

06-1936-CD

Deutsche Bank et al vs Gloria Kachman et al

2006-1936-CD

Deutsche Bank et al vs Gloria Kachman et al

**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**

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE OF ARGENT  
MORTGAGE SECURITIES, INC. ASSET-  
BACKED PASS THROUGH CERTIFICATES  
SERIES 2004-W11, UNDER THE POOLING  
AND SERVICING AGREEMENT DATED AS  
OF OCTOBER 1, 2004, WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
JOSEPH KACHMAN  
and OCCUPANTS  
416 Arnold Avenue  
Clearfield, PA 16830

Defendants

**FILED** Atty pd. 85.00  
M 11/04/06  
NOV 20 2006 3CC Staff  
S

William A. Shaw  
Prothonotary/Clerk of Courts

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

Term  
No. 06-1936-CD

**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 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.

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*JAN. 12, 2007* Document

Reinstated/Reissued to Sheriff/Attorney  
for service.

*W.A. Shaw*  
Deputy Prothonotary

3-27-2007 DOCUMENT  
Reinstated/Reissued to Sheriff/Attorney  
for service.

*W.A. Shaw*  
Deputy Prothonotary

COMPLAINT IN EJECTMENT

1. Plaintiff is DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE, 505 City Parkway West, Suite 100, Orange, CA 92868.
2. Defendants are GLORIA KACHMAN, JOSEPH KACHMAN, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises 416 Arnold Avenue ; Clearfield, PA 16830 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 November 03, 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, GLORIA KACHMAN, JOSEPH KACHMAN 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: 11/17/06



A handwritten signature in black ink, appearing to read "Joseph A. Goldbeck, Jr." The signature is fluid and cursive, with "Joseph" and "Goldbeck" being more distinct and "A." and "Jr." being smaller.

#0061717757 - GLORIA KACHMAN and JOSEPH KACHMAN

All that certain piece or parcel of land located in the Second Ward, Clearfield Borough, Clearfield County, Pennsylvania, bounded and described as follows:

Beginning at an iron pipe on the west side of a 16 foot alley, said iron pipe being north 36 degrees 00 minutes west 81.5 feet from the northwest corner of the intersection of South Fifth Street and said 16 foot alley and said iron pipe being the southeast corner of the lot herein described; thence along the line of said 16 foot alley north 36 degrees 00 minutes west 81.5 feet to an iron pipe; thence through land of prior grantor south 54 degrees 00 minutes west 75.2 feet to an iron pipe; thence 83.2 feet to an iron pipe; thence through land of prior grantor north 54 degrees 00 minutes east 92.6 feet to an iron pipe and place of beginning.

TAX PARCEL #: 4.2K08-228-00049

PROPERTY ADDRESS: 416 Arnold Avenue Rear a/k/a 416 Clarion Street, Clearfield, PA 16830

**GOLDBECK McCAFFERTY & MCKEEVER**

BY: JOSEPH A. GOLDBECK, JR.

ATTORNEY I.D. #16132

SUITE 5000 – MELLON INDEPENDENCE CENTER

701 MARKET STREET

PHILADELPHIA, PA 19106-1532

(215) 627-1322

ATTORNEY FOR PLAINTIFF

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COMPANY, AS TRUSTEE OF ARGENT  
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505 City Parkway West  
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Plaintiff

vs.

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JOSEPH KACHMAN  
& OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

Defendant(s)

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

CIVIL ACTION - LAW

EJECTMENT COMPLAINT

Term  
No. 06-1936 cd

**FILED**

**JAN 12 2007**

W 12-301 W  
William A. Shaw  
Prothonotary/Clerk of Courts

1 CERT TO MTR

3 REINSTATEMENT COMPLAINT  
TO SHA

1 REINSTATEMENT TO

MATTY

GOLDBECK, McCAFFERTY & MCKEEVER



By Joseph A. Goldbeck, Jr., Esq.  
Attorney for Plaintiff

**GOLDBECK McCAFFERTY & McKEEVER**

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Attorney I.D. #16132  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532  
215-627-1322

**ATTORNEY FOR PLAINTIFF**

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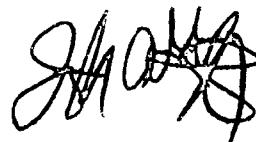
IN THE COURT OF COMMON  
PLEAS OF  
Clearfield COUNTY  
CIVIL ACTION - LAW  
ACTION OF EJECTMENT

Term  
No. 06-1936 cd

**SUGGESTION OF DEATH**

TO THE PROTHONOTARY:

It is respectfully suggested that Defendant Joseph Kachman is deceased, having departed this life on August 10, 2005. Gloria Kachman and Occupants are the appropriate party Defendants. Kindly amend the docket to reflect that the Defendant are Gloria Kachman and Occupants.



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

FILED  
M 11-43304 NO. 60  
JAN 29 2007  
©

William A. Shaw  
Prothonotary/Clerk of Courts

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

Service # 1 of 3 Services

Sheriff Docket #

**102174**

DEUTSCHE BANK NATIONAL TRUST COMPANY

Case # 06-1936-CD

VS.

GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS

TYPE OF SERVICE COMPLAINT IN EJECMENT

**SHERIFF RETURNS**

NOW January 30, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECMENT "NOT FOUND" AS TO GLORIA KACHMAN, DEFENDANT. 416 CLARION ST., CLEARFIELD, PA. "EMPTY".

SERVED BY: /

**FILED**  
01/30/2007  
JAN 30 2007

William A. Shaw  
Prothonotary/Clerk of Courts

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

Service # 2 of 3 Services

Sheriff Docket #

**102174**

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Case # 06-1936-CD

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SERVED BY: /

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

Service # 3 of 3 Services

Sheriff Docket #

**102174**

DEUTSCHE BANK NATIONAL TRUST COMPANY

Case # 06-1936-CD

vs.

GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS

TYPE OF SERVICE COMPLAINT IN EJECMENT

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SERVED BY: /

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

DOCKET # 102174  
NO: 06-1936-CD  
SERVICES 3  
COMPLAINT IN EJECTMENT

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY  
vs.  
DEFENDANT: GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS

## SHERIFF RETURN

## RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	276660	30.00
SHERIFF HAWKINS	GOLDBECK	276660	26.00

### Sworn to Before Me This

## So Answers,

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

✓ 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**

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

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Term  
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**NOV 20 2006**

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statement filed in this case.**

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*William C. Brown*  
Prothonotary/  
Clerk of Courts

COMPLAINT IN EJECTMENT

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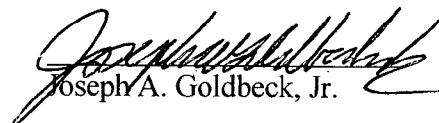


By: Joseph A. Goldbeck, Jr., Esq.

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: 11/17/06



Joseph A. Goldbeck, Jr.

#0061717757 - GLORIA KACHMAN and JOSEPH KACHMAN

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TAX PARCEL #: 4.2K08-228-00049

PROPERTY ADDRESS: 416 Arnold Avenue Rear a/k/a 416 Clarion Street, Clearfield, PA 16830

**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**

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NOV 20 2006

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Attest.

*William L. Lutz*  
Prothonotary/  
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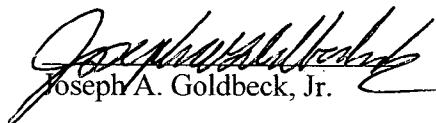


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Term  
No. 06-1936-CD

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

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

NOV 20 2006

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

Attest.

*William C. Brown*  
Prothonotary/  
Clerk of Courts

AVISO  
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 NECESARIO 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 RESPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA CORTE 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 POSIBLE 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.

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PENNSYLVANIA BAR ASSOCIATION  
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800-692-7375

COMPLAINT IN EJECTMENT

1. Plaintiff is DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE, 505 City Parkway West, Suite 100, Orange, CA 92868.
2. Defendants are GLORIA KACHMAN, JOSEPH KACHMAN, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises 416 Arnold Avenue ; Clearfield, PA 16830 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 November 03, 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, GLORIA KACHMAN, JOSEPH KACHMAN 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

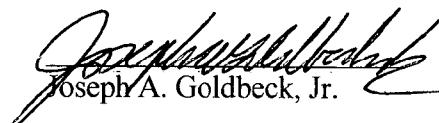


By: Joseph A. Goldbeck, Jr., Esq.

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: 11/17/06



A handwritten signature in black ink, appearing to read "Joseph A. Goldbeck, Jr." The signature is fluid and cursive, with "Joseph" and "A." being more stylized, and "Goldbeck, Jr." being more legible in a standard script.

#0061717757 - GLORIA KACHMAN and JOSEPH KACHMAN

All that certain piece or parcel of land located in the Second Ward, Clearfield Borough, Clearfield County, Pennsylvania, bounded and described as follows:

Beginning at an iron pipe on the west side of a 16 foot alley, said iron pipe being north 36 degrees 00 minutes west 81.5 feet from the northwest corner of the intersection of South Fifth Street and said 16 foot alley and said iron pipe being the southeast corner of the lot herein described; thence along the line of said 16 foot alley north 36 degrees 00 minutes west 81.5 feet to an iron pipe; thence through land of prior grantor south 54 degrees 00 minutes west 75.2 feet to an iron pipe; thence 83.2 feet to an iron pipe; thence through land of prior grantor north 54 degrees 00 minutes east 92.6 feet to an iron pipe and place of beginning.

TAX PARCEL #: 4.2K08-228-00049

PROPERTY ADDRESS: 416 Arnold Avenue Rear a/k/a 416 Clarion Street, Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102333  
NO: 06-1936-CD  
SERVICE # 1 OF 3  
COMPLAINT IN EJECTMENT

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS

SHERIFF RETURN

NOW, January 29, 2007 AT 2:18 PM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON GLORIA KACHMAN DEFENDANT AT 854 WOODLAND BIGLER HWY., WOODLAND, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO GLORIA KACHMAN, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER /

FILED  
01/30/2007  
JAN 30 2007  
S

William A. Shaw  
Prothonotary/Clerk of Courts

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

Service # 2 of 3 Services

Sheriff Docket #

**102333**

DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee

Case # 06-1936-CD

vs.

GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS

TYPE OF SERVICE COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

NOW January 30, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO JOSEPH KACHMAN, DEFENDANT. 416 ARNOLD AVE., CLEARFIELD PA. "EMPTY".

SERVED BY: /

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

Service # 3 of 3 Services

Sheriff Docket #

**102333**

DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee

Case # 06-1936-CD

vs.

GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS

TYPE OF SERVICE COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

NOW January 30, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO OCCUPANTS (KACHMAN PROPERTY), DEFENDANT. 416 ARNOLD AVE., CLEARFIELD, PA. "EMPTY".

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102333  
NO: 06-1936-CD  
SERVICES 3  
COMPLAINT IN EJECTMENT

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS

**SHERIFF RETURN**

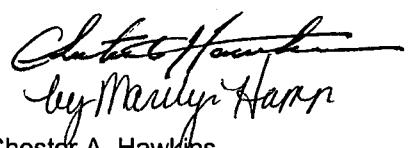
**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	281644	30.00
SHERIFF HAWKINS	GOLDBECK	281644	28.24

Sworn to Before Me This

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

So Answers,

  
by Marilyn Harr  
Chester A. Hawkins  
Sheriff

# ATTORNEY COPY

**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

FILED  
FEB 20 2006

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE OF ARGENT  
MORTGAGE SECURITIES, INC. ASSET-  
BACKED PASS THROUGH CERTIFICATES  
SERIES 2004-W11, UNDER THE POOLING  
AND SERVICING AGREEMENT DATED AS  
OF OCTOBER 1, 2004, WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
JOSEPH KACHMAN  
and OCCUPANTS  
416 Arnold Avenue  
Clearfield, PA 16830

Defendants

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF EJECTMENT

Term

No. 06-1936-CD

## CIVIL ACTION: EJECTMENT

William A. Shaw  
Prothonotary/Clerk of Courts

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814-765-9646

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

### A V I S O

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800-692-7375

JAN. 12, 2007 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

John A. Shaw  
Deputy Prothonotary

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

JAN 12 2007

Attest,

William A. Shaw  
Prothonotary/  
Clerk of Courts

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: 11/17/06



Joseph A. Goldbeck, Jr.

#0061717757 - GLORIA KACHMAN and JOSEPH KACHMAN

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TAX PARCEL #: 4.2K08-228-00049

PROPERTY ADDRESS: 416 Arnold Avenue Rear a/k/a 416 Clarion Street, Clearfield, PA 16830

# ATTORNEY COPY

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

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE OF ARGENT  
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BACKED PASS THROUGH CERTIFICATES  
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505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
JOSEPH KACHMAN  
and OCCUPANTS  
416 Arnold Avenue  
Clearfield, PA 16830

Defendants

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FILED  
NOV 20 2006

William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF EJECTMENT

Term

No. 06-1936-CD

## CIVIL ACTION: EJECTMENT

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

JAN 12 2007 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Deputy Prothonotary

JAN 12 2007

Attest,

William A. Shaw  
Prothonotary/  
Clerk of Courts

COMPLAINT IN EJECTMENT

1. Plaintiff is DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE, 505 City Parkway West, Suite 100, Orange, CA 92868.
2. Defendants are GLORIA KACHMAN, JOSEPH KACHMAN, and OCCUPANTS.
3. Plaintiff is the equitable owner of premises 416 Arnold Avenue ; Clearfield, PA 16830 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 November 03, 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, GLORIA KACHMAN, JOSEPH KACHMAN 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: 11/17/06



Joseph A. Goldbeck, Jr.

#0061717757 - GLORIA KACHMAN and JOSEPH KACHMAN

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TAX PARCEL #: 4.2K08-228-00049

PROPERTY ADDRESS: 416 Arnold Avenue Rear a/k/a 416 Clarion Street, Clearfield, PA 16830

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF  
ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE  
POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER  
1, 2004, WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

No. 06-1936 cd

FILED  
03/20/07  
MAR 14 2007

William A. Shaw  
Prothonotary/Clerk of Courts  
ICCA Atty  
(6K)

ORDER

AND NOW, this 14 day of March 2007, upon consideration of the Plaintiff's Motion for Substituted

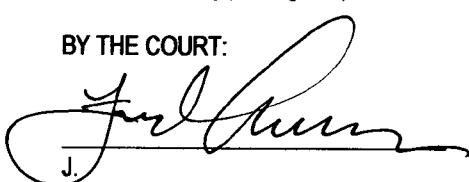
Service under Pa.R.C.P. 430(a) and it appearing to the Court that Plaintiff's good faith efforts to ascertain the present

whereabouts of Defendants has been unsuccessful, it is,

ORDERED and DECREED:

that Plaintiff's Motion is granted and the Sheriff and/or Plaintiff is directed to Serve the Complaint in Ejectment upon Defendants by posting a copy of the Complaint upon the premises 416 Arnold Avenue Rear, a/k/a 416 Clarion Street, Clearfield, PA, 16830, and Plaintiff is directed to serve the Complaint by certified and regular mail to the Defendants' – Occupants last known address at 416 Arnold Avenue Rear, a/k/a 416 Clarion Street, Clearfield, PA, 16830, and Defendant – Gloria Kachman's last known address of 854 Woodland Bigler Highway, Woodland, PA 16881 and that all further service of legal papers, including but not limited to motions, petitions and rules be made by certified and regular mail to Defendants' last known address and that Writ of Possession pursuant to Pennsylvania Rule of Civil Procedure 3129 may be made upon Defendants by sending copies of same to Defendants' last known address by certified and regular mail and by posting the premises.

BY THE COURT:

  
J.

Distribution list:

Michael T. McKeever, Esquire, Suite 5000 – Mellon Independence Center, 701 Market Street, Philadelphia, PA 19106-1532  
Occupants of 416 Arnold Avenue Rear A/k/a 416 Clarion Avenue, Clearfield, PA 16830  
Gloria Kachman 854 Woodland Bigler Highway, Woodland, PA 16881

MAR 14 2007

**FILED**

DATE: 3/14/07

You are responsible for serving all appropriate parties.

The Prothonotary's office has provided service to the following parties:

Plaintiff(s)  Plaintiff(s) Attorney  Other

Defendant(s)  Defendant(s) Attorney

Special Instructions:

GOLDBECK McCAFFERTY & MCKEEVER  
JOSEPH A. GOLDBECK, JR.  
Attorney I.D.#16132  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532  
215-627-1322  
BY: Michael T. McKeever, Esq.  
Attorney I.D. #56129  
Attorney for Plaintiff

FILED

MAR 14 2007

11:30 AM

William A. Shaw  
Prothonotary/Clerk of Courts

1 Cents to Mail

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

No. 06-1936 cd

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

MOTION FOR SUBSTITUTED SERVICE  
UNDER P.A.R.C.P. 430(a)

Plaintiff, by and through its attorney, Michael T. McKeever, Esq., in support of its Motion for Substituted Service, represents as follows:

1. Plaintiff is the legal owner of the premises 416 Arnold Avenue Rear , a/k/a 416 Clarion Street, Clearfield, PA, 16830 pursuant to a deed from the Sheriff of Clearfield County.
2. Plaintiff filed a Complaint in Ejectment on November 20, 2006

3. Sheriff has been unable to effect service of the Complaint upon Defendants at the property despite numerous attempts and despite the fact that Plaintiff's inspection of the premises indicates it is occupied; and the sheriff is contending the property is vacant.

4. **As this is an action for possession, further investigation is unnecessary.**

5. Defendants have no right, title or interest in the premises, 416 Arnold Avenue Rear , a/k/a 416 Clarion Street, Clearfield, PA, 16830. Plaintiff believes and therefore avers that Defendants are deliberately avoiding service.

6. Plaintiff's inability to affect personal service upon Defendants has deprived, and continues to deprive Plaintiff of the use and enjoyment of which it is the lawful owner.

WHEREFORE, Plaintiff prays that the Court enter the attached order allowing Plaintiff to serve the Complaint/Writ upon Defendants by posting the premises and certified and regular mail to the Defendants' last known address.

BY:   
**Michael T. McKeever, Esq.**

**GOLDBECK McCAFFERTY & McKEEVER**

JOSEPH A. GOLDBECK, JR.

Attorney I.D.#16132

Suite 5000 - Mellon Independence Center

701 Market Street

Philadelphia, PA 19106-1532

215-627-1322

BY: Michael T. McKeever, Esq.

Attorney I.D. #56129

Attorney for Plaintiff

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AS TRUSTEE OF ARGENT MORTGAGE  
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IN THE COURT OF COMMON PLEAS  
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No. 06-1936 cd

**VERIFICATION**

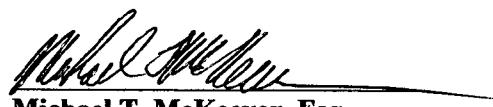
I, Michael T. McKeever, Esq., Attorney for Petitioner do hereby verify that the facts set forth in the foregoing Motion for Substituted Service are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

BY: Michael T. McKeever, Esq.

**CONCLUSION**

For reasons stated above and in the attached Motion, the Court should enter an order allowing Plaintiff to serve the Complaint in Ejectment upon Defendants by posting the premises and certified mail and regular mail to the Defendants' last known address.

Respectfully submitted,



Michael T. McKeever, Esq.

## Affidavit of Good Faith Investigation

### **Client provided information:**

File Number: AMQ-0780 E

Attorney Firm: Goldbeck, McCafferty & McKeever

File Name: Kachman

Subject Name: Gloria Kachman

Property Address:

Street: 416 Arnold Avenue Rear a/k/a 416 Clarion Street

City: Clearfield State: PA Zip: 16830

**Skip Results:** Date of Birth: 10/24/1930 ProVest File Number: 151355

**Last Known** Dates: As of 01/25/2007

Street: 854 Woodland Bigler Highway Phone:

City: Woodland State: PA Zip: 16881

**Death Records:** As of 01/25/2007, the Social Security Administration has no death record on file for Gloria Kachman.

### **Social Security Number search completed.**

**Employment Search:** Unable to verify current employer.

### **Creditor information:**

Creditors indicated the last reported address for Gloria Kachman as 854 Woodland Bigler Highway, Woodland, PA 16881

### **Department of Motor Vehicle Records:**

The Pennsylvania Department of Motor Vehicles provided no change for Gloria Kachman from 854 Woodland Bigler Highway, Woodland, PA 16881

**Public Licenses (Pilot, Real Estate, etc):** Search performed provided no information.

### **Voter Registration Information:**

The County Voters Registration Office has no listing for Gloria Kachman.

**National Postal Address Search:** Has no change for Gloria Kachman from 854 Woodland Bigler Highway, Woodland, PA 16881

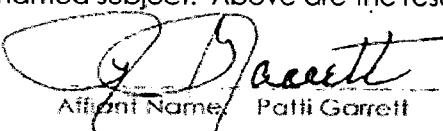
### **Comments:**

814-765-2198: Called possible neighbor, Linda Smeal, there was no answer.

814-765-8173: Spoke with possible neighbor, Gene Lanzfor, does not know defendant.

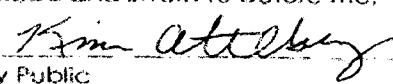
814-857-5132: Called possible neighbor, Donald Geer, there was no answer.

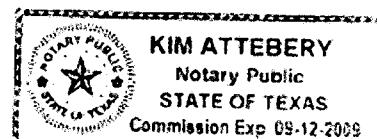
On 01/25/2007, I, Patti Garrett being duly sworn according to the law, deposes and says: I am employed by ProVest, LLC. I have conducted an investigation into the whereabouts of the above named subject. Above are the results of my investigation.

  
Affiant Name: Patti Garrett

Date: 01/25/2007

Subscribed and sworn to before me,

  
Notary Public



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102333  
NO: 06-1936-CD  
SERVICE # 1 OF 3  
COMPLAINT IN EJECTMENT

*Reinstated  
Complaint*

*COPY*

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee  
VS.  
DEFENDANT: GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS

SHERIFF RETURN

NOW, January 29, 2007 AT 2:18 PM SERVED THE WITHIN COMPLAINT IN EJECTMENT ON GLORIA KACHMAN DEFENDANT AT 354 WOODLAND BIGLER HWY., WOODLAND, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO GLORIA KACHMAN, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN EJECTMENT AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER /

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

Service # 3 of 3 Services

Sheriff Docket #

**102333**

DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee

Case #

06-1936-CD

vs.

GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS

TYPE OF SERVICE COMPLAINT IN EJECTMENT

**SHERIFF RETURNS**

NOW January 30, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO OCCUPANTS (KACHMAN PROPERTY), DEFENDANT. 416 ARNOLD AVE., CLEARFIELD, PA. "EMPTY".

SERVED BY: /

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

Service # 3 of 3 Services

Sheriff Docket # **102174**

**DEUTSCHE BANK NATIONAL TRUST COMPANY**

Case # **06-1936-CD**

vs.

**GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS**

**TYPE OF SERVICE COMPLAINT IN EJECTION**

**SHERIFF RETURNS**

NOW January 30, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTION "NOT FOUND" AS TO OCCUPANTS (KACHMAN), DEFENDANT. 416 CLARION ST., CLEARFIELD, PA. "EMPTY".

SERVED BY: /

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

Service # 1 of 3 Services

Sheriff Docket # **102174**

**DEUTSCHE BANK NATIONAL TRUST COMPANY**

Case # **06-1936-CD**

vs.

**GLORIA KACHMAN, JOSEPH KACHMAN and OCCUPANTS**

*CO/EM/*

TYPE OF SERVICE COMPLAINT IN EJECTION

**SHERIFF RETURNS**

NOW January 30, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTION "NOT FOUND" AS TO GLORIA KACHMAN, DEFENDANT. 416 CLARION ST., CLEARFIELD, PA. "EMPTY".

SERVED BY: /

**GOLDBECK McCAFFERTY & McKEEVER**

JOSEPH A. GOLDBECK, JR.

Attorney I.D.#16132

Suite 5000 - Mellon Independence Center

701 Market Street

Philadelphia, PA 19106-1532

215-627-1322

BY: Michael T. McKeever, Esq.

Attorney I.D. #56129

Attorney for Plaintiff

---

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE OF ARGENT  
MORTGAGE SECURITIES, INC. ASSET-BACKED  
PASS THROUGH CERTIFICATES SERIES 2004-  
W11, UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE

505 City Parkway West

Suite 100

Orange, CA 92868

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS

of Clearfield County

No. 06-1936 cd

**CERTIFICATE OF SERVICE**

Michael T. McKeever, Esq., does hereby certify that true and correct copies of the foregoing Motion for Substituted Service have been served upon the Defendants this 8th day of March, 2007, by first class mail, postage prepaid.

BY:   
Michael T. McKeever, Esq.

**GOLDBECK McCAFFERTY & McKEEVER**

BY: JOSEPH A. GOLDBECK, JR.  
ATTORNEY I.D. #16132  
SUITE 5000 – MELLON INDEPENDENCE CENTER  
701 MARKET STREET  
PHILADELPHIA, PA 19106-1532  
(215) 627-1322  
ATTORNEY FOR PLAINTIFF

---

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE OF ARGENT  
MORTGAGE SECURITIES, INC. ASSET-  
BACKED PASS THROUGH CERTIFICATES  
SERIES 2004-W11, UNDER THE POOLING  
AND SERVICING AGREEMENT DATED AS  
OF OCTOBER 1, 2004, WITHOUT  
RE COURSE

505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
& OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

Defendant(s)

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

CIVIL ACTION - LAW  
EJECTMENT COMPLAINT

Term  
No. 06-1936 cd

**PRAECIPE TO REINSTATE COMPLAINT**

Kindly reinstate the Complaint in the above captioned matter.

GOLDBECK, McCAFFERTY & McKEEVER

FILED Atty fd. 7.00  
m12:37:00  
MAR 27 2006 Complaints  
Runstated to Sheriff  
William A. Shaw  
Prothonotary/Clerk of Courts



By Joseph A. Goldbeck, Jr., Esq.  
Attorney for Plaintiff

**GOLDBECK McCAFFERTY & MCKEEVER**  
BY: JOSEPH A. GOLDBECK, JR.  
ATTORNEY I.D. #16132  
SUITE 5000 – MELLON INDEPENDENCE CENTER  
701 MARKET STREET  
PHILADELPHIA, PA 19106-1532  
(215) 627-1322  
ATTORNEY FOR PLAINTIFF

**FILED**  
mTII/05/04  
APR 05 2007  
noce  
William A. Shaw  
Prothonotary/Clerk of Courts

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

vs.

GLORIA KACHMAN  
& OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

*Defendant(s)*

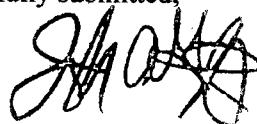
IN THE COURT OF COMMON  
PLEAS  
OF Clearfield COUNTY  
CIVIL ACTION - LAW  
EJECTMENT

Term  
No. 06-1936 cd

**CERTIFICATE OF SERVICE**

JOSEPH A. GOLDBECK, JR. ESQUIRE hereby certifies that on *April 3rd, 2007*  
he did serve upon Defendant(s) GLORIA KACHMAN and OCCUPANTS a true and correct copy of the  
above-captioned Complaint by certified and regular mail in accordance with the Court Order dated March  
14, 2007. The undersigned understands that the statements herein and subject to the penalties provided by  
18 P.S. Section 4904.

Respectfully submitted,



GOLDBECK McCAFFERTY & MCKEEVER  
BY: JOSEPH A. GOLDBECK, JR. ESQUIRE

**GOLDBECK McCAFFERTY & McKEEVER**

A Professional Corporation

By: David Fein, Esquire

Attorney I.D. #: 82628

Suite 5000 – Mellon Independence Center

701 Market Street

Philadelphia, PA 19106-1532

(215) 627-1322

**ATTORNEY FOR PLAINTIFF**

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE OF ARGENT  
MORTGAGE SECURITIES, INC. ASSET-BACKED  
PASS THROUGH CERTIFICATES SERIES 2004-  
W11, UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

No. 06-1936 cd

**FILED**

MAY 23 2007  
m 66.50/1  
William A. Shaw  
Prothonotary/Clerk of Courts  
No. C/c..

**MOTION TO COMPEL SHERIFF TO PROCESS RETURN OF SERVICE**

Plaintiff, DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT  
MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-  
W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE (“Plaintiff”), by and through its attorneys, Goldbeck McCafferty &  
McKeever, moves this Honorable Court for an Order to Compel the Sheriff of Clearfield  
County to process the return of service:

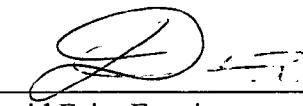
1. On November 20, 2006, Plaintiff filed its Complaint in Ejectment and reinstated its complaint on March 27, 2007.
2. On March 27, 2007, Plaintiff reinstated its complaint and requested that the Sheriff of Clearfield County serve the complaint by posting same on the subject property pursuant to court order.

3. To the best of Plaintiff's knowledge, the Sheriff posted the complaint on April 17, 2007.
4. Pursuant to Pa. R.C.P. No. 405(a), after service is attempted, the Sheriff shall make a return of service or a return of no service forthwith. (emphasis added).
5. Pursuant to Rule 405(e), the return of service or of no service shall be filed with the Prothonotary and mailed to the person requesting service to be made.
6. It has been over a month, yet Plaintiff's counsel has not received the return of service.
7. The Sheriff is not in compliance with Rule 405.
8. The Sheriff's delay has caused prejudice to Plaintiff, as Plaintiff has been unable to continue with this lawsuit.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an Order (i) compelling the Sheriff to process the return of service, and (ii) assessing damages if the Sheriff fails to process the return of service.

Respectfully submitted,

GOLDBECK McCAFFERTY & McKEEVER



---

David Fein, Esquire  
Attorney for Plaintiff

**GOLDBECK McCAFFERTY & MCKEEVER**

A Professional Corporation

By: David Fein, Esquire

Attorney I.D. #: 82628

Suite 5000 – Mellon Independence Center

701 Market Street

Philadelphia, PA 19106-1532

(215) 627-1322

**ATTORNEY FOR PLAINTIFF**

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE OF ARGENT  
MORTGAGE SECURITIES, INC. ASSET-BACKED  
PASS THROUGH CERTIFICATES SERIES 2004-  
W11, UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE

505 City Parkway West

Suite 100

Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

No. 06-1936 cd

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S MOTION TO  
COMPEL SHERIFF TO PROCESS RETURN OF SERVICE**

**I. FACTS**

On November 20, 2006, Plaintiff filed its Complaint in Ejectment and reinstated its complaint on March 27, 2007. On March 27, 2007, Plaintiff reinstated its complaint and requested that the Sheriff of Clearfield County serve the complaint by posting same on the subject property pursuant to court order. To the best of Plaintiff's knowledge, the Sheriff posted the complaint on April 17, 2007.

## II. ARGUMENT

Pursuant to Pa. R.C.P. No. 405(a), after service is attempted, the Sheriff shall make a return of service or a return of no service forthwith. (emphasis added). Pursuant to Rule 405(e), the return of service or of no service shall be filed with the Prothonotary and mailed to the person requesting service to be made. It has been over a month, yet Plaintiff's counsel has not received the return of service. The Sheriff is not in compliance with Rule 405.

## III. CONCLUSION

The Sheriff's delay has caused prejudice to Plaintiff, as Plaintiff has been unable to continue with this lawsuit. Plaintiff therefore requests that this Honorable Court enter an Order (i) compelling the Sheriff to process the return of service, and (ii) assessing damages if the Sheriff fails to process the return of service.

Respectfully submitted,

GOLDBECK, McCAFFERTY & MCKEEVER



---

David Fein, Esquire  
Attorney for Plaintiff

**GOLDBECK McCAFFERTY & McKEEVER**

A Professional Corporation

By: David Fein, Esquire

Attorney I.D. #: 82628

Suite 5000 – Mellon Independence Center

701 Market Street

Philadelphia, PA 19106-1532

(215) 627-1322

**ATTORNEY FOR PLAINTIFF**

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE OF ARGENT  
MORTGAGE SECURITIES, INC. ASSET-BACKED  
PASS THROUGH CERTIFICATES SERIES 2004-  
W11, UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE

505 City Parkway West

Suite 100

Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

No. 06-1936 cd

**VERIFICATION**

David Fein, Esquire, hereby states that he is the attorney for Plaintiff herein, and that all of the facts set forth within the attached Motion are true and correct to the best of his knowledge, information and belief. The undersigned understands that the foregoing statements are made subject to the penalties of 18 P.S. Section 4904.

**GOLDBECK McCAFFERTY & McKEEVER**

By:



David Fein, Esquire  
Attorney for Plaintiff

**GOLDBECK McCAFFERTY & McKEEVER**

A Professional Corporation  
By: David Fein, Esquire  
Attorney I.D. #: 82628  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532  
(215) 627-1322

**ATTORNEY FOR PLAINTIFF**

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE OF ARGENT  
MORTGAGE SECURITIES, INC. ASSET-BACKED  
PASS THROUGH CERTIFICATES SERIES 2004-  
W11, UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

No. 06-1936 cd

**CERTIFICATION OF SERVICE**

David Fein, Esquire, hereby certifies that on 5/22/07 he did serve true and correct copies of the  
within Motion by first class mail, postage pre-paid upon the following:

Chester A. Hawkins  
Sheriff of Clearfield County  
230 East Market Street  
Clearfield, PA 16830

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue  
Clearfield, PA 16830

GLORIA KACHMAN  
854 Woodland Bigler Highway  
Woodland, PA 16881

**GOLDBECK McCAFFERTY & McKEEVER**



David Fein, Esquire  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICE # 1 OF 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

NOW, April 17, 2007 AT 2:55 PM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416  
ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA.  
(GLORIA KACHMAN)

SERVED BY: HUNTER / DEHAVEN

FILED  
02:35 PM  
MAY 25 2007  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICE # 2 OF 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
VS.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

NOW, April 17, 2007 AT 2:55 PM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416  
ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA. (OCCUPANTS)

SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICES 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

---

**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	289234	20.00
SHERIFF HAWKINS	GOLDBECK	289234	17.00

Sworn to Before Me This

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

So Answers,

  
Chester A. Hawkins  
Sheriff

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

DEUTSCHE BANK NATIONAL TRUST COMPANY, \*  
as TRUSTEE of ARGENT MORTGAGE SECURITIES \*  
INC., ASSET-BACKED PASS THROUGH CERTIFICATES \*  
SERIES 2004-W11, UNDER THE POOLING and \*  
SERVICING AGREEMENT DATED as of OCTOBER 1, 2004\*  
WITHOUT RE COURSE,

Plaintiff

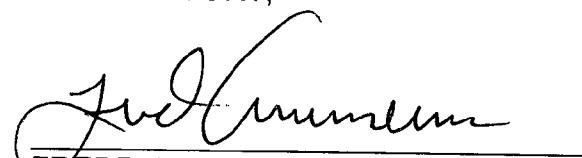
vs.  
GLORIA KACHMAN and OCCUPANTS  
416 ARNOLD AVENUE, CLEARFIELD, PA 16830  
Defendants

NO. 06-1936-CD

O R D E R

NOW, this 24<sup>th</sup> day of May, 2007, the Court noting the difficulties caused relative no Sheriff's Return having yet been filed with the Prothonotary, and in consideration of Pa. R.C.P. 405 (a) and the Plaintiff's Motion for to Compel Sheriff to Process Return of Service, it is the ORDER of this Court that the Sheriff cause a Return of Service to be filed with the Prothonotary by no later than 3:30 p.m. on Friday, May 25, 2007. The Prothonotary shall notify the Court as to the filing of the return.

BY THE COURT,

  
FREDERIC J. AMMERMAN  
President Judge

FILED 2CC  
MAY 25 2007 AHyFein  
1CC Sheriff  
William A. Shaw  
Prothonotary/Clerk of Courts  
GK

DATE: 5/25/07

       You are responsible for serving all process to parties

The Prothonotary's office has provided service to Plaintiff(s)

Plaintiff(s) Attorney

Defendant(s) Attorney

Defendants

Sheriff

       Special Instructions:

Prothonotary/Clerk of Courts  
William A. Shaw

MAY 25 2007

FILED

**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

**FILED**

**MAY 31 2007**

*m 11. 20 (w)*

William A. Shaw  
Prothonotary/Clerk of Courts

*I cert to Atty  
return to Clerk*

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC.  
ASSET-BACKED PASS THROUGH CERTIFICATES  
SERIES 2004-W11, UNDER THE POOLING AND  
SERVICING AGREEMENT DATED AS OF OCTOBER 1,  
2004, WITHOUT RE COURSE

505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

Defendants

IN THE COURT OF COMMON  
PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF EJECTMENT

Term  
No. 06-1936 cd

**PRAECIPE FOR JUDGMENT IN EJECTMENT**

Kindly enter Judgment in Ejectment in favor of the Plaintiff, DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE and against the Defendants GLORIA KACHMAN and OCCUPANTS for failure to file an Answer in the above action within (20) days of service.

I HEREBY CERTIFY THAT ACCORDING TO rule 237.1, written 10 day notice of Plaintiff's intention to file a Praecipe for Entry of Default Judgment was mailed to Defendants, a true and correct copy of which is attached hereto.

I hereby certify that the above names are correct and that the precise residence address of the judgment creditor is DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE, 505 City Parkway West, Suite 100, Orange, CA 92868 and that the names and last known address of the Defendants are GLORIA KACHMAN and OCCUPANTS 416 Arnold Avenue Rear , a/k/a 416 Clarion Street, Clearfield, PA 16830.

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

## OFFICE OF THE PROTHONOTARY

COURT OF COMMON PLEAS  
Prothonotary of Clearfield County 230 E. Market Street Clearfield,  
PA 16830

William Shaw -- Prothonotary

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT REOURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Term  
No. 06-1936 cd

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

Defendants

### N O T I C E

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:

William Shaw  
Prothonotary

- Judgment by Default
- Money Judgment
- Judgment in Replevin
- Judgment for Possession
- Judgment on Aware of Arbitration
- Judgment on Verdict
- Judgment on Court Findings
- Confession of Judgment

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:  
ATTORNEY Joseph A. Goldbeck, Jr. at the following telephone number:

(215) 825-6319

**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**

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC.  
ASSET-BACKED PASS THROUGH CERTIFICATES  
SERIES 2004-W11, UNDER THE POOLING AND  
SERVICING AGREEMENT DATED AS OF OCTOBER 1,  
2004, WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff  
vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

Defendants

IN THE COURT OF COMMON  
PLEAS  
of Clearfield County  
CIVIL ACTION - LAW  
ACTION OF EJECTMENT

Term  
No. 06-1936 cd

**CERTIFICATION PURSUANT TO PA R.C.P. NO. 237**

I, Joseph A. Goldbeck, Esquire, attorney for Plaintiff, certify that a true and correct copy of the Praeclipe for Judgment was sent to the following parties, via first class mail, postage prepaid:

GLORIA KACHMAN  
OCCUPANTS  
416 Arnold Avenue  
Clearfield, PA 16830

GOLDBECK McCAFFERTY & McKEEVER

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

DATED: May 30, 2007

**GOLDBECK McCAFFERTY & MCKEEVER**

**BY: JOSEPH A. GOLDBECK, JR.**

**ATTORNEY I.D. #16132**

**SUITE 5000 – MELLON INDEPENDENCE CENTER**

**701 MARKET STREET**

**PHILADELPHIA, PA 19106-1532**

**(215) 627-1322**

**ATTORNEY FOR PLAINTIFF**

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

vs.

GLORIA KACHMAN  
Mortgagor(s)  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

*Defendant(s)*

IN THE COURT OF COMMON  
PLEAS  
OF Clearfield COUNTY  
CIVIL ACTION - LAW  
ACTION OF MORTGAGE  
FORECLOSURE

Term  
No. 06-1936 cd

**CERTIFICATE OF SERVICE**

JOSEPH A. GOLDBECK, JR. ESQUIRE hereby certifies that on March 16<sup>th</sup>, 2007  
he did serve upon Defendant(s) GLORIA KACHMAN a true and correct copy of the above-captioned  
Complaint by certified and regular mail in accordance with the Court Order dated March 14<sup>th</sup>, 2007. The  
undersigned understands that the statements herein and subject to the penalties provided by 18 P.S.  
Section 4904.

Respectfully submitted,

*Joseph A. Goldbeck Jr.*  
GOLDBECK McCAFFERTY & MCKEEVER  
BY: JOSEPH A. GOLDBECK, JR. ESQUIRE

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF  
ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE  
POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER  
1, 2004, WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

No. 06-1936 cd

ORDER

AND NOW, this 14<sup>th</sup> day of March 2007, upon consideration of the Plaintiff's Motion for Substituted Service under Pa.R.C.P. 430(a) and it appearing to the Court that Plaintiff's good faith efforts to ascertain the present whereabouts of Defendants has been unsuccessful, it is,

ORDERED and DECREED:

that Plaintiff's Motion is granted and the Sheriff and/or Plaintiff is directed to Serve the Complaint in Ejectment upon Defendants by posting a copy of the Complaint upon the premises 416 Arnold Avenue Rear , a/k/a 416 Clarion Street, Clearfield, PA, 16830, and Plaintiff is directed to serve the Complaint by certified and regular mail to the Defendants' – Occupants last known address at 416 Arnold Avenue Rear , a/k/a 416 Clarion Street, Clearfield, PA, 16830, and Defendant – Gloria Kachman's last known address of 854 Woodland Bigler Highway, Woodland, PA 16881 and that all further service of legal papers, including but not limited to motions, petitions and rules be made by certified and regular mail to Defendants' last known address and that Writ of Possession pursuant to Pennsylvania Rule of Civil Procedure 3129 may be made upon Defendants by sending copies of same to Defendants' last known address by certified and regular mail and by posting the premises.

BY THE COURT:

Judge Ammerman

Distribution list:

Michael T. McKeever, Esquire, Suite 5000 – Mellon Independence Center, 701 Market Street, Philadelphia, PA 19108-1532  
Occupants of 416 Arnold Avenue Rear A/k/a 416 Clarion Avenue; Clearfield, PA 16830  
Gloria Kachman 854 Woodland Bigler Highway; Woodland, PA 16881

GOLDBECK McCAFFERTY & McKEEVER  
BY: JOSEPH A. GOLDBECK, JR.  
ATTORNEY I.D. #16132  
SUITE 5000 – MELLON INDEPENDENCE CENTER  
701 MARKET STREET  
PHILADELPHIA, PA 19106-1532  
(215) 627-1322  
ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC.  
ASSET-BACKED PASS THROUGH CERTIFICATES SERIES  
2004-W11, UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT  
RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

Defendants

DATE OF THIS NOTICE: May 8, 2007

TO: GLORIA KACHMAN  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

IMPORTANT NOTICE

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

KEYSTONE LEGAL SERVICES  
211 1/2 E. Locust Street  
Clearfield, PA 16830

PENNSYLVANIA BAR ASSOCIATION  
P.O. Box 186  
Harrisburg, PA 17108

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY  
CIVIL ACTION - LAW  
ACTION OF EJECTMENT  
Term  
No. 06-1936 cd

  
/ER  
BY: Joseph A. Goldbeck, Jr., Esq.  
Attorney for Plaintiff

GOLDBECK McCAFFERTY & McKEEVER  
BY: JOSEPH A. GOLDBECK, JR.  
ATTORNEY I.D. #16132  
SUITE 5000 – MELLON INDEPENDENCE CENTER  
701 MARKET STREET  
PHILADELPHIA, PA 19106-1532  
(215) 627-1322  
ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC.  
ASSET-BACKED PASS THROUGH CERTIFICATES SERIES  
2004-W11, UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT  
RECOURSE

505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

Defendants

DATE OF THIS NOTICE: May 8, 2007

TO: OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

IMPORTANT NOTICE

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

KEYSTONE LEGAL SERVICES  
211 1/2 E. Locust Street  
Clearfield, PA 16830

PENNSYLVANIA BAR ASSOCIATION  
P.O. Box 186  
Harrisburg, PA 17108

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

VERIFICATION OF NON-MILITARY SERVICE

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

1. That the above named Defendant, GLORIA KACHMAN, is about unknown years of age, that Defendant's last known residence is, 416 Arnold Avenue Clearfield, PA 16830, and is engaged in the unknown business located at unknown address.
2. That Defendant is not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Action of Congress of 1940 and its Amendments.

Date: 5-30-07

Joseph A. Goldbeck Jr.

## THE COMMONWEALTH OF PENNSYLVANIA

## COUNTY OF Clearfield

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS

416 Arnold Avenue Rear  
a/k/a 416 Clarion Street

Clearfield, PA 16830

Defendants

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

06-1936 cd

**FILED**

MAY 31 2007

m 11:45/2007  
William A. Shaw  
Prothonotary/Clerk of Courts1 week to Party  
6 weeks to Serve

## PRAECLYPE FOR WRIT POSSESSION

TO THE PROTHONOTARY:

Issue the Writ of Possession in the above matter, for possession of (describe property)

SEE ATTACHED LEGAL DESCRIPTION

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

WRIT OF POSSESSION (Ejectment Proceedings PRCP 3160-3165)

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

COURT OF COMMON PLEAS

Term

No. 06-1936 cd

WRIT OF POSSESSION  
COMMONWEALTH OF PENNSYLVANIA

COUNTY OF Clearfield

To the Sheriff of Clearfield County, Pennsylvania.

(1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE, Plaintiff, being: (Premises as follows): 416 Arnold Avenue Rear a/k/a 416 Clarion Street Clearfield, PA 16830

(2) To satisfy the costs against the defendants you are directed to levy upon any property of the defendants and sell his, her or their interest therein.

  
\_\_\_\_\_  
Prothonotary, Court of Common Pleas  
Clearfield County

By: \_\_\_\_\_  
\_\_\_\_\_  
Deputy

Dated: May 31, 2007

Term  
No. 06-1936 cd

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

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED  
PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF  
OCTOBER 1, 2004, WITHOUT RE COURSE

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

---

**WRIT OF POSSESSION**

---

Costs

GOLDBECK, McCAFFERTY, McKEEVER  
Suite 5000 Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
(215) 825-6319

All that certain piece or parcel of land located in the Second Ward, Clearfield Borough, Clearfield County, Pennsylvania, bounded and described as follows:

Beginning at an iron pipe on the west side of a 16 foot alley, said iron pipe being north 36 degrees 00 minutes west 81.5 feet from the northwest corner of the intersection of South Fifth Street and said 16 foot alley and said iron pipe being the southeast corner of the lot herein described; thence along the line of said 16 foot alley north 36 degrees 00 minutes west 81.5 feet to an iron pipe; thence through land of prior grantor south 54 degrees 00 minutes west 75.2 feet to an iron pipe; thence 83.2 feet to an iron pipe; thence through land of prior grantor north 54 degrees 00 minutes east 92.6 feet to an iron pipe and place of beginning.

TAX PARCEL #: 4.2K08-228-00049

PROPERTY ADDRESS: 416 Arnold Avenue Rear a/k/a 416 Clarion Street, Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICE # 1 OF 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.

DEFENDANT: GLORIA KACHMAN and OCCUPANTS

COPY

SHERIFF RETURN

NOW, April 17, 2007 AT 2:55 PM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416  
ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA.  
(GLORIA KACHMAN)

SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICE # 2 OF 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

NOW, April 17, 2007 AT 2:55 PM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416  
ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA. (OCCUPANTS)  
SERVED BY: HUNTER / DEHAVEN

William A. Shaw  
Prothonotary/Clerk of Courts  
P.O. Box 549  
Clearfield, PA 16830

JUN 07 2007  
M/12:00/07

William A. Shaw  
Prothonotary/Clerk of Courts

FILED

6/10  
Gloria Kachman and Occupants  
416 Arnold Avenue Rear

VAC/UR  
VAC



NIXIE 165 1 00 06/05/07  
NOT RETURNABLE TO SENDER  
UNABLE TO FORWARD  
BC: 16030054949 \*2343-10003-31-38  
[REDACTED]

**OFFICE OF THE PROTHONOTARY**

COURT OF COMMON PLEAS  
Prothonotary of Clearfield County 230 E. Market Street Clearfield,  
PA 16830

William Shaw -- Prothonotary

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Term  
No. 06-1936 cd

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

Defendants

**N O T I C E**

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:

*W.S.* 5-31-07

William Shaw  
Prothonotary

- Judgment by Default
- Money Judgment
- Judgment in Replevin
- Judgment for Possession
- Judgment on Aware of Arbitration
- Judgment on Verdict
- Judgment on Court Findings
- Confession of Judgment

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:  
ATTORNEY Joseph A. Goldbeck, Jr. at the following telephone number:

(215) 825-6319

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

**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

MAY 31 2007

Attest.

*William L. Schaeffer*  
Prothonotary/  
Clerk of Courts

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC.  
ASSET-BACKED PASS THROUGH CERTIFICATES  
SERIES 2004-W11, UNDER THE POOLING AND  
SERVICING AGREEMENT DATED AS OF OCTOBER 1,  
2004, WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

Defendants

IN THE COURT OF COMMON  
PLEAS  
of Clearfield County  
CIVIL ACTION - LAW  
ACTION OF EJECTMENT

Term  
No. 06-1936 cd

**PRAECIPE FOR JUDGMENT IN EJECTMENT**

Kindly enter Judgment in Ejectment in favor of the Plaintiff, DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE and against the Defendants GLORIA KACHMAN and OCCUPANTS for failure to file an Answer in the above action within (20) days of service.

I HEREBY CERTIFY THAT ACCORDING TO rule 237.1, written 10 day notice of Plaintiff's intention to file a Praecipe for Entry of Default Judgment was mailed to Defendants, a true and correct copy of which is attached hereto.

I hereby certify that the above names are correct and that the precise residence address of the judgment creditor is DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE, 505 City Parkway West, Suite 100, Orange, CA 92868 and that the names and last known address of the Defendants are GLORIA KACHMAN and OCCUPANTS 416 Arnold Avenue Rear , a/k/a 416 Clarion Street, Clearfield, PA 16830.

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

**GOLDBECK McCAFFERTY & McKEEVER**

BY: JOSEPH A. GOLDBECK, JR.

ATTORNEY I.D. #16132

SUITE 5000 – MELLON INDEPENDENCE CENTER

701 MARKET STREET

PHILADELPHIA, PA 19106-1532

(215) 627-1322

**ATTORNEY FOR PLAINTIFF**

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE

505 City Parkway West

Suite 100

Orange, CA 92868

vs.

GLORIA KACHMAN

Mortgagor(s)

416 Arnold Avenue Rear

a/k/a 416 Clarion Street

Clearfield, PA 16830

*Defendant(s)*

IN THE COURT OF COMMON  
PLEAS  
OF Clearfield COUNTY  
CIVIL ACTION - LAW  
ACTION OF MORTGAGE  
FORECLOSURE

Term  
No. 06-1936 cd

**CERTIFICATE OF SERVICE**

JOSEPH A. GOLDBECK, JR. ESQUIRE hereby certifies that on March 16<sup>th</sup>, 2007

he did serve upon Defendant(s) GLORIA KACHMAN a true and correct copy of the above-captioned

Complaint by certified and regular mail in accordance with the Court Order dated March 14<sup>th</sup>, 2007. The

undersigned understands that the statements herein and subject to the penalties provided by 18 P.S.

Section 4904.

Respectfully submitted,

*Joseph A. Goldbeck Jr.*  
GOLDBECK McCAFFERTY & McKEEVER  
BY: JOSEPH A. GOLDBECK, JR. ESQUIRE

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF  
ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE  
POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER  
1, 2004, WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

No. 06-1936 cd

ORDER

AND NOW, this 14<sup>th</sup> day of March 2007, upon consideration of the Plaintiff's Motion for Substituted Service under Pa.R.C.P. 430(a) and it appearing to the Court that Plaintiff's good faith efforts to ascertain the present whereabouts of Defendants has been unsuccessful, it is,

ORDERED and DECREED:

that Plaintiff's Motion is granted and the Sheriff and/or Plaintiff is directed to Serve the Complaint in Ejectment upon Defendants by posting a copy of the Complaint upon the premises 416 Arnold Avenue Rear , a/k/a 416 Clarion Street, Clearfield, PA, 16830, and Plaintiff is directed to serve the Complaint by certified and regular mail to the Defendants' – Occupants last known address at 416 Arnold Avenue Rear , a/k/a 416 Clarion Street, Clearfield, PA, 16830, and Defendant – Gloria Kachman's last known address of 854 Woodland Bigler Highway; Woodland, PA 16881 and that all further service of legal papers, including but not limited to motions, petitions and rules be made by certified and regular mail to Defendants' last known address and that Writ of Possession pursuant to Pennsylvania Rule of Civil Procedure 3129 may be made upon Defendants by sending copies of same to Defendants' last known address by certified and regular mail and by posting the premises.

BY THE COURT:

Judge Ammerman

Distribution list:

Michael T. McKeever, Esquire, Suite 5000 – Mellon Independence Center, 701 Market Street, Philadelphia, PA 19106-1532  
Occupants of 416 Arnold Avenue Rear A/k/a 416 Clarion Avenue; Clearfield, PA 16830  
Gloria Kachman 854 Woodland Bigler Highway; Woodland, PA 16881

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102854  
NO: 06-1936-CD  
SERVICE # 1 OF 2  
WRIT OF POSSESSION

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, as Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

NOW, June 06, 2007 AT 10:30 AM SERVED THE WITHIN WRIT OF POSSESSION ON GLORIA KACHMAN DEFENDANT AT 416 ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO POSTED ON PROPERTY, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF POSSESSION AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

**FILED**

JUN 08 2007  
0/9150  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102854  
NO: 06-1936-CD  
SERVICE # 2 OF 2  
WRIT OF POSSESSION

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, as Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

NOW, June 06, 2007 AT 10:30 AM SERVED THE WITHIN WRIT OF POSSESSION ON OCCUPANT (KACHMAN PROPERTY) DEFENDANT AT 416 ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO POSTED ON PROPERTY, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF POSSESSION AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102854  
NO: 06-1936-CD  
SERVICES 2  
WRIT OF POSSESSION

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, as Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

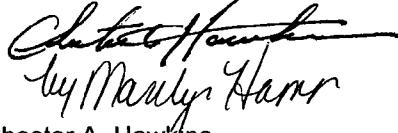
**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	296923	20.00
SHERIFF HAWKINS	GOLDBECK	296923	26.00

Sworn to Before Me This

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

So Answers,



Chester A. Hawkins  
Sheriff

WRIT OF POSSESSION (Ejectment Proceedings PRCP 3160-3165)

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

COURT OF COMMON PLEAS

Term

No. 06-1936 cd

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF Clearfield

To the Sheriff of Clearfield County, Pennsylvania.

(1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE, Plaintiff, being: (Premises as follows): 416 Arnold Avenue Rear a/k/a 416 Clarion Street Clearfield, PA 16830

(2) To satisfy the costs against the defendants you are directed to levy upon any property of the defendants and sell his, her or their interest therein.

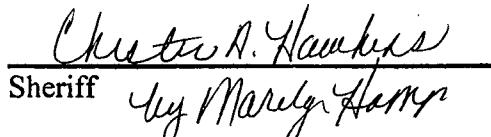
  
Prothonotary, Court of Common Pleas  
Clearfield County

By: \_\_\_\_\_

Deputy \_\_\_\_\_

Dated: May 31, 2007

Received this writ this 31 day  
of May A.D. 2007  
At 3:00 A.M./P.M.

  
Sheriff by Marilyn Harry

Term  
No. 06-1936 cd

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

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED  
PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF  
OCTOBER 1, 2004, WITHOUT RE COURSE

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

**WRIT OF POSSESSION**

---

Costs

GOLDBECK, McCAFFERTY, MCKEEVER  
Suite 5000 Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
(215) 825-6319

All that certain piece or parcel of land located in the Second Ward, Clearfield Borough, Clearfield County, Pennsylvania, bounded and described as follows:

Beginning at an iron pipe on the west side of a 16 foot alley, said iron pipe being north 36 degrees 00 minutes west 81.5 feet from the northwest corner of the intersection of South Fifth Street and said 16 foot alley and said iron pipe being the southeast corner of the lot herein described; thence along the line of said 16 foot alley north 36 degrees 00 minutes west 81.5 feet to an iron pipe; thence through land of prior grantor south 54 degrees 00 minutes west 75.2 feet to an iron pipe; thence 83.2 feet to an iron pipe; thence through land of prior grantor north 54 degrees 00 minutes east 92.6 feet to an iron pipe and place of beginning.

TAX PARCEL #: 4.2K08-228-00049

PROPERTY ADDRESS: 416 Arnold Avenue Rear a/k/a 416 Clarion Street, Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICE # 1 OF 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.

DEFENDANT: GLORIA KACHMAN and OCCUPANTS

COPY

SHERIFF RETURN

NOW, April 17, 2007 AT 2:55 PM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416  
ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA.  
(GLORIA KACHMAN)

SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICE # 2 OF 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

NOW, April 17, 2007 AT 2:55 PM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416  
ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA. (OCCUPANTS)  
SERVED BY: HUNTER / DEHAVEN

WRIT OF POSSESSION (Ejectment Proceedings PRCP 3160-3165)

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

COURT OF COMMON PLEAS

Term

No. 06-1936 cd

WRIT OF POSSESSION  
COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF Clearfield

To the Sheriff of Clearfield County, Pennsylvania.

(1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE, Plaintiff, being: (Premises as follows): 416 Arnold Avenue Rear a/k/a 416 Clarion Street Clearfield, PA 16830

(2) To satisfy the costs against the defendants you are directed to levy upon any property of the defendants and sell his, her or their interest therein.

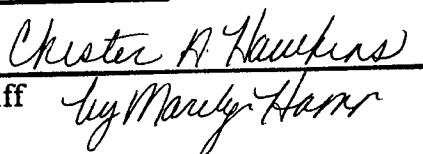
  
Prothonotary, Court of Common Pleas  
Clearfield County

By: \_\_\_\_\_

Deputy

Received this writ this 31 day  
of May A.D. 2007  
At 3:00 A.M./P.M.

Dated: May 31, 2007

  
Chester A. Hawkins  
Sheriff Sgt. Marcy Harris

Term  
No. 06-1936 cd

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

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED  
PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF  
OCTOBER 1, 2004, WITHOUT RE COURSE

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

**WRIT OF POSSESSION**

Costs

GOLDBECK, McCAFFERTY, McKEEVER  
Suite 5000 Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
(215) 825-6319

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TAX PARCEL #: 4.2K08-228-00049

PROPERTY ADDRESS: 416 Arnold Avenue Rear a/k/a 416 Clarion Street, Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICE # 1 OF 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.

DEFENDANT: GLORIA KACHMAN and OCCUPANTS

COPY

SHERIFF RETURN

NOW, April 17, 2007 AT 2:55 PM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416  
ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA.  
(GLORIA KACHMAN)

SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICE # 2 OF 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.

DEFENDANT: GLORIA KACHMAN and OCCUPANTS

SHERIFF RETURN

NOW, April 17, 2007 AT 2:55 PM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416  
ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA. (OCCUPANTS)  
SERVED BY: HUNTER / DEHAVEN

WRIT OF POSSESSION (Ejectment Proceedings PRCP 3160-3165)

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

COURT OF COMMON PLEAS

Term

No. 06-1936 cd

COMMONWEALTH OF PENNSYLVANIA

WRIT OF POSSESSION

COUNTY OF Clearfield

To the Sheriff of Clearfield County, Pennsylvania.

(1) To satisfy the judgment for possession in the above matter you are directed to deliver possession of the following described property to DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER 1, 2004, WITHOUT RE COURSE, Plaintiff, being: (Premises as follows): 416 Arnold Avenue Rear a/k/a 416 Clarion Street Clearfield, PA 16830

(2) To satisfy the costs against the defendants, you are directed to levy upon any property of the defendants and sell his, her or their interest therein.

  
Prothonotary, Court of Common Pleas  
Clearfield County

By: \_\_\_\_\_

Deputy

Received this writ this 31 day  
of May A.D. 2007  
At 3:00 A.M./P.M.

Dated: May 31, 2007

Clinton A. Hawley  
Sheriff by Manlyz Ham

Term  
No. 06-1936 cd

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

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED  
PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF  
OCTOBER 1, 2004, WITHOUT RE COURSE

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

**WRIT OF POSSESSION**

Costs

GOLDBECK, McCAFFERTY, MCKEEVER  
Suite 5000 Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
(215) 825-6319

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TAX PARCEL #: 4.2K08-228-00049

PROPERTY ADDRESS: 416 Arnold Avenue Rear a/k/a 416 Clarion Street, Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICE # 1 OF 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.

DEFENDANT: GLORIA KACHMAN and OCCUPANTS

COPY

SHERIFF RETURN

NOW, April 17, 2007 AT 2:55 PM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416  
ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA.  
(GLORIA KACHMAN)

SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102616  
NO: 06-1936-CD  
SERVICE # 2 OF 2  
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

SHERIFF RETURN

NOW, April 17, 2007 AT 2:55 PM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416  
ARNOLD AVE. REAR aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA. (OCCUPANTS)  
SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102942  
NO: 06-1936-CD  
SERVICE # 1 OF 2  
WRIT OF POSSESSION & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
VS.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

NOW, July 02, 2007 AT 2:10 PM POSTED THE WITHIN WRIT OF POSSESSION & ORDER AT 416 ARNOLD AVE. Rear; aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA. (GLORIA KACHMAN)

SERVED BY: HUNTER /

FILED  
0/2:55 pm  
JUL 24 2007  
LSN  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102942  
NO: 06-1936-CD  
SERVICE # 2 OF 2  
WRIT OF POSSESSION & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

---

NOW, July 02, 2007 AT 2:11 PM POSTED THE WITHIN WRIT OF POSSESSION & ORDER AT 416 ARNOLD AVE. Rear aka 416 CLARION ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA. (OCCUPANT)

SERVED BY: HUNTER /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102942  
NO: 06-1936-CD  
SERVICES 2  
WRIT OF POSSESSION & ORDER

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee  
vs.  
DEFENDANT: GLORIA KACHMAN and OCCUPANTS

**SHERIFF RETURN**

**RETURN COSTS**

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	299673	20.00
SHERIFF HAWKINS	GOLDBECK	299673	19.00

Sworn to Before Me This

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

So Answers,



\_\_\_\_\_  
by Marlyn Harris

Chester A. Hawkins  
Sheriff

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF  
ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE  
POOLING AND SERVICING AGREEMENT DATED AS OF OCTOBER  
1, 2004, WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

No. 06-1936 cd

ORDER

AND NOW, this 14<sup>th</sup> day of March 2007, upon consideration of the Plaintiff's Motion for Substituted Service under Pa.R.C.P. 430(a) and it appearing to the Court that Plaintiff's good faith efforts to ascertain the present whereabouts of Defendants has been unsuccessful, it is,

ORDERED and DECREED:

that Plaintiff's Motion is granted and the Sheriff and/or Plaintiff is directed to Serve the Complaint in Ejectment upon Defendants by posting a copy of the Complaint upon the premises 416 Arnold Avenue Rear , a/k/a 416 Clarion Street, Clearfield, PA, 16830, and Plaintiff is directed to serve the Complaint by certified and regular mail to the Defendants' – Occupants last known address at 416 Arnold Avenue Rear , a/k/a 416 Clarion Street, Clearfield, PA, 16830, and Defendant – Gloria Kachman's last known address of 854 Woodland Bigler Highway, Woodland, PA 16881 and that all further service of legal papers, including but not limited to motions, petitions and rules be made by certified and regular mail to Defendants' last known address and that Writ of Possession pursuant to Pennsylvania Rule of Civil Procedure 3129 may be made upon Defendants by sending copies of same to Defendants' last known address by certified and regular mail and by posting the premises.

BY THE COURT:

/s/ Judge Ammerman

Distribution list:

Michael T. McKeever, Esquire, Suite 5000 – Mellon Independence Center, 701 Market Street, Philadelphia, PA 19106-1532  
Occupants of 416 Arnold Avenue Rear A/k/a 416 Clarion Avenue, Clearfield, PA 16830  
Gloria Kachman 854 Woodland Bigler Highway, Woodland, PA 16881

## THE COMMONWEALTH OF PENNSYLVANIA

## COUNTY OF Clearfield

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
UNDER THE POOLING AND SERVICING  
AGREEMENT DATED AS OF OCTOBER 1, 2004,  
WITHOUT RE COURSE  
505 City Parkway West  
Suite 100  
Orange, CA 92868

Plaintiff

vs.

GLORIA KACHMAN  
and OCCUPANTS

416 Arnold Avenue Rear  
a/k/a 416 Clarion Street

Clearfield, PA 16830

Defendants

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

06-1936 cd

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

MAY 31 2007

Attest.

William A. Goldbeck  
Prothonotary/  
Clerk of Courts

## PRAECIPE FOR WRIT POSSESSION

## TO THE PROTHONOTARY:

Issue the Writ of Possession in the above matter, for possession of (describe property)

SEE ATTACHED LEGAL DESCRIPTION

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

WRIT OF POSSESSION (Ejectment Proceedings PRCP 3160-3165)

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE OF ARGENT MORTGAGE  
SECURITIES, INC. ASSET-BACKED PASS  
THROUGH CERTIFICATES SERIES 2004-W11,  
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Plaintiff

vs.

GLORIA KACHMAN  
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416 Arnold Avenue Rear  
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Clearfield, PA 16830

COURT OF COMMON PLEAS

Term

No. 06-1936 cd

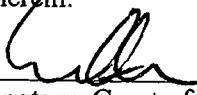
WRIT OF POSSESSION  
COMMONWEALTH OF PENNSYLVANIA

COUNTY OF Clearfield

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(2) To satisfy the costs against the defendants you are directed to levy upon any property of the defendants and sell his, her or their interest therein.

  
Prothonotary, Court of Common Pleas  
Clearfield County

By: \_\_\_\_\_

Deputy

Dated: 5-31-07

Received this writ this 26 day  
of June A.D. 2007  
At 11:30 A.M./P.M.

Chet A. Hawkins  
Sheriff by Maryann  
Hawkins

Term  
No. 06-1936 cd

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

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE OF ARGENT MORTGAGE SECURITIES, INC. ASSET-BACKED  
PASS THROUGH CERTIFICATES SERIES 2004-W11, UNDER THE POOLING AND SERVICING AGREEMENT DATED AS OF  
OCTOBER 1, 2004, WITHOUT RE COURSE

vs.

GLORIA KACHMAN  
and OCCUPANTS  
416 Arnold Avenue Rear  
a/k/a 416 Clarion Street  
Clearfield, PA 16830

---

**WRIT OF POSSESSION**

---

Costs

**GOLDBECK, McCAFFERTY, McKEEVER**  
Suite 5000 Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
(215) 825-6319

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TAX PARCEL #: 4.2K08-228-00049

PROPERTY ADDRESS: 416 Arnold Avenue Rear a/k/a 416 Clarion Street, Clearfield, PA 16830