

06-1937-CD
JP Morgan al vs John Doe al

2006-1937-CD
JP Morgan vs John Doe et al

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

ATTORNEY FOR PLAINTIFF

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

FILED *Att'y pd.*
M 11/16/06 85.00
NOV 20 2006 *ccCSHff*
William A. Shaw
Prothonotary/Clerk of Courts

CIVIL ACTION
COMPLAINT IN EJECTMENT

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

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

LAWYERS REFERRAL SERVICE

Pennsylvania Lawyer Referral Service

Pennsylvania Bar Association *May 3, 2007* Document
Reinstated/Reissued to Sheriff/Attorney
for service.

Will A. Shaw
Deputy Prothonotary

100 South Street
PO Box 186
Harrisburg, PA 17108
800-692-7375

AVISO

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

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

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800-692-7375

1. Plaintiff is the corporation or individual named on the caption, and whose address or principal office appears in the caption.
2. Defendant(s) are those named as such on the caption, and occupy the premises (hereinafter "Premises") which address is set forth on the caption.
3. Premises, a legal description of which is attached hereto, was sold at Sheriff's Sale in accordance with law on November 3, 2006, and Plaintiff became owner thereof as a result of being the successful bidder and thus the purchaser at said sale, and remains real owner thereof. (Abstract of Title).
4. The person(s) in possession of Premises are the Defendant(s) herein, and are occupying Premises without right or claim to title.
5. Plaintiff has demanded possession of Premises from Defendant(s) who have refused to deliver up the possession thereof.

WHEREFORE, Plaintiff demands judgment for immediate possession of Premises, issuance of a Writ of Possession and a judgment of its costs and disbursement in this action.

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire
ATTORNEY FOR PLAINTIFF

ALL THAT PARCEL OF LAND IN THE TOWNSHIP OF GREENWOOD, COUNTY OF CLEARFIELD, STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT STATE HIGHWAY LEADING FROM BELLS LANDING TO LUMBER CITY ON LINE OF LOT NOW OR FORMERLY OF JULIA BELL AND/OR GARDNER; THENCE SOUTH ALONG SAID LOT THREE HUNDRED SIXTY-EIGHT (368') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE WEST ALONG LAND NOW OR FORMERLY OF GEARHART, ONE HUNDRED NINETY-SEVEN (197') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE NORTH ALONG LAND OF FORMER GRANTORS THREE HUNDRED (300') FEET TO STATE HIGHWAY; THENCE EAST ALONG SAID HIGHWAY TWO HUNDRED THIRTY-THREE (233') FEET TO THE PLACE OF BEGINNING. CONTAINING 1 ACRE, MORE OR LESS.

THE GAS AND OIL BEING RESERVED IN FORMER DEEDS.

BEING KNOWN AS: 416 LUMBER CITY HIGHWAY
(GREENSWOOD TOWNSHIP)
Mahaffey, PA 15757

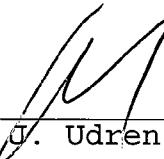
PROPERTY ID NO.: 117-E11-000-00030

TITLE TO SAID PREMISES IS VESTED IN DELBERT C. KLINE, A SINGLE INDIVIDUAL AND GUY R. KLINE, AN INDIVIDUAL, AS JOINT TENANTS WITH THE RIGHT OF SURVIVORSHIP BY DEED FROM DELBERT C. KLINE DATED 6/5/98 RECORDED 6/7/98 IN DEED BOOK 1940 PAGE 39.

VERIFICATION

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

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire

DATED: November 10, 2006

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 2 Services

Sheriff Docket #

102171

JPMORGAN CHASE BANK, Trustee

Case #

06-1937-CD

vs.

JOHN DOE and/or Tenant/Occupant

TYPE OF SERVICE COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW March 05, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO JOHN DOE, DEFENDANT. ATTEMPTED, NOT HOME.

SERVED BY: /

FILED
0/8:30 AM
MAR 06 2007

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 2 of 2 Services

Sheriff Docket #

102171

JPMORGAN CHASE BANK, Trustee

Case # 06-1937-CD

vs.

JOHN DOE and/or Tenant/Occupant

TYPE OF SERVICE COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW March 05, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO TENANT/OCCUPANT, DEFENDANT. ATTEMPTED, NOT HOME.

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102171
NO: 06-1937-CD
SERVICES 2
COMPLAINT IN EJECTMENT

PLAINTIFF: JPMORGAN CHASE BANK, Trustee

vs.

DEFENDANT: JOHN DOE and/or Tenant/Occupant

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	76174	20.00
SHERIFF HAWKINS	UDREN	76174	63.55

Sworn to Before Me This

So Answers,

____ Day of _____ 2007

Chester A. Hawkins
by Marlyn Harris
Chester A. Hawkins
Sheriff

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COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

I hereby certify this to be a true
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NOV 20 2006

Attest.

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AVISO

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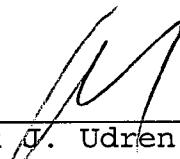
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Mark J. Udren, Esquire

DATED: November 10, 2006

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COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. *06-1937-CD*

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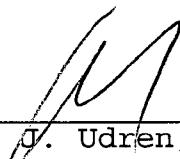
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Mark J. Udren, Esquire

DATED: November 10, 2006

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BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
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JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
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9350 Waxie Way
San Diego, CA 92123
Plaintiff

v.
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Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

FILED
MARCH 27 2007
NOCC
William A. Shaw
Prothonotary/Clerk of Courts

CERTIFICATE OF SERVICE

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

Regular First Class Mail

Certified Mail

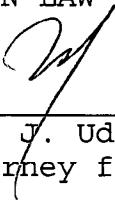
Other

TO: John Doe
416 Lumber City Highway
Mahaffey, PA 15757

Tenant/Occupant
416 Lumber City Highway
Mahaffey, PA 15757

Dated: March 26, 2007

UDREN LAW OFFICES, P.C.


Mark J. Udren, Esquire
Attorney for Plaintiff

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

John Lee
446 number City Highway
Mahaffey (Grandview Two) PA 15257

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

Great/Vacant
446 number City Highway
Mahaffey (Grandview Two) PA 15257

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

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

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

PENNSYLVANIA OFFICE
215-568-9500

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PLEASE RESPOND TO NEW JERSEY OFFICE

March 26, 2007

John Doe
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757

Re: JPMorgan Chase Bank as Trustee (MERS is acting/has acted as the agent for the real party in interest or beneficial owner)
vs.
John Doe, et al.
Clearfield County, CCP, No. 06-1937-CD

Dear Defendant:

In connection with the above captioned matter, enclosed you will find a copy of the Motion for Alternate Service, the original of which has been sent for filing with the Court.

THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Should you have any questions, please contact our office.

Sincerely yours,

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

/dh
Enclosure

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ALAN M. MINATO***
***ADMITTED NJ, PA, FL**
****ADMITTED PA**
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TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

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March 26, 2007

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ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

O R D E R

AND NOW, this day of , 20 , upon
consideration of Plaintiff's Motion For Special Service, it is
hereby ORDERED that service of the Complaint in Ejectment and all
subsequent pleadings on Defendant(s), shall be complete when
Plaintiff or its counsel or agent has mailed true and correct
copies of the Complaint in Ejectment and all subsequent pleadings
by certified mail and regular mail to the address at which
Plaintiff is seeking possession, and also by posting the premises
at which Plaintiff is seeking possession:

416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757

BY THE COURT:

J.

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

ATTORNEY FOR PLAINTIFF

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
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9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

MOTION FOR SPECIAL SERVICE PURSUANT
TO SPECIAL ORDER OF COURT

Plaintiff, by its counsel, Mark J. Udren, Esquire, moves this Honorable Court for an Order directing service of the Complaint in Ejectment upon Defendant(s), by regular mail and certified mail and also by posting the premises at which Plaintiff is seeking possession, and in support thereof avers the following:

1. Premises located at 416 Lumber City Highway, Mahaffey (Greenswood Twp.), PA 15757 was sold at Sheriff's Sale in accordance with law on November 3, 2006, and Plaintiff became owner thereof as a result of being the successful bidder and thus the purchaser at said sale, and remains real owner thereof.

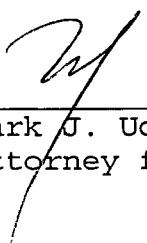
2. The person(s) in possession of Premises are either the former owners/ Defendant(s) or are unknown occupants, and are occupying Premises without right or claim to title.

3. Process was unable to be served upon named Defendant(s)/Occupants at the said Premises. A copy of the Return of Service is attached hereto as Exhibit "A".

4. Plaintiff wishes to give notice by service of the Complaint in Ejectment as requested hereafter, to the named Defendant(s) and/or occupants, whoever they may be.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter an Order pursuant to Pa.R.C.P. 430 directing service of the Complaint in Ejectment by regular mail and certified mail upon said Defendant(s) and also by posting the premises at which Plaintiff is seeking possession.

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire
Attorney for Plaintiff

Exhibit "A"

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 2 Services

Sheriff Docket # 102171

JPMORGAN CHASE BANK, Trustee

Case # 06-1937-CD

VS.

JOHN DOE and/or Tenant/Occupant

TYPE OF SERVICE COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW March 06, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO JOHN DOE, DEFENDANT. ATTEMPTED, NOT HOME.

SERVED BY: /

FILED
0/8:30 AM
MAR 06 2007

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 2 of 2 Services

Sheriff Docket # 102171

JPMORGAN CHASE BANK, Trustee

Case # 06-1937-CD

vs.

JOHN DOE and/or Tenant/Occupant

TYPE OF SERVICE COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW March 05, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO TENANT/OCCUPANT, DEFENDANT. ATTEMPTED, NOT HOME.

SERVED BY: /

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

ATTORNEY FOR PLAINTIFF

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party in
interest or beneficial owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
NO. 06-1937-CD

v.

John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

MEMORANDUM OF LAW

Pennsylvania Rule of Civil Procedure 430(a) provides for alternate service by Order of Court when a Defendant cannot be served or found. In the usual circumstances, an Affidavit setting forth the efforts taken to locate the Defendant(s) accompanies this Motion.

Here, however, in this Action in Ejectment, the concern is not so much to serve the named Defendant(s), but rather to serve the person(s) actually occupying the premises. Searching out and locating former owners could very well not accomplish the desired goal.

Accordingly, Plaintiff has requested this Honorable Court to allow service by the means most likely to give notice to the named Defendant(s)/occupant(s), whoever they may be.

WHEREFORE, Plaintiff respectfully request service of the Complaint in Ejectment upon Defendant(s) by regular mail and certified mail and also by posting the premises at which Plaintiff is seeking possession.

UDREN LAW OFFICES, P.C.


Mark J. Udren, Esquire
Attorney for Plaintiff

VERIFICATION

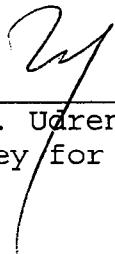
Mark J. Udren, Esquire, hereby states that he is the Attorney for the Plaintiff in this action, that he is authorized to take this Verification, and that the statements made in the foregoing MOTION FOR SPECIAL SERVICE PURSUANT TO SPECIAL ORDER OF COURT are true and correct to the best of his knowledge,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

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

UDREN LAW OFFICES, P.C.

Date: March 26, 2007

Mark J. Udren, Esquire
Attorney for Plaintiff



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

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

VERIFICATION WITH REGARD TO GOOD FAITH
REASONABLE INVESTIGATION

1. The present action is in Ejectment. Inability to effect service presents unique issues.
2. The Defendants that have been named may be the former owners/mortgagors who have been foreclosed upon.
3. The former owners/mortgagors may not be the present occupants of the foreclosed premises.
4. The Sheriff/process server has been unable to serve the present occupants of the premises.
5. Plaintiff wishes to give proper notice to the actual occupant and if former owner/mortgagor is not the occupant, obtaining a standard reasonable investigation will not serve the intended purpose.
6. Locating the former owner/mortgagor at a remote location does not solve the service problem in an Ejectment action with regard to the actual occupant.
7. If occupant is not the former owner/mortgagor, no name or social security number is available to Plaintiff to order a

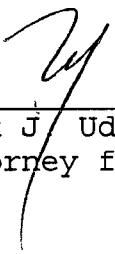
Reasonable Investigation.

8. The present whereabouts of the occupants of the premises can be nowhere else but at the premises itself and therefore, additional reasonable investigation of the whereabouts of the occupants would serve no purpose.

For the reasons stated, verifier requests this Honorable Court to accept this Verification in place of a Reasonable Investigation.

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

UDREN LAW OFFICES, P.C.


Mark J. Udren, Esquire
Attorney for Plaintiff

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

ATTORNEY FOR PLAINTIFF

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party in
interest or beneficial owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

V.

John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)

CERTIFICATE OF SERVICE

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

x

Regular First Class Mail

Certified Mail

Other

TO: John Doe
416 Lumber City Highway
Mahaffey, PA 15757

Tenant/Occupant
416 Lumber City Highway
Mahaffey, PA 15757

UDREN LAW OFFICES, P.C.

Dated: March 26, 2007

Mark J. Udren, Esquire
Attorney for Plaintiff

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

John Doe
446 number City Highway
Mahaffey (Greenwood Twp) PA 15757

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

Frank D'Avanzo
446 number City Highway
Mahaffey (Greenwood Twp) PA 15757

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

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

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

PENNSYLVANIA OFFICE
215-568-9500

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PLEASE RESPOND TO NEW JERSEY OFFICE

March 26, 2007

John Doe
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757

Re: JPMorgan Chase Bank as Trustee (MERS is acting/has acted as the agent for the real party in interest or beneficial owner)
vs.
John Doe, et al.
Clearfield County, CCP, No. 06-1937-CD

Dear Defendant:

In connection with the above captioned matter, enclosed you will find a copy of the Motion for Alternate Service, the original of which has been sent for filing with the Court.

THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Should you have any questions, please contact our office.

Sincerely yours,

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

/dh
Enclosure

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

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

PENNSYLVANIA OFFICE
215-568-9500

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

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PLEASE RESPOND TO NEW JERSEY OFFICE

March 26, 2007

Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757

Re: JPMorgan Chase Bank as Trustee (MERS is acting/has acted as the agent for the real party in interest or beneficial owner)
vs.
John Doe, et al.
Clearfield County, CCP, No. 06-1937-CD

Dear Defendant:

In connection with the above captioned matter, enclosed you will find a copy of the Motion for Alternate Service, the original of which has been sent for filing with the Court.

THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Should you have any questions, please contact our office.

Sincerely yours,

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

/dh
Enclosure

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

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

v.

John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

FILED ^{1CC}
APR 17 2007 ^{ATTY}
Udren

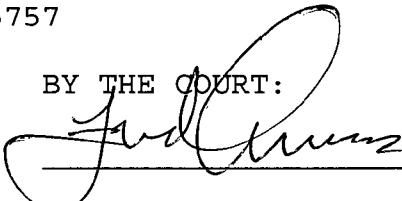
W.A. Shaw
Prothonotary/Clerk of Courts

O R D E R

AND NOW, this 30th day of March, 2007, upon
consideration of Plaintiff's Motion For Special Service, it is
hereby ORDERED that service of the Complaint in Ejectment and all
subsequent pleadings on Defendant(s), shall be complete when
Plaintiff or its counsel or agent has mailed true and correct
copies of the Complaint in Ejectment and all subsequent pleadings
by certified mail and regular mail to the address at which
Plaintiff is seeking possession, and also by posting the premises
at which Plaintiff is seeking possession:

416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757

BY THE COURT:


J.

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
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JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

v.

John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

FILED
MARCH 27 2007
60
William A. Shaw
Prothonotary/Clerk of Courts
No CC

MOTION FOR SPECIAL SERVICE PURSUANT
TO SPECIAL ORDER OF COURT

Plaintiff, by its counsel, Mark J. Udren, Esquire, moves this Honorable Court for an Order directing service of the Complaint in Ejectment upon Defendant(s), by regular mail and certified mail and also by posting the premises at which Plaintiff is seeking possession, and in support thereof avers the following:

1. Premises located at 416 Lumber City Highway, Mahaffey (Greenswood Twp.), PA 15757 was sold at Sheriff's Sale in accordance with law on November 3, 2006, and Plaintiff became owner thereof as a result of being the successful bidder and thus the purchaser at said sale, and remains real owner thereof.

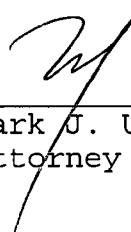
2. The person(s) in possession of Premises are either the former owners/ Defendant(s) or are unknown occupants, and are occupying Premises without right or claim to title.

3. Process was unable to be served upon named Defendant(s)/Occupants at the said Premises. A copy of the Return of Service is attached hereto as Exhibit "A".

4. Plaintiff wishes to give notice by service of the Complaint in Ejectment as requested hereafter, to the named Defendant(s) and/or occupants, whoever they may be.

WHEREFORE, Plaintiff respectfully requests this Honorable Court enter an Order pursuant to Pa.R.C.P. 430 directing service of the Complaint in Ejectment by regular mail and certified mail upon said Defendant(s) and also by posting the premises at which Plaintiff is seeking possession.

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire
Attorney for Plaintiff

Exhibit "A"

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 2 Services Sheriff Docket # **102171**
JPMORGAN CHASE BANK, Trustee Case # **06-1937-CD**

vs.

JOHN DOE and/or Tenant/Occupant

TYPE OF SERVICE COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW March 05, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO JOHN DOE, DEFENDANT. ATTEMPTED, NOT HOME.

SERVED BY: /

FILED
03/06/2007
MAR 06 2007

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 2 of 2 Services

Sheriff Docket # **102171**

JPMORGAN CHASE BANK, Trustee

Case # **06-1937-CD**

vs.

JOHN DOE and/or Tenant/Occupant

TYPE OF SERVICE COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW March 05, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO TENANT/OCCUPANT, DEFENDANT. ATTEMPTED, NOT HOME.

SERVED BY: /

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

ATTORNEY FOR PLAINTIFF

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

VERIFICATION WITH REGARD TO GOOD FAITH
REASONABLE INVESTIGATION

1. The present action is in Ejectment. Inability to effect service presents unique issues.
2. The Defendants that have been named may be the former owners/mortgagors who have been foreclosed upon.
3. The former owners/mortgagors may not be the present occupants of the foreclosed premises.
4. The Sheriff/process server has been unable to serve the present occupants of the premises.
5. Plaintiff wishes to give proper notice to the actual occupant and if former owner/mortgagor is not the occupant, obtaining a standard reasonable investigation will not serve the intended purpose.
6. Locating the former owner/mortgagor at a remote location does not solve the service problem in an Ejectment action with regard to the actual occupant.
7. If occupant is not the former owner/mortgagor, no name or social security number is available to Plaintiff to order a

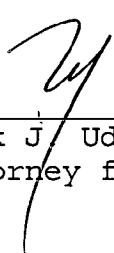
Reasonable Investigation.

8. The present whereabouts of the occupants of the premises can be nowhere else but at the premises itself and therefore, additional reasonable investigation of the whereabouts of the occupants would serve no purpose.

For the reasons stated, verifier requests this Honorable Court to accept this Verification in place of a Reasonable Investigation.

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

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire
Attorney for Plaintiff

VERIFICATION

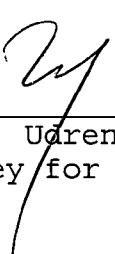
Mark J. Udren, Esquire, hereby states that he is the Attorney for the Plaintiff in this action, that he is authorized to take this Verification, and that the statements made in the foregoing MOTION FOR SPECIAL SERVICE PURSUANT TO SPECIAL ORDER OF COURT are true and correct to the best of his knowledge,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

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

UDREN LAW OFFICES, P.C.

Date: March 26, 2007

Mark J. Udren, Esquire
Attorney for Plaintiff



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

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
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in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

v.

John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY:

Kindly reinstate the Complaint on the above-captioned matter.

DATE: April 24, 2007

UDREN LAW OFFICES, P.C.

Mark J. Udren, Esquire
ATTORNEY FOR PLAINTIFF

FILED pd \$7.00 Atty
m/110 Lm 2 reinstated
MAY 03 2007 Complaints to
Shff *jm* Procease
ICC to Atty
William A. Shaw
Prothonotary/Clerk of Courts

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

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
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interest or beneficial owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

FILED NO
MAY 09 2007
IN

William A. Shaw
Prothonotary/Clerk of Courts

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)

Defendant(s)

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

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

DATE MAILED: *May 7, 2007*

John Doe
Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757

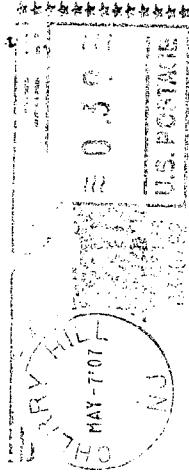
I verify that the statements made herein are true and correct and I understand that false statements made herein are subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Dated: *May 7, 2007*

UDREN LAW OFFICES, P.C.

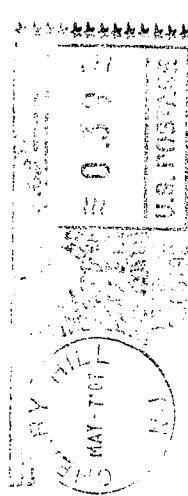
M
Mark J. Udren, Esquire
Attorney for Plaintiff

UDDEN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
CHERRY HILL, NJ 08003



John Doe
4111 Sumner City Hwy
Mahaffey PA 15757

UDDEN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
CHERRY HILL, NJ 08003



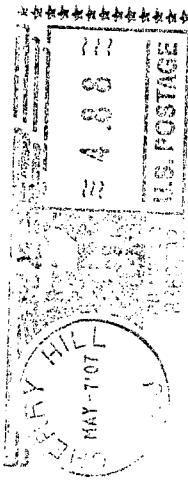
John Doe
4111 Sumner City Hwy
Mahaffey PA 15757



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



7005 1160 0002 3912 1585



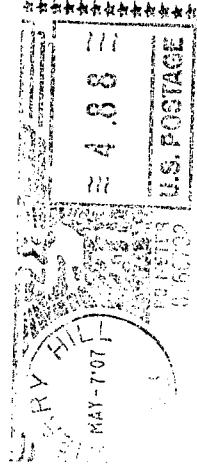
John Doe Harry
4110 humboldt City Harry
Mahaffey PA 15757



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



7005 1160 0002 3912 1592



Frank / Occupant
4110 humboldt City Harry
Mahaffey PA 15757

SENDER COMPLETE THIS SECTION

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

1. Article Addressed to:

Smart/Corporation

444 Kumbh City Hwy
Mahaffey PA 15757

2. **7005 1160 0002 3912 1592**

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

SENDER COMPLETE THIS SECTION

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

1. Article Addressed to:

John Doe

444 Kumbh City Hwy
Mahaffey PA 15757

2. **7005 1160 0002 3912 1585**

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

SENDER COMPLETE THIS SECTION

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

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

- 3. Service Type Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.
- 4. Restricted Delivery? (Extra Fee) Yes

COMPLETE THIS SECTION		
A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee		
X		
B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery		
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No		
1. Article Addressed to:		
<i>Smart/Corporation</i>		
2. 7005 1160 0002 3912 1592		
PS Form 3811, February 2004 Domestic Return Receipt		
102595-02-M-1540		

COMPLETE THIS SECTION		
A. Signature <input type="checkbox"/> Agent <input type="checkbox"/> Addressee		
X		
B. Received by (Printed Name) <input type="checkbox"/> C. Date of Delivery		
D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No		
1. Article Addressed to:		
<i>John Doe</i>		
2. 7005 1160 0002 3912 1585		
PS Form 3811, February 2004 Domestic Return Receipt		
102595-02-M-1540		

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

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

v.

John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

FILED

JUN 18 2007
WY 40: 50/1
William A. Shaw
Prothonotary/Clerk of Courts
NOTICE TO
DEPT.?

PRAECIPE FOR JUDGMENT IN EJECTMENT

TO THE PROTHONOTARY:

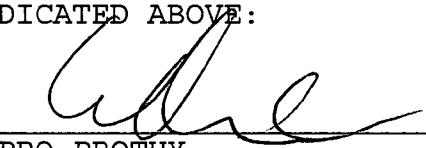
Kindly enter Judgment in Ejectment in favor of the Plaintiff and against the Defendant(s), John Doe and Tenant/Occupant, for possession of the premises appearing in the caption, for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof.

I hereby certify that notice has been given in accordance with Rule 237.1, a copy of which is attached hereto.


Mark J. Udren, Esquire
Attorney for Plaintiff

DEFAULT JUDGMENT ENTERED AS INDICATED ABOVE:

DATE: 6-18-07


PRO PROTHY

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

ATTORNEY FOR PLAINTIFF

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.

John Doe
and Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

TO: John Doe
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757

DATE of Notice: June 4, 2007

IMPORTANT NOTICE

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

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

NOTIFICACION IMPORTANTE

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

SERVICIO DE REFERENCIA LEGAL
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800-692-7375



Mark J. Udren, Esquire
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620

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

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

v.

John Doe
and Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)

Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

TO: Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757

DATE of Notice: June 4, 2007

IMPORTANT NOTICE

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Mark J. Udrén, Esquire

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL NEW JERSEY 08003-3620

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

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

VERIFICATION OF NON-MILITARY SERVICE

Mark J. Udren, Esquire, hereby verifies that he is Attorney for the Plaintiff in the above captioned matter, and that on information and belief, he has knowledge of the following facts, to wit:

That the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Servicemembers Civil Relief Act of 1940, as amended, and that the age and last known residence and employment of each Defendant are as follows:

Defendant: John Doe
Age: Over 18
Residence: As captioned above
Employment: Unknown

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

DATED: June 15, 2007


Mark J. Udren, Esquire

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

ATTORNEY FOR PLAINTIFF

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
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in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

TO: John Doe
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757

NOTICE

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

6-18-01
6-18-01
Prothonotary

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

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:
ATTORNEY MARK J. UDREN, ESQUIRE
At this telephone number: 856-669-5400.

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003
856-669-5400
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San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

TO: Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are
hereby notified that a Judgment has been entered against you in the
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lul 6-18-07
Prothonotary

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

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At this telephone number: 856-669-5400.

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v.

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Mahaffey (Greenswood Twp.), PA
15757 (Premises)

Defendant(s)

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

FILED

JUN 18 2007

W. A. Shaw
William A. Shaw
Prothonotary/Clerk of Courts

to CEN.

6 WANTS TO

STAY

PRAECIPE FOR WRIT OF POSSESSION

TO THE PROTHONOTARY:

Issue Writ of Possession in the above matter, for possession of the property captioned under Defendants above, a description of which is attached hereto:



Mark J. Udren, Esquire
Attorney for Plaintiff

ALL THAT PARCEL OF LAND IN THE TOWNSHIP OF GREENWOOD, COUNTY OF CLEARFIELD, STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT STATE HIGHWAY LEADING FROM BELLS LANDING TO LUMBER CITY ON LINE OF LOT NOW OR FORMERLY OF JULIA BELL AND/OR GARDNER; THENCE SOUTH ALONG SAID LOT THREE HUNDRED SIXTY-EIGHT (368') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE WEST ALONG LAND NOW OR FORMERLY OF GEARHART, ONE HUNDRED NINETY-SEVEN (197') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE NORTH ALONG LAND OF FORMER GRANTORS THREE HUNDRED (300') FEET TO STATE HIGHWAY; THENCE EAST ALONG SAID HIGHWAY TWO HUNDRED THIRTY-THREE (233') FEET TO THE PLACE OF BEGINNING. CONTAINING 1 ACRE, MORE OR LESS.

THE GAS AND OIL BEING RESERVED IN FORMER DEEDS.

BEING KNOWN AS: 416 LUMBER CITY HIGHWAY
(GREENSWOOD TOWNSHIP)
Mahaffey, PA 15757

PROPERTY ID NO.: 117-E11-000-00030

TITLE TO SAID PREMISES IS VESTED IN DELBERT C. KLINE, A SINGLE INDIVIDUAL AND GUY R. KLINE, AN INDIVIDUAL, AS JOINT TENANTS WITH THE RIGHT OF SURVIVORSHIP BY DEED FROM DELBERT C. KLINE DATED 6/5/98 RECORDED 6/7/98 IN DEED BOOK 1940 PAGE 39.

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

ATTORNEY FOR PLAINTIFF

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757
Defendant(s)

WRIT OF POSSESSION

TO THE SHERIFF OF Clearfield COUNTY:

(1) To satisfy the judgment for possession in the above matter
you are directed to deliver possession of the following property
to:

JPMorgan Chase Bank as Trustee (MERS is acting/has acted as the
agent for the real party in interest or beneficial owner)
(See Legal Description Attached)

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

Prothonotary
By 
Clerk

Date June 18, 2007

COURT OF COMMON PLEAS

NO. 06-1937-CD

JPMorgan Chase Bank as Trustee (MERS is acting/has acted as the agent for the real party in interest or beneficial owner)
Plaintiff

VS.

John Doe
and/or Tenant/Occupant
Defendants

WRIT OF POSSESSION

Costs
Prothy Pd.
Judgment Fee
Satisfaction Fee

M

Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620
I.D. #04302
ATTORNEY FOR PLAINTIFF

Address: 416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757
WHERE PAPERS MAY BE SERVED

ALL THAT PARCEL OF LAND IN THE TOWNSHIP OF GREENWOOD, COUNTY OF CLEARFIELD, STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT STATE HIGHWAY LEADING FROM BELLS LANDING TO LUMBER CITY ON LINE OF LOT NOW OR FORMERLY OF JULIA BELL AND/OR GARDNER; THENCE SOUTH ALONG SAID LOT THREE HUNDRED SIXTY-EIGHT (368') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE WEST ALONG LAND NOW OR FORMERLY OF GEARHART, ONE HUNDRED NINETY-SEVEN (197') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE NORTH ALONG LAND OF FORMER GRANTORS THREE HUNDRED (300') FEET TO STATE HIGHWAY; THENCE EAST ALONG SAID HIGHWAY TWO HUNDRED THIRTY-THREE (233') FEET TO THE PLACE OF BEGINNING. CONTAINING 1 ACRE, MORE OR LESS.

THE GAS AND OIL BEING RESERVED IN FORMER DEEDS.

BEING KNOWN AS: 416 LUMBER CITY HIGHWAY
(GREENWOOD TOWNSHIP)
Mahaffey, PA 15757

PROPERTY ID NO.: 117-E11-000-00030

TITLE TO SAID PREMISES IS VESTED IN DELBERT C. KLINE, A SINGLE INDIVIDUAL AND GUY R. KLINE, AN INDIVIDUAL, AS JOINT TENANTS WITH THE RIGHT OF SURVIVORSHIP BY DEED FROM DELBERT C. KLINE DATED 6/5/98 RECORDED 6/7/98 IN DEED BOOK 1940 PAGE 39.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102916
NO: 06-1937-CD
SERVICE # 1 OF 1
WRIT OF POSSESSION & ORDER

PLAINTIFF: JP MORGAN CHASE BANK as Trustee
vs.
DEFENDANT: JOHN DOE and/or Tenant/Occupant

SHERIFF RETURN

NOW, June 25, 2007 AT 9:54 AM SERVED THE WITHIN WRIT OF POSSESSION & ORDER ON JOHN DOE and/or Tenant/occupant DEFENDANT AT 416 LUMBER CITY HIGHWAY (GREENWOOD TWP), MAHAFFEY, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO POSTED ON PROPERTY, A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF POSSESSION & ORDER AND MADE KNOWN THE CONTENTS THEREOF. LOCKOUT PERFORMED 6/29/07 @ 10:00am

SERVED BY: DAVIS / MORGILLO

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	UDREN	91988	10.00
SHERIFF HAWKINS	UDREN	91988	90.00

FILED
9/2/07
JUL 02 2007
WAS
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

____ Day of _____ 2007

So Answers,

Chester A. Hawkins
by Marilyn Hasko
Chester A. Hawkins
Sheriff

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003
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9350 Waxie Way
San Diego, CA 92123
Plaintiff

v.

John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757

Defendant(s)

ATTORNEY FOR PLAINTIFF
COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

WRIT OF POSSESSION

TO THE SHERIFF OF Clearfield COUNTY:

(1) To satisfy the judgment for possession in the above matter
you are directed to deliver possession of the following property
to:

JPMorgan Chase Bank as Trustee (MERS is acting/has acted as the
agent for the real party in interest or beneficial owner)
(See Legal Description Attached)

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

Received this writ this 18 day
of June A.D. 2007
At 3:00 A.M./P.M.

Prothonotary
C. Miller
By C. Miller
Clerk

Date June 18, 2007

Chuter N Hawkins
Sheriff by Marilyn Harker

COURT OF COMMON PLEAS

NO. 06-1937-CD

JPMorgan Chase Bank as Trustee (MERS is acting/has acted as the agent for the real party in interest or beneficial owner)
Plaintiff

VS.

John Doe
and/or Tenant/Occupant
Defendants

WRIT OF POSSESSION

Costs
Prothly Pd.
Judgment Fee
Satisfaction Fee

Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620
I.D. #04302
ATTORNEY FOR PLAINTIFF

Address: 416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757
WHERE PAPERS MAY BE SERVED

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Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757
Defendant(s)

WRIT OF POSSESSION

TO THE SHERIFF OF Clearfield COUNTY:

(1) To satisfy the judgment for possession in the above matter
you are directed to deliver possession of the following property
to:

JPMorgan Chase Bank as Trustee (MERS is acting/has acted as the
agent for the real party in interest or beneficial owner)
(See Legal Description Attached)

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

Received this writ this 18 day
of June A.D. 2007
At 3:00 A.M. (P.M.)

Prothonotary
By C. Schell
Clerk

Date June 18, 2007

Chet A. Hawley
Sheriff
by Marlyn Hart

COURT OF COMMON PLEAS

NO. 06-1937-CD

JPMorgan Chase Bank as Trustee (MERS is acting/has acted as the agent for the real party in interest or beneficial owner)
Plaintiff

vs.

John Doe
and/or Tenant/Occupant
Defendants

WRIT OF POSSESSION

Costs
Prothly Pd.
Judgment Fee
Satisfaction Fee

Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620
I.D. #04302
ATTORNEY FOR PLAINTIFF

Address: 416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA 15757
WHERE PAPERS MAY BE SERVED

ALL THAT PARCEL OF LAND IN THE TOWNSHIP OF GREENWOOD, COUNTY OF CLEARFIELD, STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT STATE HIGHWAY LEADING FROM BELLS LANDING TO LUMBER CITY ON LINE OF LOT NOW OR FORMERLY OF JULIA BELL AND/OR GARDNER; THENCE SOUTH ALONG SAID LOT THREE HUNDRED SIXTY-EIGHT (368') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE WEST ALONG LAND NOW OR FORMERLY OF GEARHART, ONE HUNDRED NINETY-SEVEN (197') FEET TO A POST ON LAND OF FORMER GRANTORS; THENCE NORTH ALONG LAND OF FORMER GRANTORS THREE HUNDRED (300') FEET TO STATE HIGHWAY; THENCE EAST ALONG SAID HIGHWAY TWO HUNDRED THIRTY-THREE (233') FEET TO THE PLACE OF BEGINNING. CONTAINING 1 ACRE, MORE OR LESS.

THE GAS AND OIL BEING RESERVED IN FORMER DEEDS.

BEING KNOWN AS: 416 LUMBER CITY HIGHWAY
(GREENSWOOD TOWNSHIP)
Mahaffey, PA 15757

PROPERTY ID NO.: 117-E11-000-00030

TITLE TO SAID PREMISES IS VESTED IN DELBERT C. KLINE, A SINGLE INDIVIDUAL AND GUY R. KLINE, AN INDIVIDUAL, AS JOINT TENANTS WITH THE RIGHT OF SURVIVORSHIP BY DEED FROM DELBERT C. KLINE DATED 6/5/98 RECORDED 6/7/98 IN DEED BOOK 1940 PAGE 39.

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

JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
the agent for the real party
in interest or beneficial
owner)
9350 Waxie Way
San Diego, CA 92123
Plaintiff

v.

John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757

Defendant(s)

ATTORNEY FOR PLAINTIFF

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At 3:00 A.M. P.M.

Clinton A. Hawley
Sheriff by Maury Harr

Prothonotary
W. S. Hall
By _____
Clerk

Date June 18, 2007

COURT OF COMMON PLEAS

NO. 06-1937-CD

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Plaintiff

VS.

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and/or Tenant/Occupant
Defendants

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Costs
Prothly Pd.
Judgment Fee
Satisfaction Fee

M

Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
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JPMorgan Chase Bank as Trustee
(MERS is acting/has acted as
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9350 Waxie Way
San Diego, CA 92123
Plaintiff

v.
John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757
Defendant(s)

ATTORNEY FOR PLAINTIFF

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CIVIL DIVISION
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At 3:00 A.M. (P.M.)

Chet A. Hawkins
Sheriff
by Maury Hahn

Prothonotary
W. Hahn
By _____
Clerk

Date June 18, 2007

COURT OF COMMON PLEAS

NO. 06-1937-CD

JPMorgan Chase Bank as Trustee (MERS is acting/has acted as the agent for the real party in interest or beneficial owner)
Plaintiff

vs.

John Doe
and/or Tenant/Occupant
Defendants

WRIT OF POSSESSION

Costs
Prothly Pd.
Judgment Fee
Satisfaction Fee



Mark J. Udren, ESQUIRE
UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620
I.D. #04302
ATTORNEY FOR PLAINTIFF

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Mahaffey (Greenswood Twp.), PA 15757
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102758
NO: 06-1937-CD
SERVICE # 1 OF 2
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: JPMORGAN CHASE BANK as Trustee
vs.
DEFENDANT: JOHN DOE and/or TENANT/OCCUPANT

SHERIFF RETURN

NOW, May 11, 2007 AT 10:14 AM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416
LUMBER CITY HIGHWAY (GREENWOOD TWP.), MAHAFFEY, CLEARFIELD COUNTY, PENNSYLVANIA.
(JOHN DOE - Kline)
SERVED BY: DAVIS / MORGILLO

FILED
03/20/07
OCT 03 2007
LSN

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102758
NO: 06-1937-CD
SERVICE # 2 OF 2
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: JPMORGAN CHASE BANK as Trustee
vs.
DEFENDANT: JOHN DOE and/or TENANT/OCCUPANT

SHERIFF RETURN

NOW, May 11, 2007 AT 10:14 AM POSTED THE WITHIN COMPLAINT IN EJECTMENT & ORDER AT 416
LUMBER CITY HIGHWAY (GREENWOOD TWP.), MAHAFAY, CLEARFIELD COUNTY, PENNSYLVANIA.
(TENANT/OCCUPANT)

SERVED BY: DAVIS / MORGILLO

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102758
NO: 06-1937-CD
SERVICES 2
COMPLAINT IN EJECTMENT & ORDER

PLAINTIFF: JPMORGAN CHASE BANK as Trustee
vs.
DEFENDANT: JOHN DOE and/or TENANT/OCCUPANT

SHERIFF RETURN

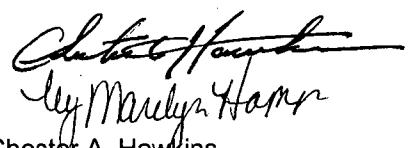
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	88254	20.00
SHERIFF HAWKINS	UDREN	88254	36.73

Sworn to Before Me This

____ Day of _____ 2007

So Answers,


Chester A. Hawkins
Sheriff

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
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ATTORNEY FOR PLAINTIFF

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San Diego, CA 92123
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 06-1937-CD

v.

John Doe
and/or Tenant/Occupant
416 Lumber City Highway
Mahaffey (Greenswood Twp.), PA
15757 (Premises)
Defendant(s)

MEMORANDUM OF LAW

Pennsylvania Rule of Civil Procedure 430(a) provides for alternate service by Order of Court when a Defendant cannot be served or found. In the usual circumstances, an Affidavit setting forth the efforts taken to locate the Defendant(s) accompanies this Motion.

Here, however, in this Action in Ejectment, the concern is not so much to serve the named Defendant(s), but rather to serve the person(s) actually occupying the premises. Searching out and locating former owners could very well not accomplish the desired goal.

Accordingly, Plaintiff has requested this Honorable Court to allow service by the means most likely to give notice to the named Defendant(s)/occupant(s), whoever they may be.

WHEREFORE, Plaintiff respectfully request service of the Complaint in Ejectment upon Defendant(s) by regular mail and certified mail and also by posting the premises at which Plaintiff is seeking possession.

UDREN LAW OFFICES, P.C.

Mark J. Udren, Esquire
Attorney for Plaintiff