

07-661-CD
Chase Home Fin. Vs Francis Pallo

JPMorgan et al vs Francis Pallo et al
2007-661-CD

Mortgage Foreclosures

Date		Judge
4/26/2007	New Case Filed.	No Judge
	X Filing: Complaint in Mortgage Foreclosure, situated in the Township of Decatur. Paid by: Hallinan, Francis S. (attorney for Chase Home Finance LLC) Receipt number: 1918756 Dated: 04/26/2007 Amount: \$85.00 (Check) 4CC shff.	No Judge
5/8/2007	X Praeipe to Substitute Legal Description, filed by s/ Francis S. Hallinan, Esquire. No CC	No Judge
5/29/2007	X Filing: Praeipe to Reinstate Civil Action/Mortgage Foreclosure Paid by: Hallinan, Francis S. (attorney for Chase Home Finance LLC) Receipt number: 1919163 Dated: 5/29/2007 Amount: \$7.00 (Check) 1CC Atty and 4 CC reinstated Complaints to shff.	No Judge
5/30/2007	X Sheriff Return, May 30, 2007 Returned the within Complaint in Mortgage Foreclosure "NOT SERVED, TIME EXPIRED" as to Francis J. Pallo Jr. May 30, 2007 Returned the within Complaint in Mortgage Foreclosure "NOT SERVED, TIME EXPIRED" as to Susan W. Pallo. May 30, 2007 Returned the within Complaint in Mortgage Foreclosure "NOT SERVED, TIME EXPIRED" as to Susan Pallo. May 30, 2007 Returned the within Complaint in Mortgage Foreclosure "NOT SERVED, TIME EXPIRED" as to Francis J. Pallo Jr. So Answers, Chester A. Hawkins, Sheriff by s/Marilyn Hamm Shff Hawkins costs pd by Phelan \$72.00 (1st service)	No Judge
	X Sheriff Return, May 30, 2007 Returned the within Complaint in Mortgage Foreclosure "NOT SERVED" as to Francis J. Pallo Jr. & Susan W. Pallo a/k/a Susan L. Pallo. So Answers, Chester A. Hawkins, Sheriff by s/Marilyn Hamm (2nd service)	No Judge
6/4/2007	X Praeipe to Substitute Legal Description: kindly substitute the attached legal description for the legal description originally filed with the complaint in the instant matter. Filed by s/ Francis S. Hallinan, Esquire. No CC	No Judge
6/14/2007	X Filing: Praeipe to reinstate civil action/mortgage foreclosure Paid by: Hallinan, Francis S. (attorney for Chase Home Finance LLC) Receipt number: 1919393 Dated: 6/14/2007 Amount: \$7.00 (Check) 4 reinstated complaint to shff. and 1 reinstated complaint to atty.	No Judge
10/3/2007	X Motion to Direct Sheriff to File Affidavit of Service, filed by s/ Michele M. Bradford Esq. No CC.	No Judge
10/5/2007	X Order, filed cert. to Atty and Sheriff NOW, this 5th day of October, 2007, ORDER directing the sheriff to file Return of Service by 3:30 PM.	Fredric Joseph Ammerman
10/8/2007	X Sheriff Return, Papers served on Defendant(s) Served Francis J. Pallo, Jr. on 7-29-07 and Susan W. Pallo on 6-27-07. So Answers, Chester A. Hawkins, Sheriff by s/Marilyn Hamm	No Judge
10/17/2007	X Certificate of Service, filed. That true and correct copies of Order granting Motion to Direct Sheriff to File Affidavit of Service were served upon Chester A. Hawkins-shff., Peter F. Smith Esq., Francis Pallo Jr and Susan Pallo by first class mail, filed by s/ Michele M. Bradford Esq. NO CC.	No Judge
10/24/2007	X Filing: Praeipe for In Re Judgment for Failure to Answer ans Assessment of Damgaes, Paid by: Hallinan, Francis S. (attorney for Chase Home Finance LLC) Receipt number: 1921178 Dated: 10/24/2007 Amount: \$20.00 (Check) Judgment entered in favor of the Plaintiff and against the defendants in the amount of \$99,605.92. 1CC & notice to defts. and statement to Atty.	No Judge

Fee Schedule

Clearfield County Prothonotary
PO Box 549, Clearfield, PA 16830
814-765-2641, Ext. 1330

www.clearfieldco.org/Departments/Prothonotary

Custody:

Custody Complaint \$85.00

Divorce:

Divorce Complaint (includes divorce counts) \$45.00

**must list all minor children and d.o.b. on cover sheet

Additional Counts at time of filing divorce *including custody* N/C

Additional Counts added after divorce filed-- \$ 85.00

not custody (ie. alimony, equitable dist., etc...) ea. \$10.00

Additional Count--Custody added after divorce filed \$20.00

Record Out of County Decree N/C

Certified Copy of Decree (no charge for initial \$16.00

copies) \$3.00

Satisfactions/Discontinuances:

Satisfactions, Releases, Postponements, etc. \$7.00

Discontinuance-case filed 1995-present N/C

Discontinuance-case filed prior to 1995 \$7.00

Miscellaneous:

Retake Prior Name \$10.00

Notary Registration \$3.00

Fax ea. \$5.00

Photocopies: 1-4 page total--\$1.00. Over 4 pages--\$.25 ea. \$20.00

Subpoena-include case number and caption \$20.00

Certified Docket Sheet \$15.00

Private Detective Licenses:

New Petition \$20.00

Renewal (per year) \$3.00

Summary Appeal (non-refundable) \$20.00

Criminal Subpoena \$30.00

Appeal to Higher Court-require orig. \$45.00

and one copy along with check \$20.00

for \$60.00 payable to Higher Court \$7.00

criminal check - notice here, 7.00 by mail

NOTE: Please monitor our website at www.clearfieldco.org/Departments/Prothonotary for updates and changes to the fee schedule

No Refunds on Overpayment of \$5.00 or Less. The Prothonotary **Shall Not Be Required** to Enter on the Docket any Suit or Action Or/By Order of Court or Enter Any Judgment Thereon or Perform Any Services whatsoever for Any Person, Political Subdivision or the Commonwealth until the Requisite Fee is Paid.

Appeals:

DJ Appeal-must include DJ transcript

License Suspension Appeals

Appeal to Higher Court-require orig.

and one copy along with check

for \$60.00 payable to Higher Court

Objection to Tax Sale

Objection to Private Sale

Arbitration/Trial Listing:

Praecipe/List for Arbitration

Praecipe-place civil case on Trial List

Appeal from Arbitration Award

...see Local Rule 1308

Civil Filing:

Complaint/Petition-initial filing

Writ of Summons

Transfer from Another County

Quiet Title (includes final order)

not for final action quiet title Road Docket

Exemplified Record (transfer to another county)

Reissue/Reinstate Complaint

Judgments/Liens/Writs/Waivers:

Judgment-DJ, Default, etc.

Confession of Judgment

Exemplify record to another county

Enter judgment from another county

Writ of Revival

Cert. Motor Vehicle Judgment to Harrisburg

Federal or Commonwealth Lien

Waiver/Stipulation of Mechanic's Lien

Writ of Execution, Possession,

Seizure, or Certiorari

Filing Out of County/Foreign Writ

Reissue/Reinstate Writ

Writ of Summons - \$5.00

Date: 1/24/2008

Clearfield County Court of Common Pleas

User: LMILLER

Time: 09:25 AM

ROA Report

Page 2 of 2

Case: 2007-00661-CD

Current Judge: Fredric Joseph Ammerman

Chase Home Finance LLC, Chase Manhattan Mortgage Corporation vs. Francis J. Pallo Jr., Susan W. Pallo

Mortgage Foreclosures

Date		Judge
10/24/2007	Filing: Praecipe for Writ of Execution Paid by: Hallinan, Francis S. (attorney for Chase Home Finance LLC) Receipt number: 1921178 Dated: 10/24/2007 Amount: \$20.00 (Check) 1CC & 6 writs w/prop. descriptions to shff. Writ of Execution amount \$99,605.92.	No Judge
12/3/2007	Plaintiff's Motion to Reassess Damages, filed by s/ Michele M. Bradford, Esquire. no CC	No Judge
12/5/2007	Rule, this 4th day of Dec., 2007, a Rule is entered upon the Defendants. Rule returnable on the 28th day of Jan., 2008, at 10:30 a.m. at the Clfd. Co. Courthouse. by the Court, /s/ Fredric J. Ammerman, Pres. Judge. 1CC to Atty.	Fredric Joseph Ammerman
12/13/2007	Praecipe to File Affidavit of Service, filed. That Francis J. Pallo and Susan Pallo on the 3rd day of December 2007 was handed a true and correct copy of the Notice of Sheriff's Sale, served by s./ D.M. Ellis., filed by s/ Daniel G. Schmieg Esq. No CC.	Fredric Joseph Ammerman
12/17/2007	Certification of Service, filed. That a true and correct copy of the Court's December 4, 2007 Rule directing the defendants to show cause as to why Plaintiff's Motion to Reassess Damages should not be granted was served upon Francis J. Pallo Jr and Susan W. Pallo, filed by s/ Michele M. Bradford Esq. NO CC.	Fredric Joseph Ammerman
1/10/2008	Affidavit Pursuant to Rule 3129.1 and Return of Service Pursuant to P.A.R.C.P. 405 of Notice of Sale, filed by s/ Daniel G. Schmieg Esq.	Fredric Joseph Ammerman
	Suggestion of Record Change	Fredric Joseph Ammerman
	Re: Defendant's Name, filed by s/ Daniel G. Schmieg Esq. No CC.	
	The correct name for Defendant(s) are: FRANCIS J. PALLO JR.	

1-28-08 Order, dated 1-28-08

Received of: Lansberry Tax Liens \$ 1.00

One and 00/100 Dollars

Amount

Copy Fee 1.00

Total: 1.00

William A. Shaw, Prothonotary/Clerk of Cou

0.00

Payment Method: Cash
Amount Tendered:

By:

Deputy Clerk

Clerk: HUDSON
Reprinted: 12/11/2007 by GLKNISLEY

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

150947

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

Plaintiff

v.

NO. 07-6061-CD

CLEARFIELD COUNTY

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866-0000

Defendants

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

May 29, 2007 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

Deputy Prothonotary

June 14, 2007 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

Deputy Prothonotary

FILED
APR 26 2007
William A. Shaw
Prothonotary/Clerk of Courts
Att. pd. 85.00
4cc Sheriff

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 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

Notice to Defend:
David S. Meholick, Court Administrator
Clearfield County Courthouse
2nd and Market Streets
Clearfield, PA 16830
814-765-2641 x 5982

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF THE
DEBT OR ANY PORTION THEREOF. IF DEFENDANT(S)
DO SO IN WRITING WITHIN THIRTY (30) DAYS OF
RECEIPT OF THIS PLEADING, COUNSEL FOR
PLAINTIFF WILL OBTAIN AND PROVIDE
DEFENDANT(S) WITH WRITTEN VERIFICATION
THEREOF; OTHERWISE, THE DEBT WILL BE ASSUMED
TO BE VALID. LIKEWISE, IF REQUESTED WITHIN
THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING,
COUNSEL FOR PLAINTIFF WILL SEND DEFENDANT(S)
THE NAME AND ADDRESS OF THE ORIGINAL
CREDITOR, IF DIFFERENT FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL
THE END OF THE THIRTY (30) DAY PERIOD
FOLLOWING FIRST CONTACT WITH YOU BEFORE
SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH
THE LAW PROVIDES THAT YOUR ANSWER TO THIS**

COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.

IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.

1. Plaintiff is

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866-0000

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.

3. On 08/28/2003 mortgagor(s) made, executed, and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No: 200315914. The mortgage and assignment(s), if any, are matters of public record and are incorporated herein by reference in accordance with Pa.R.C.P. 1019(g); which Rule relieves the Plaintiff from its obligations to attach documents to pleadings if those documents are of public record.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 12/01/2006 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$91,771.67
Interest	\$2,875.84
11/01/2006 through 04/25/2007 (Per Diem \$16.34)	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$289.44
08/28/2003 to 04/25/2007	
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$96,736.95
Escrow	
Credit	(\$88.57)
Deficit	\$0.00
Subtotal	<u>(\$88.57)</u>
TOTAL	\$96,648.38

7. If the mortgage is reinstated prior to a Sheriff's Sale, the attorney's fee set forth above may be less than the amount demanded based on work actually performed. The attorney's fees requested are in conformity with the mortgage and Pennsylvania law. Plaintiff reserves its right to collect attorney's fees up to 5% of the remaining principal balance in the event the property is sold to a third party purchaser at Sheriff's Sale, or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.
8. Plaintiff is not seeking a judgment of personal liability (or an in personam judgment) against the Defendant(s) in the Action; however, Plaintiff reserves its right to bring a separate Action to establish that right, if such right exists. If Defendant(s) has/have received a discharge of personal liability in a bankruptcy proceeding, this Action of Mortgage Foreclosure is in no way an attempt to reestablish such personal liability discharged in bankruptcy, but only to foreclose the mortgage and sell the mortgaged premises pursuant to Pennsylvania Law.

9. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
10. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$96,648.38, together with interest from 04/25/2007 at the rate of \$16.34 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By:


/s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE
DANIEL G. SCHMIEG, ESQUIRE
FRANCIS S. HALLINAN, ESQUIRE
Attorneys for Plaintiff

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD NO. 677, SAID POINT IS ALSO ON LINE OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES, FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50 SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED
TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN
DEED BOOK 914 PAGE 506.

PREMISES BEING: 735 RAIDER ROAD

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for PLAINTIFF in this matter, that Plaintiff is outside the jurisdiction of the court and or the Verification could not be obtained within the time allowed for the filing on the pleading, that he is authorized to make this verification pursuant to Pa. R. C. P. 1024 (c) and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of his knowledge, information and belief.

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



FRANCIS S. HALLINAN, ESQUIRE
Attorney for Plaintiff

DATE: 4/25/07

FILED

APR 26 2007

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP
By Lawrence T. Phelan, Esquire, ID. No. 32227
Francis S. Hallinan Esquire, ID No. 62695
One Penn Center at Suburban Station
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

Attorney for Plaintiff

**CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION**

Plaintiff

**Court of Common Pleas
CLEARFIELD County
No. 07-661-CD**

vs.

**FRANCIS J. PALLO, JR .
SUSAN W. PALLO, A/K/A
SUSAN L. PALLO**

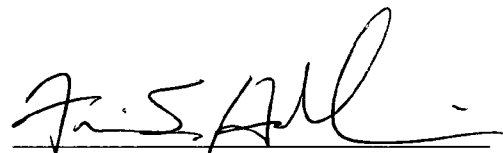
Defendant(s)

PRAECIPE TO SUBSTITUTE LEGAL DESCRIPTION

TO THE PROTHONOTARY:

Kindly substitute the attached legal description for the legal description originally filed with the complaint in the instant matter.

5/3/07
Date



Lawrence T. Phelan, Esquire
Francis S. Hallinan, Esquire
Attorneys for Plaintiff

PHS # 150947

FILED No CC
MAY 08 2007 (CR)

William A. Shaw
Prothonotary/Clerk of Courts

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD NO. 677, SAID POINT IS ALSO ON LINE OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES, FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50 SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN DEED BOOK 914 PAGE 506.

PREMISES BEING: 725 RAIDER ROAD

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION

Plaintiff

: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: CLEARFIELD County

vs.

FRANCIS J. PALLO
SUSAN W. PALLO

Defendants

: No. 07-661-CD
:
:
:
:

PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP

By:

FRANCIS S. HALLINAN, ESQUIRE
LAWRENCE T. PHELAN, ESQUIRE
DANIEL G. SCHMIEG, ESQUIRE
Attorneys for Plaintiff

Date: May 22, 2007

/lxh, Svc Dept.
File# 150947

FILED

MAY 29 2007

William A. Shaw

Prothonotary/Clerk of Courts

187.00 Att
m/j. 15cm ICC Att
4CC reinstated to
Shff.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 4 Services

Sheriff Docket # **102733**

CHASE HOME FINANCE LLC, S/B/M

Case # 07-661-CD

vs.

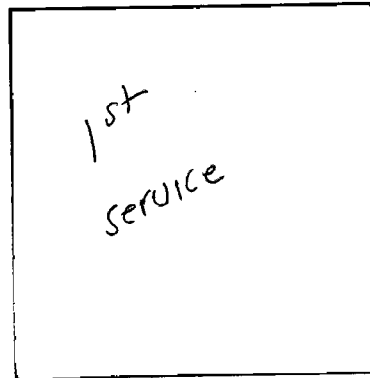
FRANCIS J PALLO, JR. & SUSAN W. PALLO A/K/A SUSAN L. PALLO

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW May 30, 2007 RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED" AS TO FRANCIS J PALLO, JR., DEFENDANT. NEVER RECEIVED PRAECIPE TO SUBSTITUTE LEGAL DESCRIPTION

SERVED BY: /



FILED
03:45 PM
MAY 30 2007

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 2 of 4 Services

Sheriff Docket # **102733**

CHASE HOME FINANCE LLC, S/B/M

Case # 07-661-CD

VS.

FRANCIS J PALLO, JR. & SUSAN W. PALLO A/K/A SUSAN L. PALLO

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW May 30, 2007 RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED" AS TO SUSAN W. PALLO A/K/A, DEFENDANT. NEVER RECEIVED PRAECIPE TO SUBSTITUTE LEGAL DESCRIPTION

SERVED BY: /

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 3 of 4 Services

Sheriff Docket # **102733**

CHASE HOME FINANCE LLC, S/B/M

Case # 07-661-CD

vs.

FRANCIS J PALLO, JR. & SUSAN W. PALLO A/K/A SUSAN L. PALLO

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW May 30, 2007 RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED" AS TO SUSAN PALLO, DEFENDANT. NEVER RECEIVED PRAECIPE TO SUBSTITUTE LEGAL DESCRIPTION

SERVED BY: /

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 4 of 4 Services

Sheriff Docket # **102733**

CHASE HOME FINANCE LLC, S/B/M

Case # 07-661-CD

vs.

FRANCIS J PALLO, JR. & SUSAN W. PALLO A/K/A SUSAN L. PALLO

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW May 30, 2007 RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED" AS TO FRANCIS J. PALLO JR., DEFENDANT. NEVER RECEIVED PRAECIPE TO SUBSTITUTE LEGAL DESCRIPTION

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102733
NO: 07-661-CD
SERVICES 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CHASE HOME FINANCE LLC, S/B/M

vs.

DEFENDANT: FRANCIS J PALLO, JR. & SUSAN W. PALLO A/K/A SUSAN L. PALLO

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	592442	40.00
SHERIFF HAWKINS	PHELAN	592442	32.00

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,



Chester A. Hawkins
Sheriff

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

150947

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

Plaintiff

v.

NO. 07-6661-CD

CLEARFIELD COUNTY

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866-0000

Defendants

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

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

APR 26 2007

Attest.

File #: 150947

William L. Shaw
Prothonotary/
Clerk of Courts

We hereby certify the
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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.

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814-765-2641 x 5982

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE
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PLAINTIFF WILL OBTAIN AND PROVIDE
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CREDITOR, IF DIFFERENT FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL
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FOLLOWING FIRST CONTACT WITH YOU BEFORE
SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH
THE LAW PROVIDES THAT YOUR ANSWER TO THIS**

COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.

IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.

1. Plaintiff is

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866-0000

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.

3. On 08/28/2003 mortgagor(s) made, executed, and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No: 200315914. The mortgage and assignment(s), if any, are matters of public record and are incorporated herein by reference in accordance with Pa.R.C.P. 1019(g); which Rule relieves the Plaintiff from its obligations to attach documents to pleadings if those documents are of public record.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 12/01/2006 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:


Principal Balance	\$91,771.67
Interest	\$2,875.84
11/01/2006 through 04/25/2007 (Per Diem \$16.34)	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$289.44
08/28/2003 to 04/25/2007	
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$96,736.95
Escrow	
Credit	(\$88.57)
Deficit	\$0.00
Subtotal	<u>(\$88.57)</u>
TOTAL	\$96,648.38

7. If the mortgage is reinstated prior to a Sheriff's Sale, the attorney's fee set forth above may be less than the amount demanded based on work actually performed. The attorney's fees requested are in conformity with the mortgage and Pennsylvania law. Plaintiff reserves its right to collect attorney's fees up to 5% of the remaining principal balance in the event the property is sold to a third party purchaser at Sheriff's Sale, or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.
8. Plaintiff is not seeking a judgment of personal liability (or an in personam judgment) against the Defendant(s) in the Action; however, Plaintiff reserves its right to bring a separate Action to establish that right, if such right exists. If Defendant(s) has/have received a discharge of personal liability in a bankruptcy proceeding, this Action of Mortgage Foreclosure is in no way an attempt to reestablish such personal liability discharged in bankruptcy, but only to foreclose the mortgage and sell the mortgaged premises pursuant to Pennsylvania Law.

9. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
10. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$96,648.38, together with interest from 04/25/2007 at the rate of \$16.34 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By: 
/s/Francis S. Hallinan
LAWRENCE T. PHELAN, ESQUIRE
DANIEL G. SCHMIEG, ESQUIRE
FRANCIS S. HALLINAN, ESQUIRE
Attorneys for Plaintiff

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD NO. 677, SAID POINT IS ALSO ON LINE OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES, FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50 SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED
TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN
DEED BOOK 914 PAGE 506.

PREMISES BEING: 735 RAIDER ROAD

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for PLAINTIFF in this matter, that Plaintiff is outside the jurisdiction of the court and or the Verification could not be obtained within the time allowed for the filing on the pleading, that he is authorized to make this verification pursuant to Pa. R. C. P. 1024 (c) and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of his knowledge, information and belief.

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

A handwritten signature in cursive script, appearing to read "F. S. Hallinan", is written above a horizontal line.

FRANCIS S. HALLINAN, ESQUIRE
Attorney for Plaintiff

DATE: 4/25/07

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COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

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v.

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CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

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Prothonotary/
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File #: 150947

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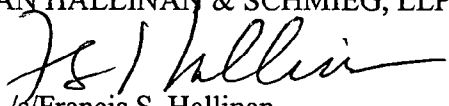
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PHELAN HALLINAN & SCHMIEG, LLP

By: _____


/s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

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FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

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DATE:

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THE LAW PROVIDES THAT YOUR ANSWER TO THIS**

COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.

IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.

1. Plaintiff is

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866-0000

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.

3. On 08/28/2003 mortgagor(s) made, executed, and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No: 200315914. The mortgage and assignment(s), if any, are matters of public record and are incorporated herein by reference in accordance with Pa.R.C.P. 1019(g); which Rule relieves the Plaintiff from its obligations to attach documents to pleadings if those documents are of public record.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 12/01/2006 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$91,771.67
Interest	\$2,875.84
11/01/2006 through 04/25/2007 (Per Diem \$16.34)	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$289.44
08/28/2003 to 04/25/2007	
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$96,736.95
Escrow	
Credit	(\$88.57)
Deficit	\$0.00
Subtotal	<u>(\$88.57)</u>
TOTAL	\$96,648.38

7. If the mortgage is reinstated prior to a Sheriff's Sale, the attorney's fee set forth above may be less than the amount demanded based on work actually performed. The attorney's fees requested are in conformity with the mortgage and Pennsylvania law. Plaintiff reserves its right to collect attorney's fees up to 5% of the remaining principal balance in the event the property is sold to a third party purchaser at Sheriff's Sale, or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.
8. Plaintiff is not seeking a judgment of personal liability (or an in personam judgment) against the Defendant(s) in the Action; however, Plaintiff reserves its right to bring a separate Action to establish that right, if such right exists. If Defendant(s) has/have received a discharge of personal liability in a bankruptcy proceeding, this Action of Mortgage Foreclosure is in no way an attempt to reestablish such personal liability discharged in bankruptcy, but only to foreclose the mortgage and sell the mortgaged premises pursuant to Pennsylvania Law.

9. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
10. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$96,648.38, together with interest from 04/25/2007 at the rate of \$16.34 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By: _____


/s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

DANIEL G. SCHMIEG, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD NO. 677, SAID POINT IS ALSO ON LINE OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES, FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50 SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED
TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN
DEED BOOK 914 PAGE 506.

PREMISES BEING: 735 RAIDER ROAD

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for PLAINTIFF in this matter, that Plaintiff is outside the jurisdiction of the court and or the Verification could not be obtained within the time allowed for the filing on the pleading, that he is authorized to make this verification pursuant to Pa. R. C. P. 1024 (c) and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of his knowledge, information and belief.

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



FRANCIS S. HALLINAN, ESQUIRE
Attorney for Plaintiff

DATE: 4/25/67

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

150947

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

Plaintiff

v.

NO. 07-6661-CD

CLEARFIELD COUNTY

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866-0000

Defendants

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

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

APR 26 2007

Attest.

William L. Prothro
Prothonotary/
Clerk of Courts

File #: 150947

We hereby certify the
within to be a true and
correct copy of the
original filed of record

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 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

Notice to Defend:
David S. Meholick, Court Administrator
Clearfield County Courthouse
2nd and Market Streets
Clearfield, PA 16830
814-765-2641 x 5982

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF THE
DEBT OR ANY PORTION THEREOF. IF DEFENDANT(S)
DO SO IN WRITING WITHIN THIRTY (30) DAYS OF
RECEIPT OF THIS PLEADING, COUNSEL FOR
PLAINTIFF WILL OBTAIN AND PROVIDE
DEFENDANT(S) WITH WRITTEN VERIFICATION
THEREOF; OTHERWISE, THE DEBT WILL BE ASSUMED
TO BE VALID. LIKEWISE, IF REQUESTED WITHIN
THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING,
COUNSEL FOR PLAINTIFF WILL SEND DEFENDANT(S)
THE NAME AND ADDRESS OF THE ORIGINAL
CREDITOR, IF DIFFERENT FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL
THE END OF THE THIRTY (30) DAY PERIOD
FOLLOWING FIRST CONTACT WITH YOU BEFORE
SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH
THE LAW PROVIDES THAT YOUR ANSWER TO THIS**

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PHELAN HALLINAN & SCHMIEG, LLP

By: _____


/s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

DANIEL G. SCHMIEG, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF
DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED
AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD
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BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES,
FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS
E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH
WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN
DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON
LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX
DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50
SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS
FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR
FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX
MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND
FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN
AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS
AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED
TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN
DEED BOOK 914 PAGE 506.

PREMISES BEING: 735 RAIDER ROAD

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for PLAINTIFF in this matter, that Plaintiff is outside the jurisdiction of the court and or the Verification could not be obtained within the time allowed for the filing on the pleading, that he is authorized to make this verification pursuant to Pa. R. C. P. 1024 (c) and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of his knowledge, information and belief.

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



FRANCIS S. HALLINAN, ESQUIRE
Attorney for Plaintiff

DATE: 4/25/67

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 1 Services

Sheriff Docket # **102844**

CHASE HOME FINANCE LLC, S/B/M/ TO CHASE

Case # 07-661-CD

vs.

FRANCIS J. PALLO, JR. and SUSAN W. PALLO a/k/a SUSAN L. PALLO

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW May 30, 2007 RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED" AS TO FRANCIS J. PALLO JR. & SUSAN W. PALLO A/K/A SSAN L. PALLO, DEFENDANT. RETURNED TO ATTY. AT THEIR REQUEST

SERVED BY: /

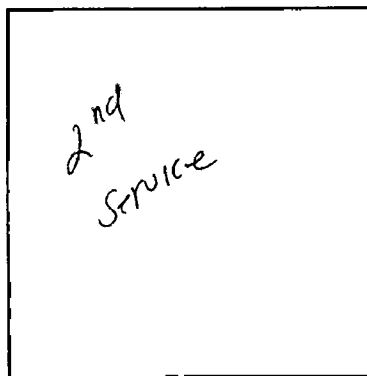
Return Costs

PURPOSE

VENDOR
NO COSTS

CHECK #

AMOUNT



FILED

0/3:45 cm
MAY 30 2007

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before me This

_____ Day of _____ 2007

So Answers,


Chester A. Hawkins
Sheriff

PHELAN HALLINAN & SCHMIEG, LLP
By Lawrence T. Phelan, Esquire, ID. No. 32227
Francis S. Hallinan Esquire, ID No. 62695
One Penn Center at Suburban Station
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

Attorney for Plaintiff

**CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION**

Plaintiff

**Court of Common Pleas
CLEARFIELD County
No. 07-661-CD**

vs.

**FRANCIS J. PALLO, JR .
SUSAN W. PALLO, A/K/A
SUSAN L. PALLO**

Defendant(s)

PRAECIPE TO SUBSTITUTE LEGAL DESCRIPTION

TO THE PROTHONOTARY:

Kindly substitute the attached legal description for the legal description originally filed with the complaint in the instant matter.

05/30/07
Date

Lawrence T. Phelan

Lawrence T. Phelan, Esquire
Francis S. Hallinan, Esquire
Attorneys for Plaintiff

PHS # 150947

FILED NO CC
mll:36301
JUN 04 2007 @R
William A. Shaw
Prothonotary/Clerk of Courts

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

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PREMISES BEING: 725 RADER ROAD

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTANMORTGAGE
CORPORATION

Plaintiff

vs.

FRANCIS J. PALLO
SUSAN W. PALLO

Defendants

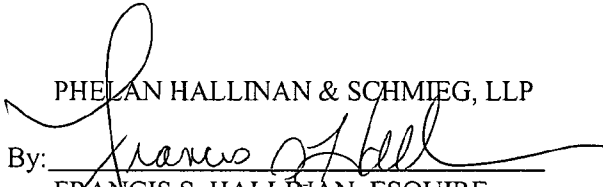
: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: CLEARFIELD County

:
: No. 07-661-CD
:
:
:

PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP
By: 
FRANCIS S. HALLINAN, ESQUIRE
LAWRENCE T. PHELAN, ESQUIRE
DANIEL G. SCHMIEG, ESQUIRE
Attorneys for Plaintiff

Date: June 11, 2007

/lxh, Svc Dept.
File# 150947

FILED pd \$7.00 A44.
m/2:15 pm 4 reinstated to
JUN 14 2007 SHL
William A. Shaw
Prothonotary/Clerk of Courts
1 reinstated to
A44

CA

FILED
OCT 10 3 2007
m/10:41/301
no cc
(6K)

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP
By: Michele M. Bradford, Esquire,
Attorney ID No. 69849
One Penn Center at Suburban Station
1617 J.F.K. Boulevard, Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

Chase Home Finance, LLC, s/b/m to Chase
Manhattan Mortgage Corporation
3415 Vision Drive
Columbus, OH 43219
Plaintiff

Court of Common Pleas

Clearfield County

vs.

Civil Division

Francis Pallo, Jr.
725 Rader Road
Philipsburg, PA 16866

No. 07-⁶⁰⁶¹~~1066~~-CD

Susan Pallo
186 Reed Street
Wallacetown, PA 16876
Defendants

MOTION TO DIRECT THE SHERIFF TO FILE AFFIDAVIT OF SERVICE

1. Plaintiff commenced the instant mortgage foreclosure action by filing a Complaint on 04/26/07. A true and correct copy of the Complaint is attached hereto, made part hereof, and marked as Exhibit "A".

2. The Sheriff of Clearfield County was requested to serve the Complaint upon the Defendants.

3. On 08/02/07, the Sheriff's Office verbally advised counsel for Plaintiff that Francis Pallo, Jr. and Susan Pallo were personally served the Complaint on 07/06/07 and 06/27/07 respectively.

4. On 8/02/07, Plaintiff sent the Defendants ten day letters notifying them of its intention to file a default judgment.

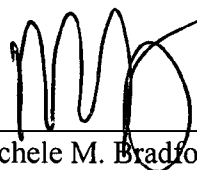
5. To date, the Clearfield County Sheriff's Office has not filed the affidavit of service, which was made on 07/06/07.

6. Plaintiff is unable to enter judgment and praecipe for a writ of execution until the Sheriff's Office files the affidavit of service of the Complaint with the Prothonotary. Interest accrues at the rate of \$16.34 per day on this mortgage account. Additionally, the Plaintiff continues to advance funds for real estate taxes and hazard insurance at its own expense.

7. The Plaintiff is greatly prejudiced by the delay in the filing of the Sheriff's Affidavit of Service.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order directing the Sheriff of Clearfield County to file the affidavit of service of the Complaint with the Prothonotary within seven days.

10/2/07
Date



Michele M. Bradford, Esquire
Attorney for Plaintiff

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire

Attorney ID No. 69849

One Penn Center at Suburban Station

1617 J.F.K. Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

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Manhattan Mortgage Corporation

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Columbus, OH 43219

Plaintiff

Court of Common Pleas

Clearfield County

vs.

Civil Division

Francis Pallo, Jr.

725 Rader Road

Philipsburg, PA 16866

No. 07-1066-CD

Susan Pallo

186 Reed Street

Wallacetown, PA 16876

Defendants

BRIEF IN SUPPORT OF MOTION TO DIRECT THE SHERIFF TO FILE
AFFIDAVIT OF SERVICE

I. PROCEDURAL HISTORY

Plaintiff commenced the instant mortgage foreclosure action by filing a Complaint on 04/26/07. The Sheriff of Clearfield County was requested to serve the Complaint upon the Defendants. On 08/02/07, the Sheriff's Office verbally advised counsel for Plaintiff that Francis

Pallo, Jr. and Susan Pallo were personally served the Complaint on 07/06/07 and 06/27/07 respectively. On 8/02/07, Plaintiff sent the Defendants ten day letters notifying them of its intention to file a default judgment. To date, the Clearfield County Sheriff's Office has not filed the affidavit of service, which was made on 07/06/07. Plaintiff is unable to enter judgment and praecipe for a writ of execution until the Sheriff's Office files the affidavit of service of the Complaint with the Prothonotary.

Plaintiff is unable to enter judgment and praecipe for a writ of execution until the Sheriff's Office files the affidavit of service of the Complaint with the Prothonotary. Interest accrues at the rate of \$16.34 per day on this mortgage account. Additionally, the Plaintiff continues to advance funds for real estate taxes and hazard insurance at its own expense.

II. LEGAL ANALYSIS

Pennsylvania Rule of Civil Procedure 400(a) requires that original process within the Commonwealth be made only by the Sheriff. Pa.R.C.P. 405(a) provides as follows:

When service of the original process has been made, the sheriff or other person making service shall make a return of service forthwith. . . .

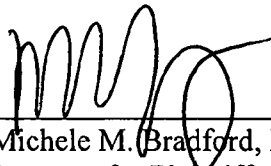
The Plaintiff does not have the ability to use a private process server to serve foreclosure complaints in Clearfield County. The Plaintiff must rely on the Sheriff to do so. In addition, the Sheriff has a duty to file his return of service "forthwith". In the instant case, the Sheriff's Office has not complied with that obligation.

Plaintiff is without an adequate remedy at law and will suffer irreparable harm unless the requested relief is granted. This Court has plenary power to administer equity according to well-settled principals of equity jurisprudence in cases under its jurisdiction. Cheval v. City of Philadelphia, 176 A. 779, 116 Pa. Super. 101 (1935). Moreover, it is well settled that Courts will lean to a liberal exercise of the equity power conferred upon them instead of encouraging technical

niceties in the modes of procedure and forms of pleading. Gunnet v. Trout, 380 Pa. 504, 112 A.2d 333 (1955). This is certainly a case where the exercise of this Court's equity powers is appropriate and necessary.

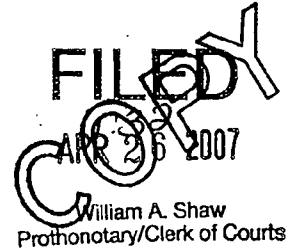
WHEREFORE, Plaintiff respectfully requests that the Court enter an Order directing the Sheriff of Clearfield County to file the affidavit of service of the Complaint with the Prothonotary within seven days.

10/2/07
Date



Michele M. Bradford, Esquire
Attorney for Plaintiff

EXHIBIT A



PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

150947

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

Plaintiff

v.

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866-0000

Defendants

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 07-6661-CD

CLEARFIELD COUNTY

Filed 4/26/07

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

ATTORNEY FILE COPY
PLEASE RETURN

We hereby certify the
within to be a true and
correct copy of the
original filed of record

PHELAN HALLINAN & SCHMIEG, LLP
By Lawrence T. Phelan, Esquire, ID. No. 32227
Francis S. Hallinan Esquire, ID No. 62695
One Penn Center at Suburban Station
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

Attorney for Plaintiff

**CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION**

Plaintiff

vs.

**FRANCIS J. PALLO, JR.
SUSAN W. PALLO, A/K/A
SUSAN L. PALLO**

Defendant(s)

**Court of Common Pleas
CLEARFIELD County
No. 07-661-CD
ATTORNEY FILE COPY
PLEASE RETURN**

PRAECIPE TO SUBSTITUTE LEGAL DESCRIPTION

TO THE PROTHONOTARY:

Kindly substitute the attached legal description for the legal description originally filed with the complaint in the instant matter.

05/30/07
Date

Lawrence T. Phelan

Lawrence T. Phelan, Esquire
Francis S. Hallinan, Esquire
Attorneys for Plaintiff

PHS # 150947

FILED
JUN 04 2007
William A. Shaw
Prothonotary/Clerk of Courts

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF
DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED
AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD
NO. 677, SAID POINT IS ALSO ON LINE OF NOW OR FORMERLY, JAMES AND EDNA
BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES,
FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS
E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH
WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN
DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON
LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX
DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50
SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS
FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR
FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX
MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND
FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN
AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS
AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED
TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN
DEED BOOK 914 PAGE 506.

PREMISES BEING: 725 RADER ROAD

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 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

Notice to Defend:
David S. Meholick, Court Administrator
Clearfield County Courthouse
2nd and Market Streets
Clearfield, PA 16830
814-765-2641 x 5982

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF THE
DEBT OR ANY PORTION THEREOF. IF DEFENDANT(S)
DO SO IN WRITING WITHIN THIRTY (30) DAYS OF
RECEIPT OF THIS PLEADING, COUNSEL FOR
PLAINTIFF WILL OBTAIN AND PROVIDE
DEFENDANT(S) WITH WRITTEN VERIFICATION
THEREOF; OTHERWISE, THE DEBT WILL BE ASSUMED
TO BE VALID. LIKEWISE, IF REQUESTED WITHIN
THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING,
COUNSEL FOR PLAINTIFF WILL SEND DEFENDANT(S)
THE NAME AND ADDRESS OF THE ORIGINAL
CREDITOR, IF DIFFERENT FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL
THE END OF THE THIRTY (30) DAY PERIOD
FOLLOWING FIRST CONTACT WITH YOU BEFORE
SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH
THE LAW PROVIDES THAT YOUR ANSWER TO THIS**

COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.

IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.

- 1.. Plaintiff is

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866-0000

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.

3. On 08/28/2003 mortgagor(s) made, executed, and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No: 200315914. The mortgage and assignment(s), if any, are matters of public record and are incorporated herein by reference in accordance with Pa.R.C.P. 1019(g); which Rule relieves the Plaintiff from its obligations to attach documents to pleadings if those documents are of public record.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 12/01/2006 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$91,771.67
Interest	\$2,875.84
11/01/2006 through 04/25/2007 (Per Diem \$16.34)	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$289.44
08/28/2003 to 04/25/2007	
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$96,736.95
Escrow	
Credit	(\$88.57)
Deficit	\$0.00
Subtotal	<u>(\$88.57)</u>
TOTAL	\$96,648.38

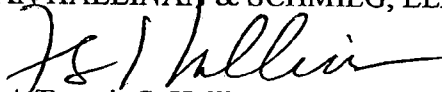
7. If the mortgage is reinstated prior to a Sheriff's Sale, the attorney's fee set forth above may be less than the amount demanded based on work actually performed. The attorney's fees requested are in conformity with the mortgage and Pennsylvania law. Plaintiff reserves its right to collect attorney's fees up to 5% of the remaining principal balance in the event the property is sold to a third party purchaser at Sheriff's Sale, or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.
8. Plaintiff is not seeking a judgment of personal liability (or an in personam judgment) against the Defendant(s) in the Action; however, Plaintiff reserves its right to bring a separate Action to establish that right, if such right exists. If Defendant(s) has/have received a discharge of personal liability in a bankruptcy proceeding, this Action of Mortgage Foreclosure is in no way an attempt to reestablish such personal liability discharged in bankruptcy, but only to foreclose the mortgage and sell the mortgaged premises pursuant to Pennsylvania Law.

9. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
10. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$96,648.38, together with interest from 04/25/2007 at the rate of \$16.34 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By:



/s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

DANIEL G. SCHMIEG, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD NO. 677, SAID POINT IS ALSO ON LINE OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES, FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50 SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED
TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN
DEED BOOK 914 PAGE 506.

PREMISES BEING: 735 RAIDER ROAD

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for PLAINTIFF in this matter, that Plaintiff is outside the jurisdiction of the court and or the Verification could not be obtained within the time allowed for the filing on the pleading, that he is authorized to make this verification pursuant to Pa. R. C. P. 1024 (c) and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of his knowledge, information and belief.

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



FRANCIS S. HALLINAN, ESQUIRE
Attorney for Plaintiff

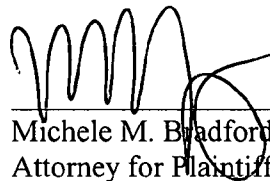
DATE: 4/25/67

VERIFICATION

Michele M. Bradford, Esquire hereby states that she is the attorney for the Plaintiff in this action, that she is authorized to make this Verification, and that the statements made in the foregoing Motion to Direct Sheriff to file Affidavit of Service and Brief in support thereof are true and correct to the best of her knowledge, information and belief. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

10/2/07
Date

PHELAN HALLINAN & SCHMIEG, LLP


Michele M. Bradford, Esquire
Attorney for Plaintiff

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire

Attorney ID No. 69849

One Penn Center at Suburban Station

1617 J.F.K. Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

Chase Home Finance, LLC, s/b/m to Chase

Manhattan Mortgage Corporation

3415 Vision Drive

Columbus, OH 43219

Plaintiff

vs.

Francis Pallo, Jr.

725 Rader Road

Philipsburg, PA 16866

Susan Pallo

186 Reed Street

Wallacetown, PA 16876

Defendants

ATTORNEY FOR PLAINTIFF

Court of Common Pleas

Clearfield County

Civil Division

No. 07-1066-CD

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of Plaintiff's Motion to Direct Sheriff to File Affidavit of Service and Brief in Support thereof were served upon the following interested parties via first class mail on the date indicated below:

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

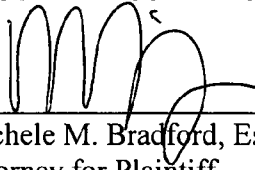
Francis Pallo, Jr.
725 Rader Road
Philipsburg, PA 16866

Peter F. Smith, Esquire
30 S. 2nd Street,
PO Box 130
Clearfield, PA 16830-2347
(Sheriff's Solicitor)

Susan Pallo
186 Reed Street
Wallacetown, PA 16876

10/2/07
Date

PHELAN HALLINAN & SCHMIEG, LLP



Michele M. Bradford, Esquire
Attorney for Plaintiff

VA

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

CHASE HOME FINANCE, LLC, s/b/m to *
CHASE MANHATTAN MORTGAGE CORPORATION, *
Plaintiff *

vs. *

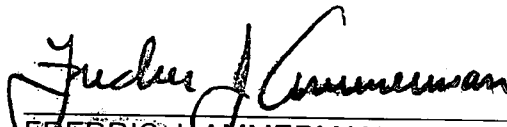
FRANCIS PALLO, JR.
Defendant *

NO. 07-⁶⁰⁶¹~~4066~~-CD

ORDER

NOW, this 5th day of October, 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 to Direct the Sheriff to File Affidavit 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 Monday, October 8th, 2007. The Prothonotary shall notify the Court as to the filing of the return.

BY THE COURT,


FREDRIC J. AMMERMAN
President Judge

FILED
012:54/01
OCT 05 2007
William A. Shaw
Prothonotary/Clerk of Courts
ICC Sheriff
(without memo)

FILED

OCT 05 2007

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

DATE: 10/5/07

X 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: _____

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102910
NO: 07-661-CD
SERVICE # 1 OF 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CHASE HOME FINANCE LLC, S/B/M

vs.

DEFENDANT: FRANCIS J. PALLO, JR. & SUSAN W. PALLO a/k/a SUSAN L. PALLO

SHERIFF RETURN

NOW, July 06, 2007 AT 2:20 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON FRANCIS J. PALLO DEFENDANT AT 725 RADER ROAD, PHILIPSBURG, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO FRANCIS PALLO, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN / HUNTER

FILED
07:02/01
OCT 08 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102910
NO: 07-661-CD
SERVICE # 2 OF 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CHASE HOME FINANCE LLC, S/B/M

vs.

DEFENDANT: FRANCIS J. PALLO, JR. & SUSAN W. PALLO a/k/a SUSAN L. PALLO

SHERIFF RETURN

NOW, June 27, 2007 AT 3:20 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON SUSAN W. PALLO aka SUSAN L. PALLO DEFENDANT AT 186 REED ST., WALLACETON, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO SUSAN PALLO, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102910
NO: 07-661-CD
SERVICE # 3 OF 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CHASE HOME FINANCE LLC, S/B/M

VS.

DEFENDANT: FRANCIS J. PALLO, JR. & SUSAN W. PALLO a/k/a SUSAN L. PALLO

SHERIFF RETURN

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SERVED BY: DEHAVEN / HUNTER

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102910
NO: 07-661-CD
SERVICE # 4 OF 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CHASE HOME FINANCE LLC, S/B/M

VS.

DEFENDANT: FRANCIS J. PALLO, JR. & SUSAN W. PALLO a/k/a SUSAN L. PALLO

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SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 102910
NO: 07-661-CD
SERVICES 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CHASE HOME FINANCE LLC, S/B/M

vs.

DEFENDANT: FRANCIS J. PALLO, JR. & SUSAN W. PALLO a/k/a SUSAN L. PALLO

SHERIFF RETURN

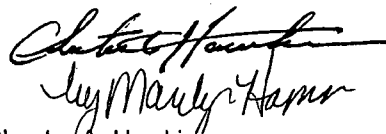
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	603490	40.00
SHERIFF HAWKINS	PHELAN	603490	60.00

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,



Chester A. Hawkins
Sheriff

FILED ^{NO CC}
m/11/05/01
OCT 17 2007

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire

Attorney ID No. 69849

One Penn Center at Suburban Station

1617 J.F.K. Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

Chase Home Finance, LLC, s/b/m to Chase

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Plaintiff

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Francis Pallo, Jr.

725 Rader Road

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186 Reed Street

Wallacetown, PA 16876

Defendants

ATTORNEY FOR PLAINTIFF

Court of Common Pleas

Clearfield County

Civil Division

⁶⁶⁶¹
No. 07-~~1866~~ CD

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of Order granting Motion to Direct Sheriff to File Affidavit of Service were served upon the following interested parties via first class mail on the date indicated below:

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

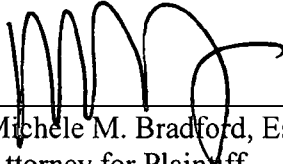
Peter F. Smith, Esquire
30 S. 2nd Street,
PO Box 130
Clearfield, PA 16830-2347
(Sheriff's Solicitor)

Francis Pallo, Jr.
725 Rader Road
Philipsburg, PA 16866

Susan Pallo
186 Reed Street
Wallacetown, PA 16876

10/12/07
Date

PHELAN HALLINAN & SCHMIEG, LLP



Michele M. Bradford, Esquire
Attorney for Plaintiff

PHELAN HALLINAN & SCHMIEG
By: DANIEL G. SCHMIEG
Identification No. 62205
One Penn Center at Suburban Station - Suite 1400
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814
(215) 563-7000
Attorney for Plaintiff

FILED *Atty pd. 20.00*
11:49/20
OCT 24 2007 *CC Notice to Defs.*
William A. Shaw
Prothonotary/Clerk of Courts *Statement to Atty*

CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

CLEARFIELD COUNTY
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 07-661-CD

Plaintiff,

v.

FRANCIS J. PALLO
SUSAN W. PALLO A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866

Defendant(s).

PRAECIPE FOR IN REM JUDGMENT FOR FAILURE TO
ANSWER AND ASSESSMENT OF DAMAGES

TO THE OFFICE OF THE PROTHONOTARY:

Kindly enter an in rem judgment in favor of the Plaintiff and against FRANCIS J. PALLO and SUSAN W. PALLO A/K/A SUSAN L. PALLO, Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in the Complaint	\$ 96,648.38
Interest - 04/26/07 - 10/23/07	\$ 2,957.54
TOTAL	<u>\$ 99,605.92</u>

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

Daniel G. Schmieg
DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 10/24/07

William A. Shaw
PRO PROTHY

150947

PHELAN HALLINAN AND SCHMIEG

By: Lawrence T. Phelan, Esq., Id. No. 32227

Francis S. Hallinan, Esq., Id. No. 62695

Daniel G. Schmieg, Esq., Id. No. 62205

One Penn Center Plaza, Suite 1400

Philadelphia, PA 19103

(215) 563-7000

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO CHASE : COURT OF COMMON PLEAS

MANHATTAN MORTGAGE CORPORATION

Plaintiff

: CIVIL DIVISION

Vs.

: CLEARFIELD COUNTY

FRANCIS J. PALLO

SUSAN W. PALLO A/K/A SUSAN L. PALLO

Defendants

: NO. 07-661-CD

TO: SUSAN W. PALLO A/K/A SUSAN L. PALLO
186 REED STREET
WALLACETON, PA 16876

DATE OF NOTICE: AUGUST 2, 2007

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

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.

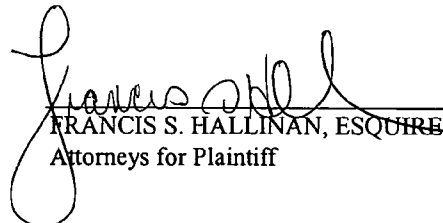
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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.

CLEARFIELD COUNTY
DAVID S. MEHOLICK, COURT
ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
(814) 765-2641 x 5982

PENNSYLVANIA LAWYER REFERRAL
SERVICE
PENNSYLVANIA BAR ASSOCIATION
100 SOUTH STREET
P.O. BOX 186
HARRISBURG, PA 17108
800-692-7375

FILE COPY


FRANCIS S. HALLINAN, ESQUIRE
Attorneys for Plaintiff

PHELAN HALLINAN AND SCHMIEG

By: Lawrence T. Phelan, Esq., Id. No. 32227

Francis S. Hallinan, Esq., Id. No. 62695

Daniel G. Schmieg, Esq., Id. No. 62205

One Penn Center Plaza, Suite 1400

Philadelphia, PA 19103

(215) 563-7000

CHASE HOME FINANCE LLC, S/B/M TO CHASE : COURT OF COMMON PLEAS
MANHATTAN MORTGAGE CORPORATION

Plaintiff

: CIVIL DIVISION

Vs.

: CLEARFIELD COUNTY

FRANCIS J. PALLO

SUSAN W. PALLO A/K/A SUSAN L. PALLO

Defendants

: NO. 07-661-CD

TO: FRANCIS J. PALLO
725 RADER
PHILIPSBURG, PA 16866

DATE OF NOTICE: AUGUST 2, 2007

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

IMPORTANT NOTICE

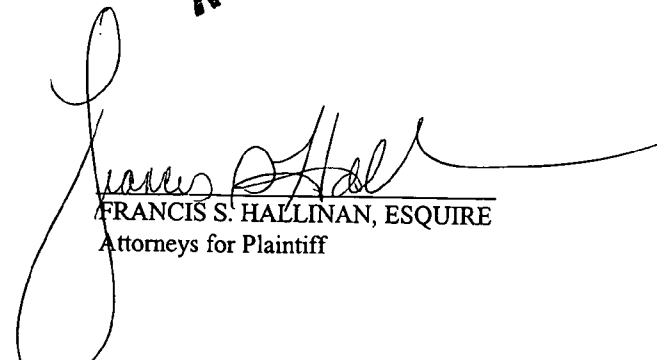
YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

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CLEARFIELD COUNTY
DAVID S. MEHOLICK, COURT
ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
(814) 765-2641 x 5982

PENNSYLVANIA LAWYER REFERRAL
SERVICE
PENNSYLVANIA BAR ASSOCIATION
100 SOUTH STREET
P.O. BOX 186
HARRISBURG, PA 17105
800-692-7773


FRANCIS S. HALLINAN, ESQUIRE
Attorneys for Plaintiff

PHELAN HALLINAN & SCHMIEG

By: DANIEL G. SCHMIEG

Identification No. 62205

ATTORNEY FOR PLAINTIFF

Suite 1400

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard

Philadelphia, PA 19103-1814

(215) 563-7000

CHASE HOME FINANCE LLC, S/B/M TO

CHASE MANHATTAN MORTGAGE

CORPORATION

3415 VISION DRIVE

COLUMBUS, OH 43219

Plaintiff,

v.

FRANCIS J. PALLO

SUSAN W. PALLO A/K/A SUSAN L. PALLO

725 RADER ROAD

PHILIPSBURG, PA 16866

Defendant(s).

CLEARFIELD COUNTY

COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 07-661-CD

VERIFICATION OF NON-MILITARY SERVICE

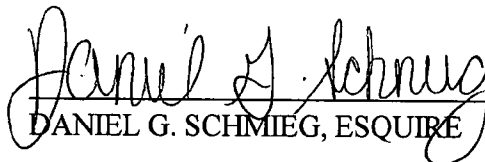
DANIEL G. SCHMIEG, ESQUIRE, hereby verifies that he is attorney for the Plaintiff in the above-captioned matter, and that on information and belief, he has knowledge of the following facts, to wit:

(a) that the defendant(s) is/are 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 Act of Congress of 1940, as amended.

(b) that defendant **FRANCIS J. PALLO** is over 18 years of age and resides at **725 RADER ROAD, PHILIPSBURG, PA 16866**.

(c) that defendant **SUSAN W. PALLO A/K/A SUSAN L. PALLO** is over 18 years of age, and resides at **725 RADER ROAD, PHILIPSBURG, PA 16866**.

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


DANIEL G. SCHMIEG, ESQUIRE

IN THE COURT OF COMMON PLEAS
CLEARFIELD PENNSYLVANIA

CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

Plaintiff,

v.

FRANCIS J. PALLO
SUSAN W. PALLO A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866

Defendant(s).

:
:
: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: NO. 07-661-CD
:
:
:
:
:

Notice is given that a Judgment in the above captioned matter has been entered against you
on October 24, 2007.

BY William L. Shanley DEPUTY
30

If you have any questions concerning this matter, please contact:

Daniel G. Schmieg
DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff
One Penn Center at Suburban Station, Suite 1400
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814
(215) 563-7000

This firm is a debt collector attempting to collect a debt. Any information we obtain will be used for that purpose. If you have previously received a discharge in bankruptcy, this correspondence is not and should not be construed to be an attempt to collect a debt, but only enforcement of a lien against property.

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

Chase Home Finance LLC
Chase Manhattan Mortgage Corporation
Plaintiff(s)

No.: 2007-00661-CD

Real Debt: \$99,605.92

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Francis J. Pallo Jr.
Susan W. Pallo a/k/a Susan L. Pallo
Defendant(s)

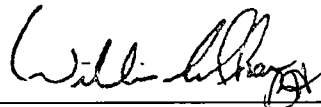
Entry: \$20.00

Instrument: In Rem Judgment

Date of Entry: October 24, 2007

Expires: October 24, 2012

Certified from the record this 24th day of October, 2007.



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

COPY

PRAECIPE FOR WRIT OF EXECUTION – (MORTGAGE FORECLOSURE)
P.R.C.P. 3180-3183

CHASE HOME FINANCE LLC,
S/B/M.TO.CHASE.MANHATTAN
MORTGAGE CORPORATION

vs.

FRANCIS J. PALLO

SUSAN W. PALLO A/K/A SUSAN
L. PALLO

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No. 07-661-CD Term 2005....

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

To the Director of the Office of Judicial Support

Issue writ of execution in the above matter:

Amount Due

\$99,605.92

Interest from OCTOBER 23, 2007 to Sale
Per diem \$16.37

\$ _____

Prothonotary costs 139.00

Add'l Costs

\$3,674.00

Harold G. Sch...

Attorney for the Plaintiff(s)

Note: Please attach description of Property.

150947

FILED ICC @ 6 wnts
m/2: 1330 w/ prop. description
OCT 24 2007 to Sheriff
William A. Shaw
Prothonotary/Clerk of Courts *Atty pd. 20.00*

No. 07-661-CD..... Term 20 05 A.D.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

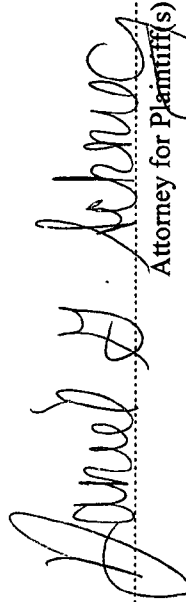
CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION

vs.

FRANCIS J. PALLO
SUSAN W. PALLO A/K/A SUSAN L. PALLO

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed:


Attorney for Plaintiff(s)

Address: FRANCIS J. PALLO SUSAN W. PALLO A/K/A SUSAN L. PALLO
725 RADER ROAD 725 RADER ROAD
PHILIPSBURG, PA 16866 PHILIPSBURG, PA 16866

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD NO. 677, SAID POINT IS ALSO ON LINE OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES, FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50 SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN DEED BOOK 914 PAGE 506.

TITLE TO SAID PREMISES IS VESTED IN Francis J. Pallo, Jr. and Susan W. Pallo, husband and wife, by Deed from Allan B. McClure and Jacquelyn A. McClure, husband and wife, dated 03/24/2003, recorded 04/22/2003, in Deed Mortgage Inst# 200306464.

Premises being: 725 RADER ROAD
PHILIPSBURG, PA 16866

Tax Parcel No. P11-000-00270

PHELAN HALLINAN & SCHMIEG

By: DANIEL G. SCHMIEG

Identification No. 62205

Suite 1400

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard

Philadelphia, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO

CHASE MANHATTAN MORTGAGE

CORPORATION

3415 VISION DRIVE

COLUMBUS, OH 43219

Plaintiff,

v.

FRANCIS J. PALLO

SUSAN W. PALLO A/K/A SUSAN L. PALLO

725 RADER ROAD

PHILIPSBURG, PA 16866

Defendant(s).

**CLEARFIELD COUNTY
COURT OF COMMON PLEAS**

CIVIL DIVISION

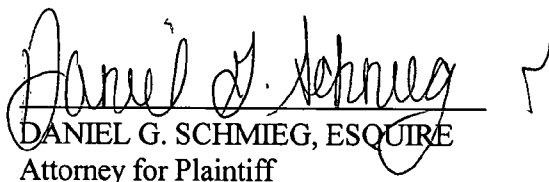
NO. 07-661-CD

CERTIFICATION

DANIEL G. SCHMIEG, ESQUIRE, hereby states that he is the attorney for the Plaintiff in the above captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

- ☐ an FHA Mortgage
- ☐ non-owner occupied
- ☐ vacant
- ☒ Act 91 procedures have been fulfilled

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


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

Plaintiff,

v.

FRANCIS J. PALLO
SUSAN W. PALLO A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866

Defendant(s).

CLEARFIELD COUNTY
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 07-661-CD

AFFIDAVIT PURSUANT TO RULE 3129
(Affidavit No.1)

CHASE HOME FINANCE LLC, S/B/M TO CHASE MANHATTAN MORTGAGE CORPORATION, Plaintiff in the above action, by its attorney, **DANIEL G. SCHMIEG, ESQUIRE**, sets forth as of the date the Praecipe for the Writ of Execution was filed, the following information concerning the real property located at **725 RADER ROAD, PHILIPSBURG, PA 16866**.

1. Name and address of Owner(s) or reputed Owner(s):

NAME

LAST KNOWN ADDRESS (If address cannot be
reasonably ascertained, please so indicate.)

FRANCIS J. PALLO

725 RADER ROAD
PHILIPSBURG, PA 16866

SUSAN W. PALLO A/K/A
SUSAN L. PALLO

725 RADER ROAD
PHILIPSBURG, PA 16866

2. Name and address of Defendant(s) in the judgment:

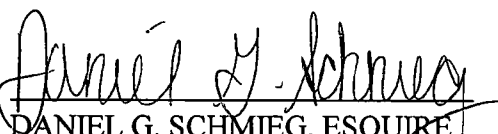
NAME

LAST KNOWN ADDRESS (If address cannot be
reasonably ascertained, please so indicate.)

Same as Above

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

OCTOBER 23, 2007
Date


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

**CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219**

Plaintiff,

v.

**FRANCIS J. PALLO
SUSAN W. PALLO A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866**

**CLEARFIELD COUNTY
COURT OF COMMON PLEAS**

CIVIL DIVISION

NO. 07-661-CD

Defendant(s).

AFFIDAVIT PURSUANT TO RULE 3129

CHASE HOME FINANCE LLC, S/B/M TO CHASE MANHATTAN MORTGAGE CORPORATION, Plaintiff in the above action, by its attorney, **DANIEL G. SCHMIEG, ESQUIRE**, sets forth as of the date the Praecipe for the Writ of Execution was filed, the following information concerning the real property located at **725 RADER ROAD, PHILIPSBURG, PA 16866**.

3. Name and address of every judgment creditor whose judgment is a record lien on the real property to be sold:

**NAME
WELLS FARGO BANK,
N.A., AS TRUSTEE FOR
OPTION ONE
WOODBRIIDGE LOAN
TRUST 2003-1 ASSET-
BACKED CERTIFICATES
SERIES 2003-1**

**LAST KNOWN ADDRESS (If address cannot be
reasonably ascertained, please so indicate.)
6501 IRVINE CENTER DRIVE
IRVINE, CA 92618**

**WELLS FARGO BANK,
N.A., AS TRUSTEE FOR
OPTION ONE
WOODBRIIDGE LOAN
TRUST 2003-1 ASSET-
BACKED CERTIFICATES
SERIES 2003-1**

**C/O GOLDBECK MCCAFFERTY AND MCKEEVER
ATTN: JOSEPH A. GOLDBECK, JR. ESQ.
MELLON INDEPENDENCE CENTER, SUITE 5000
PHILADELPHIA, PA 19106**

4. Name and address of the last recorded holder of every mortgage of record:

**NAME

NORTHWEST
SAVINGS BANK**

**LAST KNOWN ADDRESS (If address cannot be
reasonably ascertained, please so indicate.)
LIBERTY AND SECOND STREETS
WARREN, PA 16365**

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

NAME
None

LAST KNOWN ADDRESS (If address cannot be
reasonably ascertained, please so indicate.)

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

NAME

LAST KNOWN ADDRESS (If address cannot be
reasonably ascertained, please so indicate.)

None

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

NAME

LAST KNOWN ADDRESS (If address cannot be
reasonably ascertained, please so indicate.)

TENANT/OCCUPANT

725 RADER ROAD
PHILIPSBURG, PA 16866

DOMESTIC RELATIONS
CLEARFIELD COUNTY

CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET STREET
CLEARFIELD, PA 16830

COMMONWEALTH OF
PENNSYLVANIA

DEPARTMENT OF WELFARE
PO BOX 2675
HARRISBURG, PA 17105

Commonwealth of Pennsylvania
Bureau of Individual Tax
Inheritance Tax Division

6th Floor, Strawberry Sq., Dept 28061
Harrisburg, PA 17128

Internal Revenue Service
Federated Investors Tower

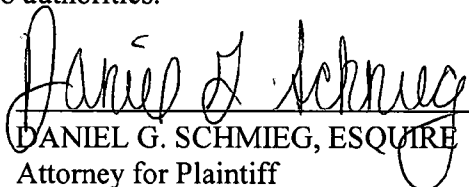
13TH Floor, Suite 1300
1001 Liberty Avenue
Pittsburgh, PA 15222

Department of Public Welfare
TPL Casualty Unit
Estate Recovery Program

P.O. Box 8486
Willow Oak Building
Harrisburg, PA 17105

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

OCTOBER 23, 2007
Date


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)
P.R.C.P. 3180-3183 and Rule 3257

COPY

CHASE HOME FINANCE LLC,
S/B/M TO CHASE MANHATTAN
MORTGAGE CORPORATION

vs.

FRANCIS J. PALLO

SUSAN W. PALLO A/K/A SUSAN
L. PALLO

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No. Term 20

No. 07-661-CD Term 20 05

No. Term 20

WRIT OF EXECUTION
(Mortgage Foreclosure)

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

To satisfy the judgment, interest and costs in the above matter you are directed to levy upon and sell the following property
(specifically described property below):

PREMISES: 725 RADER ROAD, PHILIPSBURG, PA 16866
(See Legal Description attached)

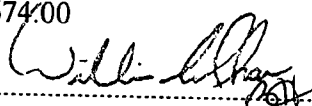
Amount Due \$99,605.92

Interest from OCTOBER 23, 2007 to Sale \$-----
per diem \$16.37

Total \$-----
139.00

Add'l Costs \$ 3,674.00

Prothonotary costs


(Clerk) Office of the Prothy Support, Common Pleas Court
of CLEARFIELD County, Penna.

Dated 10/24/07
(SEAL)

150947

No. 07-661-CD..... Term 20 05 A.D.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION

vs.

FRANCIS J. PALLO
SUSAN W. PALLO A/K/A SUSAN L. PALLO

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Real Debt \$99,605.92

Int. from OCTOBER 23, 2007
To Date of Sale (\$16.37 per diem)

Costs

Prothy Pd. 139.00

Sheriff

Francis J. Pallo
Attorney for Plaintiff(s)

Address: FRANCIS J. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866

SUSAN W. PALLO A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD NO. 677, SAID POINT IS ALSO ON LINE OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES, FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50 SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN DEED BOOK 914 PAGE 506.

TITLE TO SAID PREMISES IS VESTED IN Francis J. Pallo, Jr. and Susan W. Pallo, husband and wife, by Deed from Allan B. McClure and Jacquelyn A. McClure, husband and wife, dated 03/24/2003, recorded 04/22/2003, in Deed Mortgage Inst# 200306464.

Premises being: 725 RADER ROAD
PHILIPSBURG, PA 16866

Tax Parcel No. P11-000-00270

UP

FILED
DEC 03 2007
No CC
@

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP
by: Michele M. Bradford, Esquire
Atty. I.D. No. 69849
One Penn Center, Suite 1400
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION

Plaintiff

vs.

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO

Defendants

Court of Common Pleas

Civil Division

CLEARFIELD County

No. 07-661-CD

PLAINTIFF'S MOTION TO REASSESS DAMAGES

Plaintiff, by its Attorney, Michele M. Bradford, Esquire, moves the Court to direct the Prothonotary to amend the judgment in this matter, and in support thereof avers the following:

1. Plaintiff commenced this foreclosure action by filing a Complaint on April 26, 2007, a true and correct copy of which is attached hereto, made part hereof, and marked as Exhibit "A".

2. Judgment was entered on October 24, 2007 in the amount of \$99,605.92. A true and correct copy of the praecipe for judgment is attached hereto, made part hereof, and marked as Exhibit "B".

3. Pursuant to Pennsylvania Rule of Civil Procedure 1037(b)(1), a default judgment containing a dollar amount must be entered for the amount claimed in the complaint and any item which can be calculated from the complaint, i.e. bringing the interest current. However, new items cannot be added at the time of entry of the judgment.

4. The Property is listed for Sheriff's Sale on February 1, 2008.

5. Additional sums have been incurred or expended on Defendants' behalf since the Complaint was filed and Defendants have been given credit for any payments that have been made since the judgment. The amount of damages should now read as follows:

Principal Balance	\$91,771.67
Interest Through February 1, 2008	\$6,457.07
Per Diem \$16.34	
Late Charges	\$506.52
Legal fees	\$1,375.00
Cost of Suit and Title	\$1,926.50
Sheriff's Sale Costs	(\$0.00)
Property Inspections	\$0.00
Appraisal/Brokers Price Opinion	\$0.00
Mortgage Insurance Premium/	\$0.00
Private Mortgage Insurance	
Non Sufficient Funds Charge	\$0.00
Suspense/Misc. Credits	(\$0.00)
Escrow Deficit	\$2,944.26
TOTAL	\$104,981.02

6. The judgment formerly entered is insufficient to satisfy the amounts due on the Mortgage.

7. Under the terms of the Mortgage and Pennsylvania law, Plaintiff is entitled to inclusion of the figures set forth above in the amount of judgment against the Defendants.

8. Plaintiff's foreclosure judgment is in rem only and does not include personal liability, as addressed in Plaintiff's attached brief.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court amend the judgment as requested.

DATE: 11/29/07

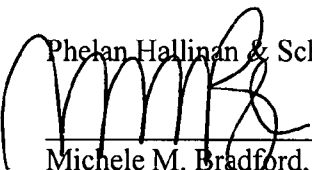
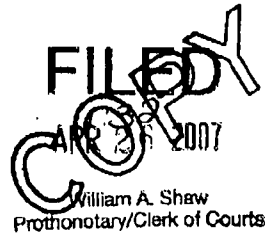
By:  Phelan Hallinan & Schmieg, LLP
Michele M. Bradford, Esquire
Attorney for Plaintiff

Exhibit “A”



PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

150947

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

Plaintiff

v.

NO. 07-6601-CD

CLEARFIELD COUNTY

Filed 4/26/07

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866-0000

Defendants

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

ATTORNEY FILE COPY
PLEASE RETURN

We hereby certify the
within to be a true and
correct copy of the
original filed of record

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 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

Notice to Defend:
David S. Meholic, Court Administrator
Clearfield County Courthouse
2nd and Market Streets
Clearfield, PA 16830
814-765-2641 x 5982

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF THE
DEBT OR ANY PORTION THEREOF. IF DEFENDANT(S)
DO SO IN WRITING WITHIN THIRTY (30) DAYS OF
RECEIPT OF THIS PLEADING, COUNSEL FOR
PLAINTIFF WILL OBTAIN AND PROVIDE
DEFENDANT(S) WITH WRITTEN VERIFICATION
THEREOF; OTHERWISE, THE DEBT WILL BE ASSUMED
TO BE VALID. LIKEWISE, IF REQUESTED WITHIN
THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING,
COUNSEL FOR PLAINTIFF WILL SEND DEFENDANT(S)
THE NAME AND ADDRESS OF THE ORIGINAL
CREDITOR, IF DIFFERENT FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL
THE END OF THE THIRTY (30) DAY PERIOD
FOLLOWING FIRST CONTACT WITH YOU BEFORE
SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH
THE LAW PROVIDES THAT YOUR ANSWER TO THIS**

COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.

IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.

1. Plaintiff is

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

2. The name(s) and last known address(es) of the Defendant(s) are:

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866-0000

who is/are the mortgagor(s) and/or real owner(s) of the property hereinafter described.

3. On 08/28/2003 mortgagor(s) made, executed, and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No: 200315914. The mortgage and assignment(s), if any, are matters of public record and are incorporated herein by reference in accordance with Pa.R.C.P. 1019(g); which Rule relieves the Plaintiff from its obligations to attach documents to pleadings if those documents are of public record.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 12/01/2006 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$91,771.67
Interest	\$2,875.84
11/01/2006 through 04/25/2007 (Per Diem \$16.34)	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$289.44
08/28/2003 to 04/25/2007	
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$96,736.95
Escrow	
Credit	(\$88.57)
Deficit	\$0.00
Subtotal	<u>(\$88.57)</u>
TOTAL	\$96,648.38

7. If the mortgage is reinstated prior to a Sheriff's Sale, the attorney's fee set forth above may be less than the amount demanded based on work actually performed. The attorney's fees requested are in conformity with the mortgage and Pennsylvania law. Plaintiff reserves its right to collect attorney's fees up to 5% of the remaining principal balance in the event the property is sold to a third party purchaser at Sheriff's Sale, or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.
8. Plaintiff is not seeking a judgment of personal liability (or an in personam judgment) against the Defendant(s) in the Action; however, Plaintiff reserves its right to bring a separate Action to establish that right, if such right exists. If Defendant(s) has/have received a discharge of personal liability in a bankruptcy proceeding, this Action of Mortgage Foreclosure is in no way an attempt to reestablish such personal liability discharged in bankruptcy, but only to foreclose the mortgage and sell the mortgaged premises pursuant to Pennsylvania Law.

9. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.
10. This action does not come under Act 6 of 1974 because the original mortgage amount exceeds \$50,000.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$96,648.38, together with interest from 04/25/2007 at the rate of \$16.34 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By:


/s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

DANIEL G. SCHMIEG, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD NO. 677, SAID POINT IS ALSO ON LINE OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES, FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50 SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED
TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN
DEED BOOK 914 PAGE 506.

PREMISES BEING: 735 RAIDER ROAD

VERIFICATION

FRANCIS S. HALLINAN, ESQUIRE hereby states that he is attorney for PLAINTIFF in this matter, that Plaintiff is outside the jurisdiction of the court and or the Verification could not be obtained within the time allowed for the filing on the pleading, that he is authorized to make this verification pursuant to Pa. R. C. P. 1024 (c) and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of his knowledge, information and belief.

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



FRANCIS S. HALLINAN, ESQUIRE
Attorney for Plaintiff

DATE: 4/25/67

Exhibit “B”

HELAN HALLINAN & SCHMIEG
by: DANIEL G. SCHMIEG
Identification No. 62205
One Penn Center at Suburban Station - Suite 1400
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814
(215) 563-7000

Attorney for Plaintiff

ATTORNEY FILE COPY
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FILED
OCT 2 2007

William A. Shaw
Prothonotary/Clerk of Courts

CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION
3415 VISION DRIVE
COLUMBUS, OH 43219

Plaintiff,

v.

FRANCIS J. PALLO
SUSAN W. PALLO A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866

Defendant(s).

CLEARFIELD COUNTY
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 07-661-CD

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PRAECIPE FOR IN REM JUDGMENT FOR FAILURE TO
ANSWER AND ASSESSMENT OF DAMAGES

TO THE OFFICE OF THE PROTHONOTARY:

Kindly enter an in rem judgment in favor of the Plaintiff and against **FRANCIS J. PALLO and SUSAN W. PALLO A/K/A SUSAN L. PALLO**, Defendant(s) for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in the Complaint
Interest - 04/26/07 - 10/23/07
TOTAL

ATTORNEY FILE COPY
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\$ 96,648.38
\$ 2,957.54
\$ 99,605.92

ATTORNEY FILE COPY
PLEASE RETURN

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

Daniel G. Schmieg
DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

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DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: 10/24/07

PROTHONOTARY

150947

VERIFICATION

Michele M. Bradford, Esquire, hereby states that she is the attorney for Plaintiff in this action, that she is authorized to make this verification, and that the statements made in the foregoing Motion to Reassess Damages are true and correct to the best of her knowledge, information and belief. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

DATE: 11/29/07

By: 

Phelan Hallinan & Schmieg, LLP

Michele M. Bradford, Esquire
Attorney for Plaintiff

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire, Atty. I.D. No. 69849

1617 John F. Kennedy Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO

CHASE MANHATTAN MORTGAGE

CORPORATION

Plaintiff

Court of Common Pleas

Civil Division

CLEARFIELD County

vs.

No. 07-661-CD

FRANCIS J. PALLO, JR

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

Defendants

CERTIFICATION OF SERVICE

I hereby certify that true and correct copies of Plaintiff's Motion to Reassess Damages, and Brief in Support thereof were sent to the following individuals on the date indicated below.

FRANCIS J. PALLO, JR

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

725 RADER ROAD

PHILIPSBURG, PA 16866-0000

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

186 REED STREET

WALLACETON, PA 16876

FRANCIS J. PALLO, JR

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

389 REED STREET

WALLACETON, PA 16876

DATE: 11/29/07

By: 

Phehan Hallinan & Schmieg, LLP

Michele M. Bradford, Esquire

Attorney for Plaintiff

CP

FILED

DEC 05 2007

0/9:50/10
William A. Shaw
Prothonotary/Clerk of Courts
1 cent to HPR

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION

Plaintiff

vs.

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO

Defendants

Court of Common Pleas

Civil Division

CLEARFIELD County

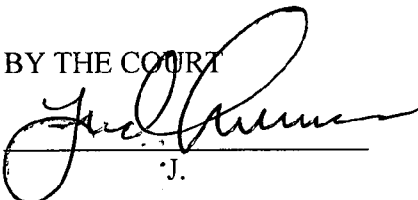
No. 07-661-CD

RULE

AND NOW, this 4 day of Dec 2007, a Rule is entered upon the
Defendants to show cause why an Order should not be entered granting Plaintiff's Motion to
Reassess Damages.

Rule Returnable on the 28th day of January 2008, at 10:30 in the Clearfield
County Courthouse, Clearfield, Pennsylvania.
A.M.

BY THE COURT


J.

150947

FILED

DEC 05 2007

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 12-5-07

X

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:

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
ONE PENN CENTER PLAZA, SUITE 1400
PLAINTIFF
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR

William A. Shaw
Prothonotary/Clerk of Courts

FILED No cc
m/a:0084
DEC 13 2007
Wm

CHASE HOME FINANCE LLC S/B/M TO : COURT OF COMMON PLEAS
CHASE MANHATTAN MORTGAGE :
CORPORATION : CIVIL DIVISION
Plaintiff :
: CLEARFIELD COUNTY

vs.

FRANCIS J. PALLO :
SUSAN W. PALLO A/K/A SUSAN L. PALLO : No. 07-661-CD
Defendants :
:
:

PRAECIPE TO FILE AFFIDAVIT OF SERVICE

TO THE PROTHONOTARY:

Kindly file the attached Affidavits of Service with reference to the above captioned
matter.

PHELAN HALLINAN & SCHMIEG, LLP

By: 
DANIEL G. SCHMIEG, ESQUIRE
Attorneys for Plaintiff

Date: December 12, 2007

PAW.
PHS # 150947

AFFIDAVIT OF SERVICE

PLAINTIFF

**CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION**

**CLEARFIELD County
No. 07-661-CD
Our File #: 150947**

DEFENDANT(S)

**FRANCIS J. PALLO
SUSAN W. PALLO A/K/A SUSAN L. PALLO**

**Type of Action
- Notice of Sheriff's Sale**

Please serve upon:

FRANCIS J. PALLO

Sale Date: February 1, 2008

SERVE AT:

**725 RADER ROAD
PHILIPSBURG, PA 16866**

SERVED

Served and made known to FRANCIS J. PALLO, Defendant, on the 3RD day of DECEMBER, 2007, at 1:20 o'clock P.m., at 725 RADER RD, PHILIPSBURG, PA 16866

Commonwealth of Pennsylvania, in the manner described below:

☒ Defendant personally served.
☐ Adult family member with whom Defendant(s) reside(s). Relationship is _____
☐ Adult in charge of Defendant(s)'s residence who refused to give name or relationship.
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).
☐ Agent or person in charge of Defendant(s)'s office or usual place of business.
☐ _____ an officer of said Defendant(s)'s company.
☐ Other: _____

Description: Age 45 Height 5'7 Weight 170 Race Cauc Sex M Other _____

I, D.M. Ellis, a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed
before me this 4th day
of DECEMBER, 2007.
Notary: _____

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Monica Crilly, Notary Public
City Of Altoona, Blair County
My Commission Expires Aug. 27, 2009
Member, Pennsylvania Association of Notaries

By: Dm Ellis

NOT SERVED

*****ATTEMPT SERVICE NLT THREE (3) TIMES*****

On the _____ day of _____, 200__, at _____ o'clock ____m., Defendant **NOT FOUND** because:

____ Moved ____ Unknown ____ No Answer ____ Vacant
1st attempt Date: _____ Time: _____, 2nd attempt Date: _____ Time: _____, 3rd
attempt Date: _____ Time: _____
Other: _____

Sworn to and subscribed
before me this _____ day
of _____, 200__.

Notary: _____

By: _____

Attorney for Plaintiff

**DANIEL G. SCHMIEG, Esquire - I.D. No. 62205
One Penn Center at Suburban Station, Suite 1400
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814
(215) 563-7000**

AFFIDAVIT OF SERVICE

PLAINTIFF

CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION

CLEARFIELD County
No. 07-661-CD
Our File #: 150947

DEFENDANT(S)

FRANCIS J. PALLO
SUSAN W. PALLO A/K/A SUSAN L. PALLO

Type of Action
- Notice of Sheriff's Sale

Please serve upon:

SUSAN W. PALLO A/K/A SUSAN L. PALLO

Sale Date: February 1, 2008

SERVE AT:

725 RADER ROAD
PHILIPSBURG, PA 16866

SERVED

Served and made known to Susan Pallo, Defendant, on the 3RD day of DECEMBER, 2007, at 1:20, o'clock P.m., at 725 RADER Rd., PHILIPSBURG, PA- 16866

Commonwealth of Pennsylvania, in the manner described below:

☐ Defendant personally served.
☒ Adult family member with whom Defendant(s) reside(s). Relationship is HUSBAND, FRANCIS
☐ Adult in charge of Defendant(s)'s residence who refused to give name or relationship.
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).
☐ Agent or person in charge of Defendant(s)'s office or usual place of business.
☐ an officer of said Defendant(s)'s company.
☐ Other: _____

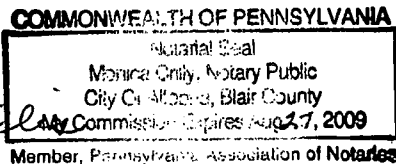
Description: Age 45 Height 5'7 Weight 170 Race Cauc Sex M Other _____

I, D.M. ELLIS, a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed
before me this 4th day
of December, 2007

Notary:

By: D.M. Ellis



NOT SERVED

ATTEMPT SERVICE NLT THREE (3) TIMES

On the _____ day of _____, 200__, at _____ o'clock ____m., Defendant **NOT FOUND** because:

____ Moved ____ Unknown ____ No Answer ____ Vacant

1st attempt Date: _____ Time: _____, 2nd attempt Date: _____ Time: _____, 3rd

attempt Date: _____ Time: _____.

Other: _____

Sworn to and subscribed
before me this _____ day
of _____, 200__.

Notary:

By:

Attorney for Plaintiff

DANIEL G. SCHMIEG, Esquire - I.D. No. 62205
One Penn Center at Suburban Station, Suite 1400
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814
(215) 563-7000

FILED

DEC 13 2007

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

FILED

m/12:56:54
DEC 17 2007

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire, Atty. I.D. No. 69849

1617 John F. Kennedy Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

CHASE HOME FINANCE LLC, S/B/M TO

CHASE MANHATTAN MORTGAGE

CORPORATION

Plaintiff

vs.

FRANCIS J. PALLO, JR

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

Defendants

ATTORNEY FOR PLAINTIFF

Court of Common Pleas

Civil Division

CLEARFIELD County

No. 07-661-CD

CERTIFICATION OF SERVICE

I hereby certify that a true and correct copy of the Court's December 4, 2007 Rule directing the Defendants to show cause as to why Plaintiff's Motion to Reassess Damages should not be granted was served upon the following individuals on the date indicated below.

FRANCIS J. PALLO, JR

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

725 RADER ROAD

PHILIPSBURG, PA 16866-0000

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

186 REED STREET

WALLACETON, PA 16876

FRANCIS J. PALLO, JR

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

389 REED STREET

WALLACETON, PA 16876

DATE: 12/13/07

By: [Signature]

Phelan Hallinan & Schmieg, LLP

Michele M. Bradford, Esquire
Attorney for Plaintiff

SALE DATE: **FEBRUARY 1, 2008**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL ACTION – LAW

**CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION**

No.: 07-661-CD

vs.


**FRANCIS J. PALLO, JR.
SUSAN W. PALLO
A/K/A SUSAN L. PALLO**

**AFFIDAVIT PURSUANT TO RULE 3129.1
AND RETURN OF SERVICE PURSUANT TO
Pa. R.C.P. 405 OF NOTICE OF SALE**


Plaintiff in the above action sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at:

725 RADER ROAD, PHILIPSBURG, PA 16866.

As required by Pa. R.C.P. 3129.2(a) Notice of Sale has been given in the manner required by Pa. R.C.P. 3129.2(c) on each of the persons or parties named, at that address set forth on the attached Affidavit No. 2 (previously filed) and Amended Affidavit No. 2 on the date indicated, and a copy of the notice is attached as an Exhibit. A copy of the Certificate of Mailing (Form 3817) and/or Certified Mail Return Receipt stamped by the U.S. Postal Service is attached for each notice.


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Date: January 9, 2008

FILED *no cc*
mto:4761
JAN 10 2008

William A. Shaw
Prothonotary/Clerk of Courts

Name and
Address
of Sender

COS
PHELAN HALLINAN & SCHMIEG
One Penn Center at Suburban Station, Suite 1400
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814

AK1

Francis Paillo - 150947.

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee
1		TENANT/OCCUPANT 725 RADER ROAD PHILPSBURG, PA 16866		
2		DOMESTIC RELATIONS CLEARFIELD COUNTY CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830		
3		COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF WELFARE PO BOX 2675 HARRISBURG, PA 17105		
4		Commonwealth of Pennsylvania, Bureau of Individual Tax, Inheritance Tax Division, 6 th Floor, Strawberry Sq., Dept 28061, Harrisburg, PA 17128		
5		Internal Revenue Service, Federated Investors Tower, 13 TH Floor, Suite 1300, 1001 Liberty Avenue, Pittsburgh, PA 15222		
6		Department of Public Welfare, TPL Casualty Unit, Estate Recovery Program, P.O. Box 8486, Willow Oak Building, Harrisburg, PA 17105		
7		WELLS FARGO BANK, N.A., AS TRUSTEE FOR OPTION ONE WOODBRIIDGE LOAN TRUST 2003-1 ASSET-BACKED CERTIFICATES SERIES 2003-1 6501 IRVINE CENTER DRIVE IRVINE, CA 92618		
8		WELLS FARGO BANK, N.A., AS TRUSTEE FOR OPTION ONE WOODBRIIDGE LOAN TRUST 2003-1 ASSET-BACKED CERTIFICATES SERIES 2003-1 C/O GOLDBECK MCCAFFERTY AND MCKEEVER ATTN: JOSEPH A. GOLDBECK, JR. ESQ. MELLON INDEPENDENCE CENTER, SUITE 5000 PHILADELPHIA, PA 19106		
9		NORTHWEST SAVINGS BANK LIBERTY AND SECOND STREETS WARREN, PA 16365		



PHELAN HALLINAN & SCHMIEG, LLP

By: DANIEL G. SCHMIEG

Identification No. 62205

One Penn Center at Suburban Station - Suite 1400

1617 John F. Kennedy Boulevard

Philadelphia, PA 19103-1814

(215) 563-7000

Attorney for Plaintiff

CHASE HOME FINANCE LLC,
S/B/M TO CHASE MANHATTAN
MORTGAGE CORPORATION

CLEARFIELD COUNTY

Plaintiff

vs

NO. 07-661-CD

FRANCIS J. PALLO
SUSAN W. PALLO
A/K/A SUSAN L. PALLO

Defendant(s)

SUGGESTION OF RECORD CHANGE
RE: DEFENDANT'S NAME

TO THE PROTHONOTARY:


DANIEL G. SCHMIEG attorney for the Plaintiff, hereby certifies that, to the best of his knowledge, information and belief the Defendant's name was erroneously listed as:

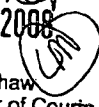
FRANCIS J. PALLO

The correct name for the Defendant(s) are:

FRANCIS J. PALLO, JR.

Kindly change the information on the docket.


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

FILED *no cc*
m110:4764
JAN 10 2008


William A. Shaw
Prothonotary/Clerk of Courts

William A. Shaw
Prothonotary/Clerk of Courts

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

CHASE HOME FINANCE LLC, S/B/M TO
CHASE MANHATTAN MORTGAGE
CORPORATION

Plaintiff

VS.

FRANCIS J. PALLO, JR
SUSAN W. PALLO
A/K/A SUSAN L. PALLO

Defendants

: Court of Common Pleas
:
:
: Civil Division
:
:
: CLEARFIELD County
:
:
: No. 07-661-CD

ORDER

AND NOW, this 28th day of January, ~~2007~~ ²⁰⁰⁸ the Prothonotary is ORDERED to amend the in rem judgment and the Sheriff is ORDERED to amend the writ nunc pro tunc in this case as follows:

Principal Balance	\$91,771.67
Interest Through February 1, 2008	\$6,457.07
Per Diem \$16.34	
Late Charges	\$506.52
Legal fees	\$1,375.00
Cost of Suit and Title	\$1,926.50
Sheriff's Sale Costs	(\$0.00)
Property Inspections	\$0.00
Appraisal/Brokers Price Opinion	\$0.00
Mortgage Insurance Premium /	\$0.00
Private Mortgage Insurance	
Non Sufficient Funds Charge	\$0.00

Suspense/Misc. Credits
Escrow Deficit

(\$0.00)
\$2,944.26

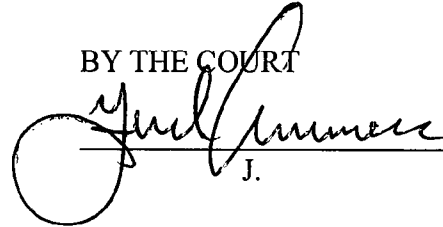
TOTAL

\$104,981.02

Plus interest from February 1, 2008 through the date of sale at six percent per annum.

Note: The above figure is not a payoff quote. Sheriff's commission is not included in the above figure.

BY THE COURT

A handwritten signature in black ink, appearing to read "J. J. [unclear]", is written over a horizontal line. To the left of the signature is a large, circular, stylized mark.

150947

FILED

JAN 28 2008

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire, Atty. I.D. No. 69849

1617 John F. Kennedy Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

CHASE HOME FINANCE LLC, S/B/M TO

CHASE MANHATTAN MORTGAGE

CORPORATION

Plaintiff

vs.

FRANCIS J. PALLO, JR

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

Defendants

ATTORNEY FOR PLAINTIFF

Court of Common Pleas

Civil Division

CLEARFIELD County

No. 07-661-CD

CERTIFICATION OF SERVICE

I hereby certify that a true and correct copy of the January 28, 2008 Order was sent to the following individuals on the date indicated below.

FRANCIS J. PALLO, JR

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

725 RADER ROAD

PHILIPSBURG, PA 16866-0000

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

186 REED STREET

WALLACETON, PA 16876

FRANCIS J. PALLO, JR

SUSAN W. PALLO

A/K/A SUSAN L. PALLO

389 REED STREET

WALLACETON, PA 16876

DATE: 1/28/08

By: 

Phelell Hallinan & Schmieg, LLP

Michele M. Bradford, Esquire
Attorney for Plaintiff

FILED

1/29/08
JAN 29 2008

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP
BY: FRANCIS S. HALLINAN, ESQUIRE
Identification No. 62695
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard, Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

Chase Home Finance LLC, s/b/m to
Chase Manhattan Mortgage Corporation

: Court of Common Pleas

Plaintiff

: Civil Division

vs.

: Clearfield County

Francis J. Pallo, Jr.
Susan W. Pallo, a/k/a Susan L. Pallo.
Defendant(s)

: No. 07-661-CD

PRAECIPE

TO THE PROTHONOTARY:

____ Please mark the above referenced case Discontinued and Ended without
prejudice.

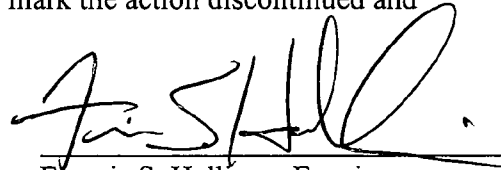
____ Please mark the above referenced case Settled, Discontinued and Ended.

X Please mark Judgments satisfied and the Action settled, discontinued and
ended.

____ Please Vacate the judgment entered and mark the action discontinued and
ended without prejudice.

____ Please withdraw the complaint and mark the action discontinued and
ended without prejudice.

Date: 2/1/08



Francis S. Hallinan, Esquire
Attorney for Plaintiff

PHS # 150947

FILED pa \$7.00 Atty
m/12:10um ICC d 1cc d
FEB 14 2008 of disc + sat
issued to Atty.
Hallinan
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

Chase Home Finance LLC
Chase Manhattan Mortgage Corporation

Vs.

No. 2007-00661-CD

Francis J. Pallo Jr.
Susan W. Pallo

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on Febraury 14, 2008, marked:

Settled, discontinued and ended

Record costs in the sum of \$146.00 have been paid in full by Francis S. Hallinan Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 14th day of February A.D. 2008.



William A. Shaw, Prothonotary

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

COPY

CERTIFICATE OF SATISFACTION OF JUDGMENT

No.: 2007-00661-CD

Chase Home Finance LLC
Chase Manhattan Mortgage Corporation

Debt: \$104,981.02

Vs.

Atty's Comm.:

Francis J. Pallo Jr.
Susan W. Pallo

Interest From:

Cost: \$7.00

NOW, Thursday, February 14, 2008, directions for satisfaction having been received, and all costs having been paid, SATISFACTION was entered of record.

Certified from the record this 14th day of February, A.D. 2008

 LM

Prothonotary

WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)
P.R.C.P. 3180-3183 and Rule 3257

CHASE HOME FINANCE LLC,
S/B/M TO CHASE MANHATTAN
MORTGAGE CORPORATION

vs.

FRANCIS J. PALLO

SUSAN W. PALLO A/K/A SUSAN
L. PALLO

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No. Term 20

No. 07-661-CD Term 20 Q5

No. Term 20

WRIT OF EXECUTION
(Mortgage Foreclosure)

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

To satisfy the judgment, interest and costs in the above matter you are directed to levy upon and sell the following property
(specifically described property below):

PREMISES: 725 RADER ROAD, PHILIPSBURG, PA 16866
(See Legal Description attached)

Amount Due

\$99,605.92

Interest from OCTOBER 23, 2007 to Sale
per diem \$16.37

\$-----

Total

\$-----
139.00

Prothonotary costs

Add'l Costs

\$ 3,674.00

William A. Hays
(Clerk) Office of the Prothy Support, Common Pleas Court
of CLEARFIELD County, Penna.

Dated 10/24/07
(SEAL)

150947

Received this writ this 24th day
of October A.D. 2007
At 2:00 A.M./P.M.

Carter G. Hawkins
Sheriff *By Cynthia Bitter-Creyher*

No. 07:661:CD..... Term 20.05 A.D.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CHASE HOME FINANCE LLC, S/B/M TO CHASE
MANHATTAN MORTGAGE CORPORATION

vs.

FRANCIS J. PALLO
SUSAN W. PALLO A/K/A SUSAN L. PALLO

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Real Debt \$99,605.92

Int. from OCTOBER 23, 2007
To Date of Sale (\$16.37 per diem)

Costs

Prothy Pd. 139.00

Sheriff

Francis J. Pallo
Attorney for Plaintiff(s)

Address: FRANCIS J. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866

SUSAN W. PALLO A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866

LEGAL DESCRIPTION

LOT NO. 1

ALL THAT CERTAIN PIECE OR PARCEL OF LAND SITUATED IN THE TOWNSHIP OF DECATUR, COUNTY OF CLEARFIELD AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BEGINNING AT AN IRON PIN LOCATED ON THE SOUTH SIDE OF TOWNSHIP ROAD NO. 677, SAID POINT IS ALSO ON LINE OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL; THENCE ALONG SAID ROAD, NORTH SEVENTY THREE DEGREES, FIFTY-SIX MINUTES, TEN SECONDS EAST, (N 73 DEGREES 56 MINUTES 10 SECONDS E) TWO HUNDRED FIFTY FEET (250.0) TO AN IRON PIN AND ALSO THE NORTH WEST CORNER OF LOT NO. 2; THENCE ALONG LOT NO. 2 SOUTH SIXTEEN DEGREES THREE MINUTES, FIFTY SECONDS EAST (319.28) TO AN IRON PIN ON LINE OF ANTHONY F. MULL; THENCE ALONG LANDS OF SAME SOUTH SIXTY-SIX DEGREES, FORTY MINUTES, FIFTY SECONDS WEST (S 66 DEGREES 40 MINUTES 50 SECONDS W) THREE HUNDRED NINETY-FOUR AND EIGHTY-FOUR HUNDREDTHS FEET (394.84) TO A STONE MONUMENT; THENCE ALONG LANDS OF NOW OR FORMERLY, JAMES AND EDNA BURGE, ET AL, NORTH FOUR DEGREES FIFTY-SIX MINUTES EAST (N 4 DEGREES 56 MINUTES E) THREE HUNDRED NINETY FIVE AND FOUR TENTHS FEET (395.4) TO AN IRON PIN AND PLACE OF BEGINNING. KNOWN AS LOT NO. 1 ON MAP PREPARED BY P.R. MONDOCK FOR SHIKOREY SURVEYS AND DATED AUGUST 22, 2000.

CONTAINING 2.4948 ACRES AND BEING PART OF THE SAME PREMISES CONVEYED TO ALLAN E. AND JACQUELYN A. MCCLURE AND RECORDED IN CLEARFIELD IN DEED BOOK 914 PAGE 506.

TITLE TO SAID PREMISES IS VESTED IN Francis J. Pallo, Jr. and Susan W. Pallo, husband and wife, by Deed from Allan B. McClure and Jacquelyn A. McClure, husband and wife, dated 03/24/2003, recorded 04/22/2003, in Deed Mortgage Inst# 200306464.

Premises being: 725 RADER ROAD
PHILIPSBURG, PA 16866

Tax Parcel No. P11-000-00270

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20685
NO: 07-661-CD

PLAINTIFF: CHASE HOME FINANCE LLC, S/B/M TO CHASE MANHATTAN MORTGAGE CORPORATION
vs.
DEFENDANT: FRANCIS J. PALLO AND SUSAN W. PALLO A/K/A SUSAN L. PALLO

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 10/24/2007

LEVY TAKEN 11/19/2007 @ 10:26 AM

POSTED 11/19/2007 @ 10:28 AM

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 2/28/2008

DATE DEED FILED NOT SOLD

FILED

01/15/08
FEB 29 2008

William A. Shaw
Prothonotary/Clerk of Courts

DETAILS

11/28/2007 @ 10:27 AM SERVED FRANCIS J. PALLO

SERVED FRANCIS J. PALLO, DEFENDANT, AT HIS RESIDENCE 725 RADER ROAD, PHILIPSBURG, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO FRANCIS J. PALLO

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY AND BY MAKING KNOW TO HIM / HER THE CONTENTS THEREOF.

11/28/2007 @ 10:27 AM SERVED SUSAN W. PALLO A/K/A SUSAN L. PALLO

SERVED SUSAN W. PALLO A/K/A SUSAN L. PALLO, DEFENDANT, AT HER RESIDENCE, 725 RADER ROAD, PHILIPSBURG, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO FRANCIS J. PALLO; HUSBAND OF DEFENDANT/ADULT AT RESIDENCE

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY AND BY MAKING KNOW TO HIM / HER THE CONTENTS THEREOF.

@ SERVED

NOW, JANUARY 30, 2008 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO STAY THE SHERIFF SALE SCHEDULED FOR FEBRUARY 1, 2008. THE SUM OF \$108,691.99 WAS RECEIVED TO CURE THE DEFAULT.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20685
NO: 07-661-CD

PLAINTIFF: CHASE HOME FINANCE LLC, S/B/M TO CHASE MANHATTAN MORTGAGE CORPORATION
vs.

DEFENDANT: FRANCIS J. PALLO AND SUSAN W. PALLO A/K/A SUSAN L. PALLO

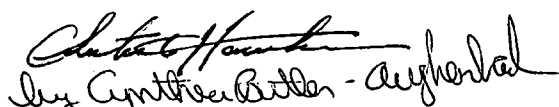
Execution REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS \$2,405.84

SURCHARGE \$40.00 PAID BY ATTORNEY

So Answers,


Chester A. Hawkins
Sheriff

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME FRANCIS J. PALLO

NO. 07-661-CD

NOW, February 29, 2008, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on February 01, 2008, I exposed the within described real estate of Francis J. Pallo And Susan W. Pallo A/K/A Susan L. Pallo to public venue or outcry at which time and place I sold the same to PHELAN HALLINAN & SCHMIEG, LLP he/she being the highest bidder, for the sum of \$108,691.99 and made the following appropriations, viz:

SHERIFF COSTS:

RDR	15.00
SERVICE	15.00
MILEAGE	15.52
LEVY	15.00
MILEAGE	15.52
POSTING	15.00
CSDS	10.00
COMMISSION	2,173.84
POSTAGE	4.92
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	
ADD'L POSTING	
ADD'L MILEAGE	31.04
ADD'L LEVY	
BID/SETTLEMENT AMOUNT	108,691.99
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	
TOTAL SHERIFF COSTS	\$2,405.84

DEED COSTS:

ACKNOWLEDGEMENT	
REGISTER & RECORDER	
TRANSFER TAX 2%	0.00
TOTAL DEED COSTS	\$0.00

PLAINTIFF COSTS, DEBT AND INTEREST:

DEBT-AMOUNT DUE	99,605.92
INTEREST @ 16.3700	1,653.37
FROM 10/23/2007 TO 02/01/2008	
ATTORNEY FEES	
PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	40.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	3,674.00
TOTAL DEBT AND INTEREST	\$104,973.29

COSTS:

ADVERTISING	429.46
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	
ACKNOWLEDGEMENT	
DEED COSTS	0.00
SHERIFF COSTS	2,405.84
LEGAL JOURNAL COSTS	180.00
PROTHONOTARY	139.00
MORTGAGE SEARCH	
MUNICIPAL LIEN	
TOTAL COSTS	\$3,154.30

DISTRIBUTION WILL BE MADE IN ACCORDANCE WITH THE ABOVE SCHEDULE UNLESS EXCEPTIONS ARE FILED WITH THIS OFFICE **WITHIN TEN (10) DAYS FROM THIS DATE.**

CHESTER A. HAWKINS, Sheriff

Law Offices
PHELAN HALLINAN & SCHMIEG, LLP
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
Christine.Schoffler@fedphe.com

Christine schoffler
Judgment Department, Ext. 1286

Representing Lenders in
Pennsylvania and New Jersey

January 30, 2008

Office of the Sheriff
Clearfield County Courthouse
230 East Market Street
Clearfield, PA 16830

ATTENTION: CINDY (814) 765-5915

Re: CHASE HOME FINANCE LLC, S/B/M TO CHASE MANHATTAN MORTGAGE
CORPORATION v. FRANCIS J. PALLO, JR. and SUSAN W. PALLO A/K/A SUSAN L. PALLO
725 RADER ROAD, PHILIPSBURG, PA 16866
No. 07-661-CD

Dear Cindy:

Please **STAY** the Sheriff's Sale of the above referenced property, which is scheduled for
FEBRUARY 1, 2008

You are hereby directed to immediately discontinue the advertising of the sale and processing or
posting of the Notice of Sale.

The sum of **\$108,691.99** was received in consideration for the stay.

Please return the original writ of execution to the Prothonotary as soon as possible.

Very truly yours,

Christine Schoffler

Christine Schoffler (for)
Phelan Hallinan & Schmieg, LLP

CC: FRANCIS J. PALLO, JR.
725 RADER ROAD
PHILIPSBURG, PA 16866

SUSAN W. PALLO
A/K/A SUSAN L. PALLO
725 RADER ROAD
PHILIPSBURG, PA 16866