

06-2013-CD
Federal Nat'l vs Tina Myers

20137CFC

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
CIVIL DIVISION

Federal National Mortgage Association

Docket# 06-2013-CD

v.

Complaint in Ejectment

Tina R. Myers or occupants

Ejectment

CERTIFICATE OF LOCATION:

I hereby certify that the
Location of the Real Estate
Which is the subject of this
Litigation is:

L 6 Potter Street
Karthaus, PA 16845

Counsel of Record for
Plaintiff:

Martha E. VonRosenstiel
Attorney I.D.# 52634

649 South Avenue, Unit 7
Secane, PA 19018
(610) 328-2887
(610) 328-2649 – fax

BY:

Martha E. Von Rosenstiel, Esquire

FILED pd \$85.00 Atty
M/11:30 am ICC Atty
DEC 04 2006 ICC Shff
Wm

William A. Shaw
Prothonotary/Clerk of Courts

Martha E. Von Rosenstiel, P.C.

Martha E. Von Rosenstiel

649 South Avenue, Unit 7

Secane, PA 19018

610-328-2887

Attorney I.D.# 52634

FEDERAL NATIONAL MORTGAGE
ASSOCIATION

1900 MARKET STREET SUITE 800

PHILADELPHIA PA 19103

PLAINTIFF

VS.

TINA R. MYERS OR OCCUPANTS

L 6 POTTER STREET

KARTHAUS PA 16845

DEFENDANT

Attorney for Plaintiff

: COURT OF COMMON PLEAS
: CLEARFIELD COUNTY

: CASE NO:

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 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 ELEGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

ADVISO

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LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO VAYA EN PERSONA O TELEFONA A LA OFICINA ESCRITA ABAJO . ESTA OFICINA LE PUEDE PROVEER INFORMACION SOBRE COMO CONTRATAR A UN ABOGADO. SI USTED NO TIENE EL DINERO SUFICIENTE PARA CONTRATAR A UN ABOGADO, LE PODEMOS DAR INFORMACION SOBRE AGENCIAS QUE PROVEEN SERVICIO LEGAL A PERSONAS ELEGIBLE PARA SERVICIOS A COSTO REDUCIDO O GRATUITO.

Lawyer Referral Service:

Pennsylvania Lawyer Referral Service

(800) 692-7375

Pennsylvania Bar Association

P.O. Box 186, Harrisburg, PA 17108

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649 South Avenue, Unit 7
Secane, PA 19018
610-328-2887
Attorney I.D.# 52634

Attorney for Plaintiff

FEDERAL NATIONAL MORTGAGE ASSOCIATION	:	COURT OF COMMON PLEAS
1900 MARKET STREET SUITE 800	:	CLEARFIELD COUNTY
PHILADELPHIA PA 19103	:	
PLAINTIFF	:	
VS.	:	CASE NO:
TINA R. MYERS OR OCCUPANTS	:	
L 6 POTTER STREET	:	
KARTHAUS PA 16845	:	
DEFENDANT	:	

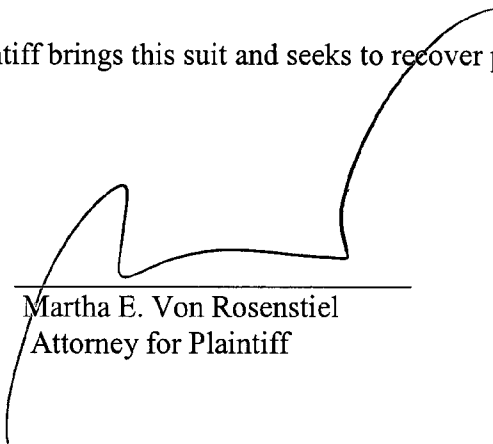
CIVIL ACTION – EJECTMENT

1. Plaintiff, Federal National Mortgage Association, is the owner of premises known as L 6 Potter Street Karthaus PA 16845, more fully described in the legal description attached hereto as Exhibit I.

2. Plaintiff claims title to the aforesaid property by virtue of a Sheriff's sale held on November 03, 2006, in the execution of a judgment in mortgage foreclosure obtained in the Court of Common Pleas of Clearfield County, where plaintiff was the successful bidder, and became the owner of the said property.

3. Plaintiff, by virtue of the aforesaid title, is the owner in fee of the said premises, and is entitled to possession thereof. The defendants Tina R. Myers or occupants are occupying the said premises without right, and so far as the plaintiff is informed, without claim of title.

WHEREFORE, plaintiff brings this suit and seeks to recover possession of said premises.



Martha E. Von Rosenstiel
Attorney for Plaintiff

Legal Description: (As shown on Mortgage)

ALL THAT CERTAIN PIECE, PARCEL OR TRACT OF LAND SITUATE IN THE TOWNSHIP OF KARTHAUS, COUNTY OF CLEARFIELD AND COMMONWEALTH OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT A POINT BEING THE CORNER OF POTTER STREET AND AN ALLEY, SAID CORNER BEING THE NORTHEAST CORNER OF THE LAND HEREIN CONVEYED; THENCE IN A SOUTHERLY DIRECTION ALONG THE WESTERN LINE OF THE RIGHT OF WAY OF POTTER STREET, EIGHTY (80) FEET TO AN IRON PIN; THENCE ALONG LINE OF LANDS OF RALPH L. MCGONIGAL ET AL, OF WHICH THIS PARCEL IS PART, IN A WESTERLY DIRECTION SIXTY (60) FEET, MORE OR LESS, TO LINE OF LANDS NOW OR FORMERLY OF THOMAS LEE TATE; THENCE ALONG LINE OF LANDS OF THE SAID THOMAS LEE TATE IN A NORTHERLY DIRECTION EIGHTY (80) FEET TO AN ALLEY; THENCE ALONG LINE OF SAID ALLEY IN AN EASTERLY DIRECTION SIXTY (60) FEET TO POTTER STREET AND PLACE OF BEGINNING. BEING A RECTANGULAR PARCEL OF LAND FRONTING EIGHTY (80) FEET ON POTTER STREET AND SIXTY (60) FEET IN DEPTH, AND BEING A PART OF LOT NO. 6 IN "BLOCK A" ON A CERTAIN MAP OR PLAN FILED AND RECORDED BY THE TRUSTEES OF THE KARTHAUS ESTATE IN THE RECORDERS OFFICE IN CLEARFIELD PENNSYLVANIA ON NOVEMBER 21, 1882. MAP #121-T04-607-31.

AND BEING the same premises which were sold to FEDERAL NATIONAL MORTGAGE ASSOCIATION, as Trustee by the Sheriff of CLEARFIELD County on November 03, 2006 in execution of a judgment in mortgage foreclosure entered in the Court of Common Pleas of CLEARFIELD County in the matter of FEDERAL NATIONAL MORTGAGE ASSOCIATION, v. TINA R. MYERS, Docket No. 05-757-CD.

VERIFICATION

I verify that the statements made in the foregoing document(s) are true and correct.

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

By: 

Martha E. Von Rosenstiel, Esq.
Attorney for Plaintiff

MARTHA E. VON ROSENSTIEL, P.C.
ATTORNEY AT LAW
649 SOUTH AVENUE, UNIT 7
P.O. BOX 307
SECANE, PA 19050

PHONE (610) 328-2887
FAX (610) 328-2649
Direct Dial: 27
Email: vicky@mvrlaw.com

Martha E. Von Rosenstiel, Esquire
Leslie J. Rase, Esquire
Keri P. Claeys Esquire

November 29, 2006

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

RE: Federal National Mortgage Association v. Tina R. Myers or occupants,
Docket #, Our File #20137

Dear Sir/Madam:

Enclosed herewith Civil Action in Ejectment in the above matter, which I would like to have filed with the Court. My check in the amount of \$85.00 is enclosed to cover your costs.

Once the complaint has been filed and numbered, I would appreciate if you would transmit the extra copies and my checks in the amount of \$100.00 to the sheriff, so that service can be completed.

I have also enclosed an extra copy of the Complaint and a self addressed stamped envelope. I would appreciate it if you would time stamp this copy, number it, and return it to me in the provided envelope for my files.

I appreciate your assistance.

Sincerely yours,

Vicky Jillson
Evictions Department
Martha E. Von Rosenstiel, P.C.

Enclosure

Martha E. Von Rosenstiel, P.C.
CPD
Martha E. Von Rosenstiel
649 South Avenue, Unit 7
Scane, PA 19018
(610) 328-2887
Attorney I.D.# 52634

Attorney for Plaintiff

20137CPG vj

FEDERAL NATIONAL MORTGAGE
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1900 MARKET STREET SUITE 800
PHILADELPHIA PA 19103
PLAINTIFF

VS.

TINA R. MYERS OR OCCUPANTS
L 6 POTTER STREET
KARTHAUS PA 16845
DEFENDANT

: COURT OF COMMON PLEAS
: CLEARFIELD COUNTY
:
:
:

: CASE NO: 06-2013-CD
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PRAECIPE TO DISCONTINUE and END WITHOUT PREJUDICE

To the Prothonotary:

Kindly mark the above case discontinued and ended without prejudice.

By: 

Martha E. Von Rosenstiel, Esq.
Attorney for Plaintiff

December 21, 2006

FILED
DEC 29 2006
William A. Shaw
Prothonotary/Clerk of Courts
1 sent to Artu

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **102206**

FEDERAL NATIONAL MORTGAGE ASSOCIATION

Case # 06-2013-CD

vs.

TINA R. MYERS or OCCUPANTS

TYPE OF SERVICE COMPLAINT IN EJECTMENT

SHERIFF RETURNS

NOW March 08, 2007 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN EJECTMENT "NOT FOUND" AS TO TINA R. MYERS OR OCCUPANTS, DEFENDANT. L6 POTTER ST., KARTHAUS, PA. "EMPTY".

SERVED BY: /


Return Costs

PURPOSE	VENDOR	CHECK #	AMOUNT
SURCHARGE	ROSENSTIEL	15952	10.00
SHERIFF HAWKINS	ROSENSTIEL	15952	34.86

Sworn to Before me This

_____ Day of _____ 2007

So Answers,


Chester A. Hawkins
Sheriff

FILED
01311384
MAR 08 2007

William A. Shaw
Prothonotary/Clerk of Courts

20137CFC

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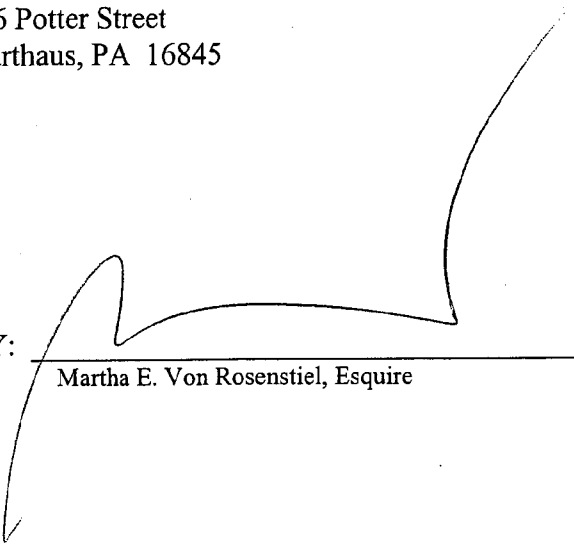
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Counsel of Record for
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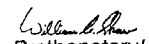
BY:


Martha E. Von Rosenstiel, Esquire

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

DEC 04 2006

Attest.


Prothonotary/
Clerk of Courts

Martha E. Von Rosenstiel, P.C.
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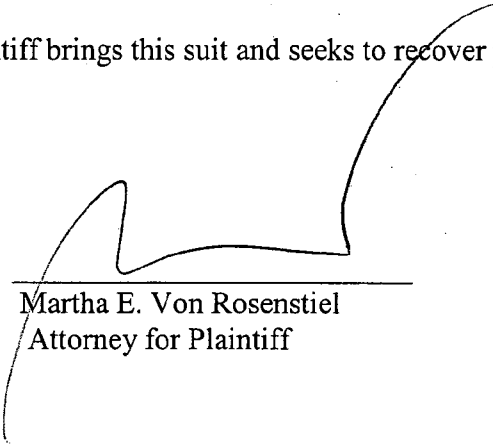
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Attorney for Plaintiff