Suhoney, Jr.
and Robin Lynn Suhoney
RR 1 Box 141
Iriona, PA 16656,
Defendant(s)

NOTICE OF SALE
OF REAL PROPERTY

To:
John Calvin Suhoney, Jr.
and Robin Lynn Suhoney
RR 1 Box 141
Iriona, PA 16656
Your house (real estate) at RR 1
Box 141 (Chest Township) Iriona,
PA 16656 is scheduled to be sold
at the Sheriff's Sale on August 3,
2007 at 10:00 A.M. in the 1 North
Second Street, Suite 116 Clear-
field, PA 16830, to enforce the
court judgment of 65,281.42, ob-
tained by Plaintiff above (the mort-
gagor) against you. If the sale is
postponed, the property will be re-
listed for the Next Available Sale.

PROPERTY DESCRIPTION:
ALL that certain piece or parcel of
land situate in the Township of
Chest, County of Clearfield and
Commonwealth of Pennsylvania,
as follows,
to-wit:

BEGINNING at an iron pin (found)
at the Southeastern Right-of-Way
of Township Road No. T-417 hav-
ing a 33 foot wide Roadway and at
corner of former grantor; thence by
same South 29 degrees 43 min-
utes 40 seconds East a distance of
116.3 feet to an iron pipe (found);
thence South 34 degrees 54 min-
utes 23 seconds West a distance of
200.49 feet to an iron pipe
(found); thence North 66 degrees
49 minutes 46 seconds West a dis-
tance of 226.22 feet to an iron pipe
(set) on the Southeastern Right-of-
Way of Township Road No. T-417;
thence by said Right-of-Way North
54 degrees 58 minutes 08 sec-
onds East a distance of 245.23
feet to a point within the said Town-
ship Road; thence along said Town-
ship Road North 61 degrees 06
minutes 28 seconds East a dis-
tance of 73.45 feet to an iron pin,
the place of beginning. Containing
0.95522 acres by calculation and
more particularly shown on plan of
Survey by Fred H. Shuss, P.E., da-
ted December 7, 1994 and at-
tached to prior deed of record.

SUBJECT, HOWEVER, to all re-
strictions, exceptions, reservations,
easements and conditions as
contained in prior deeds of convey-
ance.

Property known as: RR 1 Box
141, Iriona, PA 16656, a/k/a 624
Frailey Road.
TaxID#: 109-G16-000-00029
(Control #1090-51344)

BEING KNOWN AS:
RR 1 BOX 141
(CHEST TOWNSHIP)
IRVONA, PA 16656
PROPERTY ID
NO.: 109-G16-000-00029
CONTROL NO.: 1090-51344
TITLE TO SAID PREMISES IS
VESTED IN JOHN CALVIN SUHONEY,
JR. AND ROBIN LYNN SUHONEY,
HUSBAND AND WIFE BY
DEED FROM KEVIN J. MICHAELS
AND VALERIE A. MILLER NOW
VALERIE A. MICHAELS, HUS-
BAND AND WIFE DATED 1/12/01
RECORDED 1/24/01 IN INSTRU-
MENT NO. 200100945.

MARK J. UDREN
ATTORNEY FOR PLAINTIFF
MARK J. UDREN
& ASSOCIATES
WOODCREST
CORPORATE CENTER
111 WOODCREST ROAD,
SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

COUNTY OF CLEARFIELD : SS:

On this 9th day of July, A.D. 2007,
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 July 3, 2007

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 COMMONWEALTH OF PENNSYLVANIA

Notary Public

Clearfield, Pa.

Notarial Seal

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

Member, Pennsylvania Association Of Notaries

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20584
NO: 06-1571-CD

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE, INC.
VS.
DEFENDANT: JOHN CALVIN SUHONEY, JR. AND ROBIN LYNN SUHONEY

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 5/1/2007

LEVY TAKEN 5/18/2007 @ 11:00 AM

POSTED 5/18/2007 @ 11:00 AM

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 1/8/2008

DATE DEED FILED NOT SOLD

DETAILS

6/14/2007 @ SERVED JOHN CALVIN SUHONEY, JR.

SERVED JOHN CALVIN SUHONEY, JR., DEFENDANT BY REG & CERT MAIL PER COURT ORDER TO 624 FRAILEY ROAD, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA. CERT #70060810000145072377 CERT MAIL RETURNED UNCLAIMED 7/3/07.

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

6/14/2007 @ SERVED ROBIN LYNN SUHONEY

SERVED ROBIN LYNN SUHONEY, DEFENDANT, BY REG & CERT MAIL PER COURT ORDER TO 624 FRAILEY ROAD, IRVONA, CLEARFIELD COUNTY, PENNSYLVANIA. CERT #70060810000145072476. CERT MAIL RETURNED UNCLAIMED 7/3/07.

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

@ SERVED

NOW, AUGUST 2, 2007 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO CONTINUE THE SHERIFF SALE SCHEDULED FOR AUGUST 3, 2007 TO SEPTEMBER 7, 2007.

@ SERVED

NOW, AUGUST 30, 2007 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO STAY THE SHERIFF SALE SCHEDULED FOR SEPTEMBER 7, 2007. THE LOAN IS BEING CHARGED OFF.

FILED
01/14/08
JAN 08 2008
LS

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20584
NO: 06-1571-CD

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE, INC.

VS.

DEFENDANT: JOHN CALVIN SUHONEY, JR. AND ROBIN LYNN SUHONEY

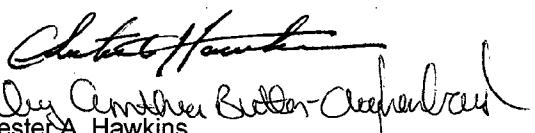
Execution REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS \$229.23

SURCHARGE \$40.00 PAID BY ATTORNEY

So Answers,


by Another Bitter-Clephant
Chester A. Hawkins
Sheriff

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

ATTORNEY FOR PLAINTIFF

The CIT Group/ Consumer
Finance, Inc.
Plaintiff

v.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 06-1571-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

To satisfy the judgment, interest and costs in the above matter,
you are directed to levy upon and sell the following described
property: RR1 Box 141
(Chest Township)
Irsvona, PA 16656
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$65,281.42

Interest From 4/28/07
to Date of Sale _____
Ongoing Per Diem of \$28.16
to actual date of sale including if sale is
held at a later date

(Costs to be added) \$ 132.00 Prothonotary costs

By Willie A. Hawkins
Clerk

Date 5/1/07

Received May 1, 2007 @ 3:00 PM.
Chester A. Hawkins
by Amitha Bitter Aughenbaugh

COURT OF COMMON PLEAS
NO. 06-1571-CD

=====

The CIT Group/ Consumer Finance, Inc.

vs.

John Calvin Suhoney, Jr.
Robin Lynn Suhoney

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 65,281.42

INTEREST \$ _____

from 4/28/07

to Date of Sale _____

Ongoing Per Diem of \$28.16

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

COSTS PAID:

PROTHY \$ 132.00

SHERIFF \$ _____

STATUTORY \$ _____

COSTS DUE PROTHY. \$ _____

PREMISES TO BE SOLD:

RR1 Box 141

(Chest Township)

Irvington, PA 16656

Mark J. Udren, ESQUIRE

UDREN LAW OFFICES, P.C.

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

(856) 669-5400

pleadings@udren.com

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

BEGINNING at an iron pin (found) at the Southeastern Right-of-Way of Township Road No. T-417 having a 33 foot wide Roadway and at corner of former grantor; thence by name South 29 degrees 43 minutes 40 seconds East a distance of 116.13 feet to an iron pipe (found); thence South 34 degrees 54 minutes 23 seconds West a distance of 200.49 feet to an iron pipe (found); thence North 66 degrees 49 minutes 46 seconds West a distance of 226.22 feet to an iron pipe (set) on the Southeastern Right-of-Way of Township Road No. T-417; thence by said Right-of-Way North 54 degrees 58 minutes 08 seconds East a distance of 245.23 feet to a point within the said Township Road; thence along said Township Road North 61 degrees 06 minutes 28 seconds East a distance of 73.45 feet to an iron pin, the place of beginning. Containing 0.95522 acres by calculation and more particularly shown on plan of Survey by Fred H. Shuss, P.E., dated December 7, 1994 and attached to prior deed of record.

SUBJECT, HOWEVER, to all restrictions, exceptions, reservations, easements and conditions as contained in prior deeds of conveyance.

Property known as: RR 1 Box 141, Irvona, PA 16656 a/k/a 624 Frailey Road.

Tax ID #: 109-G16-000-00029 (Control #1090-51344)

BEING KNOWN AS: RR1 BOX 141
(CHEST TOWNSHIP)
IRVONA, PA 16656

PROPERTY ID NO.: 109-G16-000-00029 CONTROL NO.: 1090-51344

TITLE TO SAID PREMISES IS VESTED IN JOHN CALVIN SUHONEY, JR. AND ROBIN LYNN SUHONEY, HUSBAND AND WIFE BY DEED FROM KEVIN J. MICHAELS AND VALERIE A. MILLER NOW VALERIE A. MICHAELS, HUSBAND AND WIFE DATED 1/12/01 RECORDED 1/24/01 IN INSTRUMENT NO. 200100945.

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME JOHN CALVIN SUHONEY, JR. NO. 06-1571-CD

NOW, January 08, 2008, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on , I exposed the within described real estate of John Calvin Suhoney, Jr. And Robin Lynn Suhoney to public venue or outcry at which time and place I sold the same to he/she being the highest bidder, for the sum of and made the following appropriations, viz:

SHERIFF COSTS:

PLAINTIFF COSTS, DEBT AND INTEREST:

RDR	15.00	DEBT-AMOUNT DUE	65,281.42
SERVICE	15.00	INTEREST @ 28.1600	0.00
MILEAGE		FROM TO	
LEVY	15.00		
MILEAGE	26.19	PROTH SATISFACTION	
POSTING	15.00	LATE CHARGES AND FEES	
CSDS	10.00	COST OF SUIT-TO BE ADDED	
COMMISSION	0.00	FORECLOSURE FEES	
POSTAGE	18.04	ATTORNEY COMMISSION	
HANDBILLS	15.00	REFUND OF ADVANCE	
DISTRIBUTION	25.00	REFUND OF SURCHARGE	40.00
ADVERTISING	15.00	SATISFACTION FEE	
ADD'L SERVICE	15.00	ESCROW DEFICIENCY	
DEED		PROPERTY INSPECTIONS	
ADD'L POSTING		INTEREST	
ADD'L MILEAGE		MISCELLANEOUS	
ADD'L LEVY			
BID/SETTLEMENT AMOUNT		TOTAL DEBT AND INTEREST	\$65,321.42
RETURNS/DEPUTIZE			
COPIES	15.00	COSTS:	
	5.00	ADVERTISING	437.38
BILLING/PHONE/FAX	5.00	TAXES - COLLECTOR	
CONTINUED SALES	20.00	TAXES - TAX CLAIM	
MISCELLANEOUS		DUE	
TOTAL SHERIFF COSTS	\$229.23	LIEN SEARCH	100.00
		ACKNOWLEDGEMENT	
DEED COSTS:		DEED COSTS	0.00
ACKNOWLEDGEMENT		SHERIFF COSTS	229.23
REGISTER & RECORDER		LEGAL JOURNAL COSTS	162.00
TRANSFER TAX 2%	0.00	PROTHONOTARY	132.00
TOTAL DEED COSTS	\$0.00	MORTGAGE SEARCH	40.00
		MUNICIPAL LIEN	
		TOTAL COSTS	\$1,100.61

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

COPY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION
THE CIT GROUP / CONSUMER FINANCE, INC. Plaintiff
vs.
JOHN CALVIN SUHONEY, JR.,
ROBIN LYNN SUHONEY,
Defendants

* NO. 06-1571-CD

O R D E R

NOW, this 11th day of January, 2007, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon the Defendants **John Calvin Suhoney, Jr.** and **Robin Lynn Suhoney**, by :

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to RR 1, Box 141, Irvona, PA 16656;
3. By certified mail, return receipt requested, to RR 1, Box 141, Irvona, PA 16656; and
4. By posting the mortgaged premises known in this herein action as RR1, Box 141, (Chest Township) Irvona, PA 16656.

Service of the aforementioned publication and mailings is effective upon the date of publication and mailing and is to be done by Plaintiff's attorney, who will file Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,

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

/s/ Fredric J. Ammerman

FREDRIC J. AMMERMAN
President Judge

JAN 11 2007

Attest.

William L. Ammerman
Prothonotary/
Clerk of Courts



0168416505405
\$ 05.380
06/14/2007
Mailed From 16830
US POSTAGE

7006 0810 0001 4507 2476

UNCLAIMED

ROBIN LYNN SUHONEY
624 FRAILEY ROAD
IRVONA, PA 16830

6-18
Q-23
7-3



UNCLAIMED

168300002748

U.S. Postal Service CERTIFIED MAIL™ RECEIPT	
<i>(Domestic mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com ®	
OFFICIAL USE	
Postage	\$ 0000
Certified Fee	0000
Return Receipt Fee (Endorsement Required)	0000
Restricted Delivery Fee (Endorsement Required)	0000
Total Postage & Fees	\$ 538
Send To	ROBIN LYNN SUHONEY 624 FRAILEY ROAD IRVONA PA 16830
Street, Apt. No., or PO Box No. City, State, ZIP 4	

9742 4507 2476 7006

14 JUN 2007 CLEAFIELD PA 16830-0001

PS Form 3800, June 2002
See Reverse for Instructions

COMPLETE THIS SECTION			
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p>			
<p>1. Article Addressed to:</p> <p>ROBIN LYNN SUHONEY 624 FRAILY ROAD</p>			
<p>2. Signature</p> <p>X</p>			
<p>A. Signature</p> <p><input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>			
<p>B. Received by (Printed Name)</p>		<p>C. Date of Delivery <i>1/4/01</i></p>	
<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If YES, enter delivery address below:</p>			
<p>3. Service Type</p> <p><input type="checkbox"/> Air Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D. <input type="checkbox"/> ? (Extra Fee) <input checked="" type="checkbox"/> Yes</p>			
<p>RECORDED TO SENDER</p> <p>UNCLAIMED</p>			
<p>4507 2476</p>			
<p>102895-02-N-1540</p>			

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.

ROBIN LYNN SUHONEY
624 FRAILEY ROAD

1. Article Addressed to:

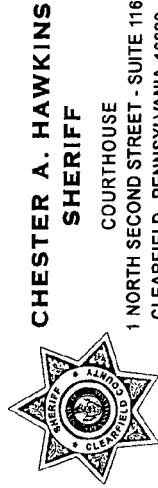
RETURNED
TO SENDER

UNCLAIMED

ט' ט

२८४

PSI Form 3011.1



01646505405
\$05.380
06/14/2007
Mailed From 16830
US POSTAGE

7006 0810 0001 4507 2377

UNCLAIMED

JOHN CALVIN SUHONEY, JR.
624 FRAILEY ROAD
IRVONA, PA 16656

60-18
60-13
1-3

165 4E 1 25-07-05-07
RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
BC : 16830247201 *0596-08029-16-27
1 52055822849
1000 0000 0000 0000

CDW

165 4E 1 25-07-05-07
RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD
BC : 16830247201 *0596-08029-16-27
1 52055822849
1000 0000 0000 0000

US Postal Service™ CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$ 0.00
Certified Fee	\$ 0.00
Return Receipt Fee (Endorsement Required)	\$ 0.00
Restricted Delivery Fee (Endorsement Required)	\$ 0.00
Total Postage & Fees	\$ 0.00

Postmark
CLEARFIELD
PA
14 JUN 2007

Send To
Street, Apt. No.: JOHN CALVIN SUHONEY, JR.
or PO Box No. 624 FRAILEY ROAD
City, State, ZIP+4 Irvona, PA 16656

PS Form 3800, June 2002
See Reverse for Instructions

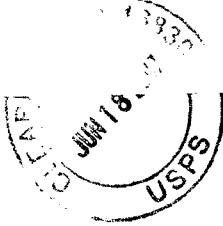
SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

JOHN CALVIN SUHONEY, JR.
624 FRALEY ROAD
IRVONA, PA 16656

COMPLETE THIS SECTION ON DELIVERY			
A. Signature			
<input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee			
B. Received by (Printed Name)			
C. Date of Delivery			
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No			
1. Article Addressed to:			
2. Article Number (Transfer from service label)			
3. Service Type			
<input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail			
<input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise			
<input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.			
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes			
5			
PS Form 3811, February 2004 / / / / / Domestic Return Receipt			
102595-02-M-1540			



UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620
856. 669. 5400
FAX: 856. 669. 5399

PENNSYLVANIA OFFICE
713-568-9500

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

**FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL**

PLEASE RESPOND TO NEW JERSEY OFFICE

August 1, 2007

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

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

Re: The CIT Group/ Consumer Finance, Inc.

vs.

John Calvin Suhoney, Jr. & Robin Lynn Suhoney
Clearfield County C.C.P. No. 06-1571-CD
Premises: RR1 Box 141 (Chest Township) Irvona, PA 16656
SS Date: August 3, 2007

Dear Cindy:

Please postpone the Sheriff's Sale scheduled for August 3, 2007 to
September 7, 2007.

Sale is postponed for the following reason:

To allow time for notice of sale to be published.

Thank you for your attention to this matter.

Sincerely yours,

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

/alc

UDREN LAW OFFICES, P.C.

WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620

856. 669. 5400

FAX: 856. 669. 5399

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

PENNSYLVANIA OFFICE
215-368-9500

**FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL**

PLEASE RESPOND TO NEW JERSEY OFFICE

August 30, 2007

Sent via telefax #814-765-5915

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

Re: The CIT Group/ Consumer Finance, Inc.
vs.
John Calvin Suhoney, Jr.
Robin Lynn Suhoney
Clearfield County C.C.P. No. 06-1571-CD
Premises: RR1 Box 141 (Chest Township) Irvona, PA 16656
SS Date: September 7, 2007

Dear Cinday:

Please STAY the Sheriff's Sale scheduled for September 7, 2007.

Sale is Stayed for the following reason:

Loan is being charged off. No monies collected.

Thank you for your attention to this matter.

Sincerely yours,

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

/kap