

06-1697-CD  
Citifinancial Ser. Vs Helen I. Goodrow

2006-1697-CD  
Citifinancial Services vs Helen Goodrow

**GOLDBECK McCAFFERTY & MCKEEVER**  
**BY: JOSEPH A. GOLDBECK, JR.**  
**ATTORNEY I.D. #16132**  
**SUITE 5000 MELLON INDEPENDENCE CENTER**  
**701 Market Street**  
**PHILADELPHIA, PA 19106**  
**(215) 627-1322**  
**ATTORNEY FOR PLAINTIFF**

CITIFINANCIAL SERVICES INC.  
1111 Northpoint Drive  
Building 4 Suite 100  
Coppel, TX 75019

Plaintiff

vs.

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

Defendants

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF EJECTMENT

Term

No. 2006-1697-CO

CIVIL ACTION: EJECTMENT

**NOTICE**

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

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

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

**AVISO**

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

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

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATEAMENTE.

SI NO CONOCE A UN ABOGADO, LLAME AL "LAWYER REFERENCE SERVICE" (SERVICIO DE REFERENCIA DE ABOGADOS), (215) 238-6300.

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

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

**FILED**

OCT 16 2006

W(11:15)w

William A. Shaw  
Prothonotary/Clerk of Courts

2 cent to Step

1 cent to ~~ATTY~~  
ATTY

COMPLAINT IN EJECTMENT

1. Plaintiff is CITIFINANCIAL SERVICES INC., 1111 Northpoint Drive, Building 4 Suite 100, Coppel, TX 75019.
2. Defendants are HELEN I. GOODROW, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises 1629 Dockweller Road f/k/a RR 1 Box 487, Woodland, PA 16881 a legal description of which is attached. ("Property")
4. Plaintiff became the equitable owner of the Property as a result of foreclosure and judicial sale by the Sheriff of Clearfield County. The sheriff's sale of the property was held on October 06, 2006.
5. Plaintiff, by virtue of the its purchase of the property, is the equitable owner of said Property and is entitled to immediate possession thereof. The Defendants, HELEN I. GOODROW and OCCUPANTS, are occupying the Property without right, and so far as the Plaintiff is informed, without claim of title.
6. Plaintiff has demanded possession of the Property from the said Defendants, who have refused to deliver up possession of the same.

WHEREFORE, Plaintiff requests judgment for possession of the Property.

GOLDBECK McCAFFERTY & McKEEVER

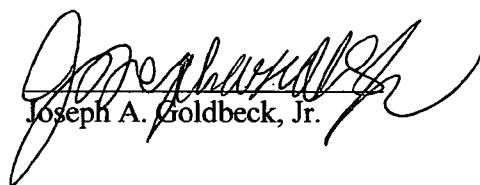


By: Joseph A. Goldbeck, Jr., Esq.

VERIFICATION

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

Date: 10/13/06



Joseph A. Goldbeck, Jr.

#2000510246808 - HELEN I. GOODROW

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

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

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

Tax parcel no: 106-n07-000-00060

**GOLDBECK McCAFFERTY & MCKEEVER**  
A Professional Corporation  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532  
[www.goldbecklaw.com](http://www.goldbecklaw.com)

November 14, 2006

**PROTHONOTARY OF CLEARFIELD COUNTY**

William Shaw  
Prothonotary of Clearfield County  
230 E. Market Street  
Clearfield, PA 16830

RE: Docket Number: Term; No.: 2006-1697-CP

To the Prothonotary:

Kindly file of record the enclosed Praecipe to Discontinue and End.

A time stamped copy does **not** need to be returned to our office.

**Goldbeck McCafferty & McKeever**  
Barbara Roach  
Manager – Eviction Dept.  
215-825-6319 (direct phone)  
215-825-6419 (Eviction Dept. Fax)  
[broach@goldbecklaw.com](mailto:broach@goldbecklaw.com) (email)  
215-627-1322 – Main Number

OK

Enclosures

cc:

**GOLDBECK McCAFFERTY & MCKEEVER**

BY: Joseph A. Goldbeck, Jr.

Attorney I.D. #16132

Suite 5000 – Mellon Independence Center

701 Market Street

Philadelphia, PA 19106-1532

215-825-6319

Attorney for Plaintiff

---

CITIFINANCIAL SERVICES INC.

1111 Northpoint Drive

Building 4 Suite 100

Coppel, TX 75019

Plaintiff

vs.

HELEN I. GOODROW

and OCCUPANTS

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

Woodland, PA 16881

IN THE COURT OF COMMON PLEAS

of Clearfield County

No. 2006-1697-CP

**PRAECIPE TO DISCONTINUE AND END**

TO THE PROTHONOTARY:

Kindly mark the above case Discontinued and Ended upon payment of your costs only.



JOSEPH A. GOLDBECK, JR., ESQUIRE

**FILED**

NOV 17 2006

W/2:00/w

William A. Shaw

Prothonotary/Clerk of Courts

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

Service # 1 of 2 Services

Sheriff Docket # **102042**

CITIFINANCIAL SERVICES INC

Case # **06-1697-CD**

vs.

**HELEN I. GOODROW and OCCUPANTS**

TYPE OF SERVICE COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

NOW January 31, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO HELEN I. GOODROW, DEFENDANT. SEVERAL ATTEMPTS, NOT HOME.

SERVED BY: /

**FILED**  
01/31/2007  
JAN 31 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 #

**102042**

CITIFINANCIAL SERVICES INC

Case # 06-1697-CD

vs.

HELEN I. GOODROW and OCCUPANTS

TYPE OF SERVICE COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

NOW January 31, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO OCCUPANT, DEFENDANT. SEVERAL ATTEMPTS, NOT HOME.

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102042  
NO: 06-1697-CD  
SERVICES 2  
COMPLAINT IN EJECTMENT

PLAINTIFF: CITIFINANCIAL SERVICES INC  
vs.  
DEFENDANT: HELEN I. GOODROW and OCCUPANTS

**SHERIFF RETURN**

---

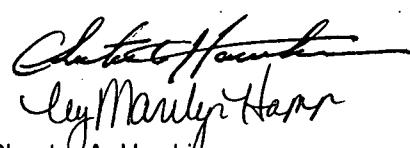
**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	273078	20.00
SHERIFF HAWKINS	GOLDBECK	273078	46.09

Sworn to Before Me This

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

So Answers,

  
Chester A. Hawkins  
Sheriff

**GOLDBECK McCAFFERTY & MCKEEVER  
BY: JOSEPH A. GOLDBECK, JR.  
ATTORNEY I.D. #16132  
SUITE 5000 MELLON INDEPENDENCE CENTER  
701 Market Street  
PHILADELPHIA, PA 19106  
(215) 627-1322  
ATTORNEY FOR PLAINTIFF**

CITIFINANCIAL SERVICES INC.  
1111 Northpoint Drive  
Building 4 Suite 100  
Coppel, TX 75019

Plaintiff

vs.

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

Defendants

**I HEREBY CERTIFY THAT THIS  
IS A TRUE AND CORRECT COPY  
OF THE ORIGINAL FILED**

**IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY**

**CIVIL ACTION - LAW**

**ACTION OF EJECTMENT**

Term

No. 2006-1697-CO

**CIVIL ACTION: EJECTMENT**

**NOTICE**

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

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

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

**AVISO**

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

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

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATEAMENTE.

SI NO CONOCE A UN ABOGADO, LLAME AL "LAWYER REFERENCE SERVICE" (SERVICIO DE REFERENCIA DE ABOGADOS), (215) 238-6300.

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

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

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

OCT 16 2006

Attest.

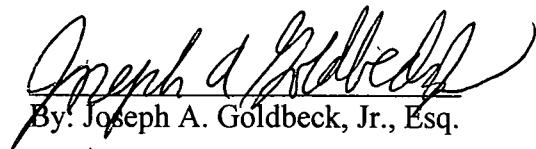
*William L. Ober*  
Prothonotary/  
Clerk of Courts

COMPLAINT IN EJECTMENT

1. Plaintiff is CITIFINANCIAL SERVICES INC., 1111 Northpoint Drive, Building 4 Suite 100, Coppell, TX 75019.
2. Defendants are HELEN I. GOODROW, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises 1629 Dockweller Road f/k/a RR 1 Box 487, Woodland, PA 16881 a legal description of which is attached. ("Property")
4. Plaintiff became the equitable owner of the Property as a result of foreclosure and judicial sale by the Sheriff of Clearfield County. The sheriff's sale of the property was held on October 06, 2006.
5. Plaintiff, by virtue of the its purchase of the property, is the equitable owner of said Property and is entitled to immediate possession thereof. The Defendants, HELEN I. GOODROW and OCCUPANTS, are occupying the Property without right, and so far as the Plaintiff is informed, without claim of title.
6. Plaintiff has demanded possession of the Property from the said Defendants, who have refused to deliver up possession of the same.

WHEREFORE, Plaintiff requests judgment for possession of the Property.

GOLDBECK McCAFFERTY & McKEEVER

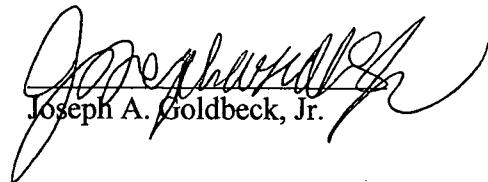


By: Joseph A. Goldbeck, Jr., Esq.

VERIFICATION

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

Date: 10/13/06



Joseph A. Goldbeck, Jr.

#2000510246808 - HELEN I. GOODROW

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

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

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

Tax parcel no: 106-n07-000-00060

**GOLDBECK McCAFFERTY & McKEEVER**  
**BY: JOSEPH A. GOLDBECK, JR.**  
**ATTORNEY I.D. #16132**  
**SUITE 5000 MELLON INDEPENDENCE CENTER**  
**701 Market Street**  
**PHILADELPHIA, PA 19106**  
**(215) 627-1322**  
**ATTORNEY FOR PLAINTIFF**

**I HEREBY CERTIFY THAT THIS  
IS A TRUE AND CORRECT COPY  
OF THE ORIGINAL FILED**

**CITIFINANCIAL SERVICES INC.**  
1111 Northpoint Drive  
Building 4 Suite 100  
Coppel, TX 75019

**Plaintiff**

**vs.**

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

**Defendants**

**IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY**

**CIVIL ACTION - LAW**

**ACTION OF EJECTMENT**

**Term**

**No. 2006-1697-CV**

**CIVIL ACTION: EJECTMENT**

**NOTICE**

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

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

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

**A V I S O**

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

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

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATEAMENTE.

SI NO CONOCE A UN ABOGADO, LLAME AL "LAWYER REFERENCE SERVICE" (SERVICIO DE REFERENCIA DE ABOGADOS), (215) 238-6300.

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

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

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

**OCT 16 2006**

**Attest.**

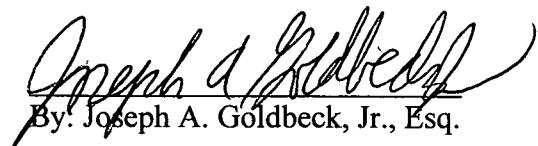
*William J. Linn*  
Prothonotary/  
Clerk of Courts

COMPLAINT IN EJECTMENT

1. Plaintiff is CITIFINANCIAL SERVICES INC., 1111 Northpoint Drive, Building 4 Suite 100, Coppell, TX 75019.
2. Defendants are HELEN I. GOODROW, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises 1629 Dockweller Road f/k/a RR 1 Box 487, Woodland, PA 16881 a legal description of which is attached. ("Property")
4. Plaintiff became the equitable owner of the Property as a result of foreclosure and judicial sale by the Sheriff of Clearfield County. The sheriff's sale of the property was held on October 06, 2006.
5. Plaintiff, by virtue of the its purchase of the property, is the equitable owner of said Property and is entitled to immediate possession thereof. The Defendants, HELEN I. GOODROW and OCCUPANTS, are occupying the Property without right, and so far as the Plaintiff is informed, without claim of title.
6. Plaintiff has demanded possession of the Property from the said Defendants, who have refused to deliver up possession of the same.

WHEREFORE, Plaintiff requests judgment for possession of the Property.

GOLDBECK McCAFFERTY & McKEEVER

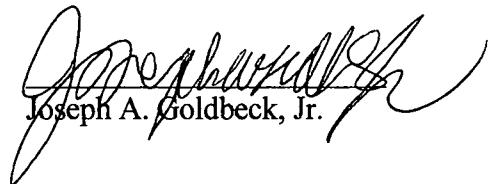


By: Joseph A. Goldbeck, Jr., Esq.

VERIFICATION

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

Date: 10/13/06



Joseph A. Goldbeck, Jr.

#2000510246808 - HELEN I. GOODROW

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

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

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

Tax parcel no: 106-n07-000-00060