

07-1340-CD

Citifinancial Serv. Vs R. Rippey

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

157732

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL SERVICES, INC.
605 MUNN RD.
FT. MILL, SC 29715,

COURT OF COMMON PLEAS
CIVIL DIVISION

Plaintiff

v.

TERM

NO. 07-1340-CD

RONALD E. RIPPEY
JOYCE RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837

CLEARFIELD COUNTY

Defendants

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

FILED
Atty pd. 85.00
n/2:05/07
AUG 20 2007
2cc Sheriff
William A. Shaw
Prothonotary/Clerk of Courts

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.

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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

CITIFINANCIAL SERVICES, INC.
605 MUNN RD.
FT. MILL, SC 29715

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

RONALD E. RIPPEY
JOYCE RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837

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

3. On 12/30/2003 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: 200400050. 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 03/15/2007 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	\$35,876.34
Interest	\$1,744.32
02/15/2007 through 08/17/2007	
(Per Diem \$9.48)	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$0.00
12/30/2003 to 08/17/2007	
Cost of Suit and Title Search	<u>\$750.00</u>
Subtotal	\$39,620.66
Escrow	
Credit	\$0.00
Deficit	\$0.00
Subtotal	<u>\$0.00</u>
TOTAL	\$39,620.66

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.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$39,620.66, together with interest from 08/17/2007 at the rate of \$9.48 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

ALL those two certain lots or parcels of ground lying and situate in the Village of Glen Richey, Township of Lawrence, County of Clearfield and Commonwealth of Pennsylvania, bounded and described as follows:

PARCEL NO. 1:

BEING known and numbered as Lot Number twenty-three (23) in plan of lots of Glen Richey laid out by Peale, Peacock, and Kerr, Inc., which said plan of lots is attached to and made a part of a certain deed executed by Peale, Peacock, and Kerr, Inc., to Howard M. McGarvey, dated July 13, 1946, and recorded in the Recorder's Office of Clearfield County, Pennsylvania on July 18, 1946, in Deed Book Volume 377, Page 244.

PARCEL NO. 2:

BEGINNING at the southeast corner of Lot No. 23; thence South 31 degrees 28 minutes East, 124.5 feet to a post; thence, South 58 degrees 32 minutes West, 100 feet to a post; thence, North 31 degrees 28 minutes West, 224.1 feet to a post on Second Avenue; thence, North 58 degrees 32 minutes East, 45 feet to a post on line of Lot No. 23; thence by line of Lot No. 23, South 31 degrees 28 minutes East, 100 feet to a post at the southwest corner of Lot no. 23; thence, North 58 degrees 32 minutes East, by line of Lot No. 23, 55 feet to the place of beginning. Containing 16,950 square feet.

EXCEPTING and RESERVING, however, all the coal in, under, and upon the said premises with such mining rights as are reserved in prior deeds in the chain of title and reserving also all oil and gas as reserved in prior deeds in the chain of title.

This Deed is made under and subject to all prior reservations in the chain of title, is made without warranty of any kind, and is intended to convey only such rights as the Grantors may have, if any.

BEING the same premises conveyed to Elaine G. Rippey, single, as her sole and separate property, by Deed of Clarence R. Bloom, widower, his wife, Lula M. Bloom, having passed away on April 16, 1998, dated July 18, 1998 and recorded in Clearfield County Deed and Record Book 1953, Page 105.

PREMISES BEING: 61 PRY AVENUE

PARCEL NO: J10-477-00006

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 of 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 its knowledge, information and belief. Furthermore, counsel intends to substitute a verification from Plaintiff upon receipt.

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



Francis S. Hallinan, Esquire
Attorney for Plaintiff

DATE: 8/17/07

AFFIDAVIT OF SERVICE – CLEARFIELD COUNTY (JMR)

CITIFINANCIAL SERVICES, INC.

Plaintiff

Vs.

RONALD E. RIPPEY

JOYCE RIPPEY

Defendants

SERVE AT: **911 CATSKILL COURT**
VIRGINIA BEACH, VA 23451

TYPE OF ACTION
XX Mortgage Foreclosure

XX Civil Action
NO. 07-1340-CD
File Number 157732

FILED
M/12/38/07
DEC 19 2007
William A. Shaw
Prothonotary/Clerk of Courts

by 11/20/07

SERVED

Served and made known to JOYCE RIPPEY Defendant on the 2 day of November, 2007, at 3:15 o'clock, P. M., at 911 Catskill Court, Virginia Beach, VA.

City 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 residence who refused to give name/relationship.

Manager/Clerk of place of lodging in which Defendant(s) reside(s)

Agent or person in charge of Defendant's office or usual place of business.

_____ and officer of said defendant company.

Other: _____

I, Nancy G. Wood, A Private Process Server and competent adult, being duly sworn according to law, depose and state that I personally handed to Joyce Rippey

I a true and correct copy of the Civil Action Complaint issued in the captioned case on the date and at the address indicated above.

Description: Age 30's Height 5'5" Weight 120 Race white Sex F Other _____

Sworn to and subscribed

Before me this 2 day
Of November, 2007.

Notary: Clare Elizabeth Wallace

reg# 7093944 exp: 6/30/11

Served By: Nancy G. Wood

NOT SERVED

On the _____ day of _____, 20____, at _____ o'clock

_____. M., Defendant NOT FOUND because:

_____ Moved _____ Unknown _____ No Answer _____ Vacant

Other: _____

Sworn to and subscribed

Before me the _____ day
Of _____, 20____.

Notary:

Not Served By: _____

Phelan Hallinan & Schmieg, LLP

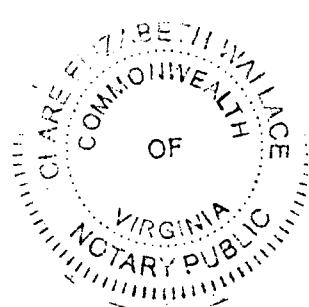
Attorneys For Plaintiff

Francis S. Hallinan, Esquire – I.D.#62695

Suite 1400- One Penn Center Plaza at Suburban Station

Philadelphia, PA 19103-1799

(215)563-7000



IN THE COURT OF COMMON PLEAS, CLEARFIELD COUNTY, PENNSYLVANIA

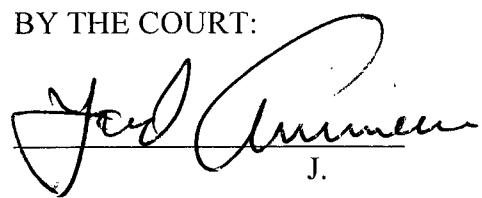
CitiFinancial Services, Inc.	:	Court of Common Pleas
605 Munn Road	:	
Fort Mill, SC 29715	:	
Plaintiff	:	Civil Division
vs.	:	
Ronald E. Rippey	:	Clearfield County
Joyce Rippey	:	
61 Pry Avenue	:	
Glen Richey, PA 16837	:	No. 07-1340-CD
Defendants	:	

ORDER

AND NOW, this 10 day of January, 2008, upon consideration of Plaintiff's Motion to Direct Sheriff to File Affidavit of Service, and any response thereto, it is hereby:

ORDERED and DECREED that the Sheriff of Clearfield County is hereby directed to complete and file an Affidavit of Service of the foreclosure Complaint on Ronald E. Rippey within seven days of the date of this Order.

BY THE COURT:



J.

FILED
01/10/08 2008
JAN 10 2008
Atty Davey

William A. Shaw
Prothonotary/Clerk of Courts
100 Sheriff
(without memo)



FILED
m 11:00 a.m.
JAN 09 2008
6P

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP
BY: Jenine R. Davey, Attorney ID. 87077
One Penn Center at Suburban Station
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

CitiFinancial Services, Inc.
605 Munn Road
Fort Mill, SC 29715
Plaintiff

vs.

Ronald E. Rippey
Joyce Rippey
61 Pry Avenue
Glen Richey, PA 16837
Defendants

ATTORNEY FOR PLAINTIFF

Court of Common Pleas

Civil Division

Clearfield County

No. 07-1340-CD

MOTION TO DIRECT THE SHERIFF TO FILE AFFIDAVIT OF SERVICE

1. Plaintiff commenced the instant mortgage foreclosure action by filing a Complaint on August 20, 2007. 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 Defendant, Ronald E. Rippey.

3. On September 7, 2007, the Sheriff's Office verbally advised counsel for Plaintiff that Ronald E. Rippey accepted service on September 11, 2007.

4. On December 18, 2007, Plaintiff sent the Defendant a ten day letter notifying him 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 September 11, 2007.

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 \$9.48 per day on this mortgage account.

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.

1/8/08
Date

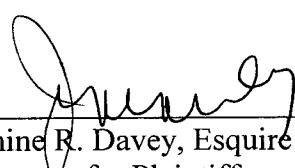

Jenine R. Davey, Esquire
Attorney for Plaintiff

EXHIBIT A

FILED
AUG 20 2007
C
William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
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157732

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL SERVICES, INC.
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COURT OF COMMON PLEAS
CIVIL DIVISION

Plaintiff

v.

TERM

NO. 07-1340-CD

CLEARFIELD COUNTY

RONALD E. RIPPEY
JOYCE RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837

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

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CITIFINANCIAL SERVICES, INC.
605 MUNN RD.
FT. MILL, SC 29715

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

RONALD E. RIPPEY
JOYCE RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837

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3. On 12/30/2003 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: 200400050. 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.
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(Per Diem \$9.48)	
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WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$39,620.66, together with interest from 08/17/2007 at the rate of \$9.48 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

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PARCEL NO. 1:

BEING known and numbered as Lot Number twenty-three (23) in plan of lots of Glen Richey laid out by Peale, Peacock, and Kerr, Inc., which said plan of lots is attached to and made a part of a certain deed executed by Peale, Peacock, and Kerr, Inc., to Howard M. McGarvey, dated July 13, 1946, and recorded in the Recorder's Office of Clearfield County, Pennsylvania on July 18, 1946, in Deed Book Volume 377, Page 244.

PARCEL NO. 2:

BEGINNING at the southeast corner of Lot No. 23; thence South 31 degrees 28 minutes East, 124.5 feet to a post; thence, South 58 degrees 32 minutes West, 100 feet to a post; thence, North 31 degrees 28 minutes West, 224.1 feet to a post on Second Avenue; thence, North 58 degrees 32 minutes East, 45 feet to a post on line of Lot No. 23; thence by line of Lot No. 23, South 31 degrees 28 minutes East, 100 feet to a post at the southwest corner of Lot no. 23; thence, North 58 degrees 32 minutes East, by line of Lot No. 23, 55 feet to the place of beginning. Containing 16,950 square feet.

EXCEPTING and RESERVING, however, all the coal in, under, and upon the said premises with such mining rights as are reserved in prior deeds in the chain of title and reserving also all oil and gas as reserved in prior deeds in the chain of title.

This Deed is made under and subject to all prior reservations in the chain of title, is made without warranty of any kind, and is intended to convey only such rights as the Grantors may have, if any.

BEING the same premises conveyed to Elaine G. Rippey, single, as her sole and separate property, by Deed of Clarence R. Bloom, widower, his wife, Lula M. Bloom, having passed away on April 16, 1998, dated July 18, 1998 and recorded in Clearfield County Deed and Record Book 1953, Page 105.

PREMISES BEING: 61 PRY AVENUE

PARCEL NO: J10-477-00006

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 of 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 its knowledge, information and belief. Furthermore, counsel intends to substitute a verification from Plaintiff upon receipt.

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



Francis S. Hallinan, Esquire
Attorney for Plaintiff

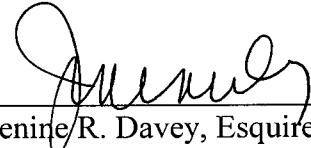
DATE: 8/17/07

VERIFICATION

Jenine R. Davey, 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.

PHELAN HALLINAN & SCHMIEG, LLP

11/8/08
Date



Jenine R. Davey, Esquire
Attorney for Plaintiff

PHELAN HALLINAN & SCHMIEG, LLP
BY: Jenine R. Davey, Attorney ID. 87077
One Penn Center at Suburban Station
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CitiFinancial Services, Inc.	:	Court of Common Pleas
605 Munn Road	:	
Fort Mill, SC 29715	:	
Plaintiff	:	Civil Division
vs.	:	
Ronald E. Rippey	:	Clearfield County
Joyce Rippey	:	
61 Pry Avenue	:	No. 07-1340-CD
Glen Richey, PA 16837	:	
Defendants	:	

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

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

Ronald E. Rippey
61 Pry Avenue
Glen Richey, PA 16837

Joyce Rippey
911 Catskill Court
Virginia Beach, VA 23451

PHELAN HALLINAN & SCHMIEG, LLP

1/8/08
Date



Jenine R. Davey, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103112
NO: 07-1340-CD
SERVICE # 1 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIFINANCIAL SERVICES, INC.
VS.
DEFENDANT: RONALD E. RIPPEY and JOYCE RIPPEY

SHERIFF RETURN

NOW, September 11, 2007 AT 10:36 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON RONALD E. RIPPEY DEFENDANT AT SHERIFF'S OFFICE, 1 N. 2ND ST., SUITE 116, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RONALD RIPPEY, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: DEHAVEN /

FILED

0/2:05 cm
JAN 10 2008

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 2 of 2 Services

Sheriff Docket #

103112

CITIFINANCIAL SERVICES, INC.

Case # 07-1340-CD

vs.

RONALD E. RIPPEY and JOYCE RIPPEY

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW January 10, 2008 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO JOYCE RIPPEY, DEFENDANT. LIVING SOMEWHERE IN VIRGINIA.

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103112
NO: 07-1340-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIFINANCIAL SERVICES, INC.

vs.

DEFENDANT: RONALD E. RIPPEY and JOYCE RIPPEY

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	621141	20.00
SHERIFF HAWKINS	PHELAN	621141	44.37

Sworn to Before Me This

So Answers,

____ Day of _____ 2008


Chester A. Hawkins
Sheriff

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

AUG 20 2007

Attest.

William L. Brown
Prothonotary/
Clerk of Courts

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 157732

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL SERVICES, INC.
605 MUNN RD.
FT. MILL, SC 29715,

COURT OF COMMON PLEAS

Plaintiff

CIVIL DIVISION

v.

TERM

RONALD E. RIPPEY
JOYCE RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837

NO. 07-1340-CD

CLEARFIELD COUNTY

Defendants

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

*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**

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

CITIFINANCIAL SERVICES, INC.
605 MUNN RD.
FT. MILL, SC 29715

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

RONALD E. RIPPEY
JOYCE RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837

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

3. On 12/30/2003 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: 200400050. 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 03/15/2007 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	\$35,876.34
Interest	\$1,744.32
02/15/2007 through 08/17/2007	
(Per Diem \$9.48)	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$0.00
12/30/2003 to 08/17/2007	
Cost of Suit and Title Search	<u>\$750.00</u>
Subtotal	\$39,620.66
Escrow	
Credit	\$0.00
Deficit	\$0.00
Subtotal	<u>\$0.00</u>
TOTAL	\$39,620.66

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.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$39,620.66, together with interest from 08/17/2007 at the rate of \$9.48 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

ALL those two certain lots or parcels of ground lying and situate in the Village of Glen Richey, Township of Lawrence, County of Clearfield and Commonwealth of Pennsylvania, bounded and described as follows:

PARCEL NO. 1:

BEING known and numbered as Lot Number twenty-three (23) in plan of lots of Glen Richey laid out by Peale, Peacock, and Kerr, Inc., which said plan of lots is attached to and made a part of a certain deed executed by Peale, Peacock, and Kerr, Inc., to Howard M. McGarvey, dated July 13, 1946, and recorded in the Recorder's Office of Clearfield County, Pennsylvania on July 18, 1946, in Deed Book Volume 377, Page 244.

PARCEL NO. 2:

BEGINNING at the southeast corner of Lot No. 23; thence South 31 degrees 28 minutes East, 124.5 feet to a post; thence, South 58 degrees 32 minutes West, 100 feet to a post; thence, North 31 degrees 28 minutes West, 224.1 feet to a post on Second Avenue; thence, North 58 degrees 32 minutes East, 45 feet to a post on line of Lot No. 23; thence by line of Lot No. 23, South 31 degrees 28 minutes East, 100 feet to a post at the southwest corner of Lot no. 23; thence, North 58 degrees 32 minutes East, by line of Lot No. 23, 55 feet to the place of beginning. Containing 16,950 square feet.

EXCEPTING and RESERVING, however, all the coal in, under, and upon the said premises with such mining rights as are reserved in prior deeds in the chain of title and reserving also all oil and gas as reserved in prior deeds in the chain of title.

This Deed is made under and subject to all prior reservations in the chain of title, is made without warranty of any kind, and is intended to convey only such rights as the Grantors may have, if any.

BEING the same premises conveyed to Elaine G. Rippey, single, as her sole and separate property, by Deed of Clarence R. Bloom, widower, his wife, Lula M. Bloom, having passed away on April 16, 1998, dated July 18, 1998 and recorded in Clearfield County Deed and Record Book 1953, Page 105.

PREMISES BEING: 61 PRY AVENUE

PARCEL NO: J10-477-00006

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 of 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 its knowledge, information and belief. Furthermore, counsel intends to substitute a verification from Plaintiff upon receipt.

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



Francis S. Hallinan, Esquire
Attorney for Plaintiff

DATE: 8/17/07

PHELAN HALLINAN & SCHMIEG, LLP
BY: Jenine R. Davey, Esquire,
Attorney Identification No. 87077
One Penn Center at Suburban Station
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

CitiFinancial Services, Inc.

605 Munn Road
Fort Mill, SC 29715

Plaintiff

Court of Common Pleas

vs.

Ronald E. Rippey

Joyce Rippey

61 Pry Avenue

Glen Richey, PA 16837

Defendants

Civil Division

Clearfield County

No. 07-1340-CD

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the January 10, 2008 Order granting Plaintiff's 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)

FILED
JAN 17 2008
NOCC
WAS
William A. Shaw
Prothonotary/Clerk of Courts

Ronald E. Rippey
61 Pry Avenue
Glen Richey, PA 16837

Joyce Rippey
911 Catskill Court
Virginia Beach, VA 23451

1/15/08
Date

PHELAN HALLINAN & SCHMIEG, LLP

Jenine R. Davey
Jenine R. Davey, Esquire
Attorney for Plaintiff

CITIFINANCIAL SERVICES, INC.

605 MUNN ROAD

FORT MILL, SC 29715

Plaintiff,

v_o

RONALD E. RIPPEY

61 PRY AVENUE

GLEN RICHEY, PA 16837

JOYCE RIPPEY

911 CATSKILL COURT

VIRGINIA BEACH, VA 23451

2

**CLEARFIELD COUNTY
COURT OF COMMON PLEAS**

CIVIL DIVISION

: NO. 07-1340-CD

•

•

1

Defendant(s):

**PRAEICE 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 **RONALD E. RIPPEY and JOYCE RIPPEY**, 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	\$ 39,620.66
Interest - 08/18/07 TO 02/26/08	\$ 1,829.64
TOTAL	\$ 41,450.30

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. 11

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

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 3/3/08

PRO PROTHY *Bob*

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

CITIFINANCIAL SERVICES, INC.
Plaintiff

Vs.

RONALD E. RIPPEY
JOYCE RIPPEY
Defendants

ATTORNEY FOR PLAINTIFF

: COURT OF COMMON PLEAS
: CIVIL DIVISION
: CLEARFIELD COUNTY
: NO. 07-1340-CD

FILED COPY
K&L

TO: RONALD E. RIPPEY
115 HASTING STREET
BROOKVILLE, PA 15825

DATE OF NOTICE: DECEMBER 18, 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

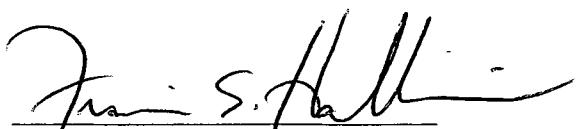
YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT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


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

CITIFINANCIAL SERVICES, INC.

Plaintiff

Vs.

RONALD E. RIPPEY
JOYCE RIPPEY

Defendants

ATTORNEY FOR PLAINTIFF

: COURT OF COMMON PLEAS

: CIVIL DIVISION

: CLEARFIELD COUNTY

: NO. 07-1340-CD

FILE COPY

TO: RONALD E. RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837

DATE OF NOTICE: DECEMBER 18, 2007

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P.O. BOX 186
HARRISBURG, PA 17108
800-692-7375


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

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL SERVICES, INC. : COURT OF COMMON PLEAS
Plaintiff : CIVIL DIVISION
Vs. : CLEARFIELD COUNTY
RONALD E. RIPPEY : NO. 07-1340-CD
JOYCE RIPPEY
Defendants

FILE COPY

TO: JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 23451

DATE OF NOTICE: DECEMBER 18, 2007

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


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

CITIFINANCIAL SERVICES, INC.
Plaintiff

Vs.

RONALD E. RIPPEY
JOYCE RIPPEY

Defendants

ATTORNEY FOR PLAINTIFF

: COURT OF COMMON PLEAS

: CIVIL DIVISION

: CLEARFIELD COUNTY

: NO. 07-1340-CD

TO: JOYCE RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837

DATE OF NOTICE: DECEMBER 18, 2007

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CLEARFIELD COUNTY
DAVID S. MEHOLICK, COURT
ADMINISTRATOR
CLEARFIELD COUNTY COURTHOUSE
CLEARFIELD, PA 16830
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100 SOUTH STREET
P.O. BOX 186
HARRISBURG, PA 17108
800-692-7375



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

CITIFINANCIAL SERVICES, INC.

605 MUNN ROAD

FORT, MILL, SC 29715

Plaintiff,

v.

RONALD E. RIPPEY

61 PRY AVENUE

GLEN RICHEY, PA 16837

JOYCE RIPPEY

911 CATSKILL COURT

VIRGINIA BEACH, VA 23451

Defendant(s).

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 **RONALD E. RIPPEY** is over 18 years of age and resides at **61 PRY AVENUE, GLEN RICHEY, PA 16837**.

(c) that defendant **JOYCE RIPPEY** is over 18 years of age, and resides at **911 CATSKILL COURT, VIRGINIA BEACH, VA 23451**.

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


Daniel G. Schmieg
DANIEL G. SCHMIEG, ESQUIRE

(Rule of Civil Procedure No. 236 - Revised

IN THE COURT OF COMMON PLEAS
CLEARFIELD PENNSYLVANIA



CITIFINANCIAL SERVICES, INC.
605 MUNN ROAD
FORT, MILL, SC 29715

:
:
:
CLEARFIELD COUNTY
COURT OF COMMON PLEAS

Plaintiff,

:
:
CIVIL DIVISION

v.

RONALD E. RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837
JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 23451

:
:
NO. 07-1340-CD

:

:

:

:

:

Defendant(s).

Notice is given that a Judgment in the above captioned matter has been entered against you
on March 3, 2008.

BY Willie H. Chan DEPUTY
BA

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

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

COPY

Citifinancial Services, Inc.
Plaintiff(s)

No.: 2007-01340-CD

Real Debt: \$41,450.30

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Ronald E. Rippey
Joyce Rippey
Defendant(s)

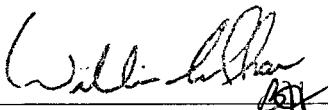
Entry: \$20.00

Instrument: In Rem Judgment

Date of Entry: March 3, 2008

Expires: March 3, 2013

Certified from the record this 3rd day of March, 2008.



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

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

CITIFINANCIAL SERVICES, INC.

vs.

RONALD E. RIPPEY

JOYCE RIPPEY

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No. 07-1340-CD Term 20.....

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	\$41,450.30
------------	-------------

Interest from 02/27/08 to Sale	\$ _____.
--------------------------------	-----------

Per diem \$6.81	
-----------------	--

Add'l Costs	\$3,350.00
-------------	------------

Writ Total	\$
------------	----

Prothonotary costs \$125-

Daniel S. Schmieg
Attorney for the Plaintiff(s)

Note: Please attach description of Property.

157732

FILED

MAR 28 2008

12:45 PM
William A. Shaw
Prothonotary/Clerk of Courts
1 CEN w/6
Writ to
Shaw

No. 07-1340-CD Term 20 A.D.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CITIFINANCIAL SERVICES, INC.

vs.

RONALD E. RIPPEY
JOYCE RIPPEY

PRAECEIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed:



.....
Attorney for Plaintiff(s)

Address: RONALD E. RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837
JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 23451

LEGAL DESCRIPTION

ALL those two certain lots or parcels of ground lying and situate in the Village of Glen Richey, Township of Lawrence, County of Clearfield and Commonwealth of Pennsylvania, bounded and described as follows:

PARCEL NO. 1:

BEING known and numbered as Lot Number twenty-three (23) in plan of lots of Glen Richey laid out by Peale, Peacock, and Kerr, Inc., which said plan of lots is attached to and made a part of a certain deed executed by Peale, Peacock, and Kerr, Inc., to Howard M. McGarvey, dated July 13, 1946, and recorded in the Recorder's Office of Clearfield County, Pennsylvania on July 18, 1946, in Deed Book Volume 377, Page 244.

PARCEL NO. 2:

BEGINNING at the southeast corner of Lot No. 23; thence South 31 degrees 28 minutes East, 124.5 feet to a post; thence, South 58 degrees 32 minutes West, 100 feet to a post; thence, North 31 degrees 28 minutes West, 224.1 feet to a post on Second Avenue; thence, North 58 degrees 32 minutes East, 45 feet to a post on line of Lot No. 23; thence by line of Lot No. 23, South 31 degrees 28 minutes East, 100 feet to a post at the southwest corner of Lot no. 23; thence, North 58 degrees 32 minutes East, by line of Lot No. 23, 55 feet to the place of beginning. Containing 16,950 square feet.

EXCEPTING and RESERVING, however, all the coal in, under, and upon the said premises with such mining rights as are reserved in prior deeds in the chain of title and reserving also all oil and gas as reserved in prior deeds in the chain of title.

This Deed is made under and subject to all prior reservations in the chain of title, is made without warranty of any kind, and is intended to convey only such rights as the Grantors may have, if any.

BEING the same premises conveyed to Elaine G. Rippey, single, as her sole and separate property, by Deed of Clarence R. Bloom, widower, his wife, Lula M. Bloom, having passed away on April 16, 1998, dated July 18, 1998 and recorded in Clearfield County Deed and Record Book 1953, Page 105.

RECORD OWNER

TITLE TO SAID PREMISES IS VESTED IN Ronald Rippey and Joyce Rippey, husband and wife as tenants by the Entireties, by Deed from Elaine G. Rippey, a single adult individual, dated 08/23/2001, recorded 08/28/2001, in Deed Mortgage Inst# 200113574.

Premises being: **61 PRY AVENUE**
GLEN RICHEY, PA 16837

Tax Parcel No. **123-J10-477-00006**

CITIFINANCIAL SERVICES, INC.
605 MUNN ROAD
FORT, MILL, SC 29715

:
: **CLEARFIELD COUNTY**
: **COURT OF COMMON PLEAS**

Plaintiff,

v.

RONALD E. RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837
JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 23451

: **CIVIL DIVISION**

: **NO. 07-1340-CD**

:

:

:

Defendant(s).

AFFIDAVIT PURSUANT TO RULE 3129

CITIFINANCIAL SERVICES, INC., Plaintiff in the above action, by its attorney, DANIEL G. SCHMIEG, ESQUIRE, sets forth as of the date the Praeclipe for the Writ of Execution was filed, the following information concerning the real property located at **61 PRY AVENUE, GLEN RICHEY, PA 16837**.

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

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

None

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

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

None

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

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

None

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

61 PRY AVENUE
GLEN RICHEY, PA 16837

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.

02/26/08

Date


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

**CITIFINANCIAL SERVICES, INC.
605 MUNN ROAD
FORT, MILL, SC 29715**

**CLEARFIELD COUNTY
COURT OF COMMON PLEAS**

CIVIL DIVISION

NO. 07-1340-CD

**RONALD E. RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837
JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 234**

Defendant(s).

**AFFIDAVIT PURSUANT TO RULE 3129
(Affidavit No.1)**

CITIFINANCIAL SERVICES, INC., Plaintiff in the above action, by its attorney, DANIEL G. SCHMIEG, ESQUIRE, sets forth as of the date the Praeclipe for the Writ of Execution was filed, the following information concerning the real property located at **61 PRY AVENUE, GLEN RICHEY, PA 16837**.

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

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

RONALD E. RIPPEY **61 PRY AVENUE**
GLEN RICHEY, PA 16837

JOYCE RIPPEY **61 PRY AVENUE**
GLEN RICHEY, PA 16837

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.

02/26/08

Date

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

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

CITIFINANCIAL SERVICES, INC. :
605 MUNN ROAD :
FORT, MILL, SC 29715 :

Plaintiff,

v.

RONALD E. RIPPEY :
61 PRY AVENUE :
GLEN RICHEY, PA 16837 :
JOYCE RIPPEY :
911 CATSKILL COURT :
VIRGINIA BEACH, VA 23451 :

Defendant(s).

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

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

CITIFINANCIAL SERVICES, INC.

vs.

RONALD E. RIPPEY

JOYCE RIPPEY

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No. Term 20
No. 07-1340-CD Term 20
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: 61 PRY AVENUE, GLEN RICHEY, PA 16837
(See Legal Description attached)

Amount Due	\$41,450.30
Interest from 02/27/08 to Sale	\$ _____.
Per diem \$6.81	
Add'l Costs	\$3,350.00
Writ Total	\$

Prothonotary costs *f 125.00*

Welle
(Clerk) Office of the Prothonotary, Common Pleas Court
of CLEARFIELD County, Penna.

Dated 3-28-08
(SEAL)

157732

No. 07-1340-CD..... Term 20A.D.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

CITIFINANCIAL SERVICES, INC.

vs.

RONALD E. RIPPEY
JOYCE RIPPEY

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Real Debt \$41,450.30

Int. from 02/27/08
To Date of Sale (\$6.81 per diem)

Costs

Prothly Pd.

Sheriff

Daniel S. Denney

Attorney for Plaintiff(s)

Address: RONALD E. RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837
JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 23451

LEGAL DESCRIPTION

ALL those two certain lots or parcels of ground lying and situate in the Village of Glen Richey, Township of Lawrence, County of Clearfield and Commonwealth of Pennsylvania, bounded and described as follows:

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BEING known and numbered as Lot Number twenty-three (23) in plan of lots of Glen Richey laid out by Peale, Peacock, and Kerr, Inc., which said plan of lots is attached to and made a part of a certain deed executed by Peale, Peacock, and Kerr, Inc., to Howard M. McGarvey, dated July 13, 1946, and recorded in the Recorder's Office of Clearfield County, Pennsylvania on July 18, 1946, in Deed Book Volume 377, Page 244.

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EXCEPTING and RESERVING, however, all the coal in, under, and upon the said premises with such mining rights as are reserved in prior deeds in the chain of title and reserving also all oil and gas as reserved in prior deeds in the chain of title.

This Deed is made under and subject to all prior reservations in the chain of title, is made without warranty of any kind, and is intended to convey only such rights as the Grantors may have, if any.

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RECORD OWNER

TITLE TO SAID PREMISES IS VESTED IN Ronald Rippey and Joyce Rippey, husband and wife as tenants by the Entireties, by Deed from Elaine G. Rippey, a single adult individual, dated 08/23/2001, recorded 08/28/2001, in Deed Mortgage Inst# 200113574.

Premises being: **61 PRY AVENUE**
GLEN RICHEY, PA 16837

Tax Parcel No. **123-J10-477-00006**

AFFIDAVIT OF SERVICE

PLAINTIFF CITIFINANCIAL SERVICES, INC.

DEFENDANT(S) RONALD E. RIPPEY
JOYCE RIPPEY

Please serve upon: RONALD E. RIPPEY

SERVE AT: 61 PRY AVENUE
GLEN RICHEY, PA 16837

CLEARFIELD County
No. 07-1340-CD
Our File #: 157732

Type of Action
- Notice of Sheriff's Sale

Sale Date: June 6, 2008

FILED
MAY 07 2008
NO CC
William A. Shaw
Prothonotary/Clerk of Courts

SERVED

Served and made known to Ronald E. Rippey, Defendant, on the 29th day of APRIL,
2008, at 11:08, o'clock A.m., at 61 PRY AVE., GLEN RICHEY, PA 16837,

Commonwealth of Pennsylvania, in the manner described below:

Defendant personally served.
 Adult family member with whom Defendant(s) reside(s). Relationship is Son / GARY RIPPEY
 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 35 Height 5'6 Weight 350 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 30th day
of APRIL, 2008

Notary:

By: D.M. Ellis

Marilyn A. Campbell
COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Marilyn A. Campbell, Notary Public
City Of Altoona, Blair County
My Commission Expires Dec. 6, 2011
Member, Pennsylvania Association of Notaries

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

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

CITIFINANCIAL SERVICES, INC.	:	CLEARFIELD COUNTY
Plaintiff,	:	COURT OF COMMON PLEAS
v.	:	
	:	CIVIL DIVISION
RONALD E. RIPPEY	:	
JOYCE RIPPEY	:	NO. 07-1340-CD
Defendant(s)	:	

AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF CLEARFIELD) SS:

Plaintiff in the above action sets forth as of the date the Praecept for the Writ of Execution was filed the following information concerning the real property located at: 61 PRY AVENUE, GLEN RICHEY, PA 16837.

As required by Pa. R.C.P. 3129.2(a) Notice of Sale has been given to Lienholders 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 Affidavit No. 2 (previously filed) and/or Amended Affidavit No. 2 on the date indicated. 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: May 5, 2008

IMPORTANT NOTICE: This property is sold at the direction of the plaintiff. It may not be sold in the absence of a representative of the plaintiff at the Sheriff's Sale. The sale must be postponed or stayed in the event that a representative of the plaintiff is not present at the sale.

157732

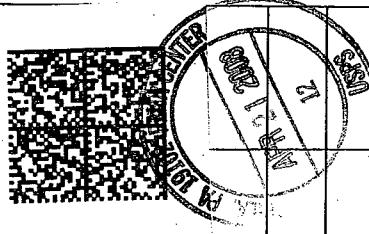
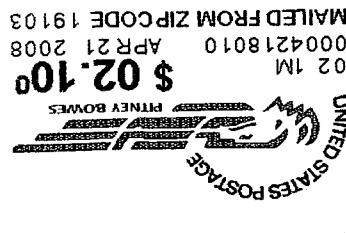
FILED
MAY 07 2008
NOCC
William A. Shaw
Prothonotary/Clerk of Courts

Name and
Address
of Sender

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

AZK

Line No.	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee
1	1	TENANT/OCCUPANT 61 PRY AVENUE GLEN RICHEY, PA 16837		
2	2	DOMESTIC RELATIONS CLEARFIELD COUNTY CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830		
3	3	COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF WELFARE PO BOX 2675 HARRISBURG, PA 17105		
4	4	Commonwealth of Pennsylvania, Bureau of Individual Tax, Inheritance Tax Division, 6 th Floor, Strawberry Sq., Dept 28061, Harrisburg, PA 17128		
5	5	Internal Revenue Service, Federated Investors Tower, 13 TH Floor, Suite 1300, 1001 Liberty Avenue, Pittsburgh, PA 15222		
6	6	Department of Public Welfare, TPL Casualty Unit, Estate Recovery Program, P.O. Box 8486, Willow Oak Building, Harrisburg, PA 17105		
7	7			
8	8			
9	9			
10	10			
11	11			
12	12	Re: RONALD E. RIPPEY	157732	TEAM 4
Total Number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$300. The maximum indemnity payable is \$25,000 for registered mail, sent with optional insurance. See Domestic Mail Manual R900, S913 and S921 for limitations of coverage.



M3B

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20754
NO: 07-1340-CD

PLAINTIFF: CITIFINANCIAL SERVICES, INC.
vs.
DEFENDANT: RONALD E. RIPPEY AND JOYCE RIPPEY
Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 3/28/2008

LEVY TAKEN 4/22/2008 @ 1:30 PM

POSTED 4/22/2008 @ 1:30 PM

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 8/14/2008

DATE DEED FILED

PROPERTY ADDRESS 61 PRY AVENUE GLEN RICHEY , PA 16837

FILED

19:09 60
AUG 14 2008

William A. Shaw
Prothonotary/Clerk of Courts

SERVICES

SEE ATTACHED SHEET(S) OF SERVICES

SHERIFF HAWKINS \$219.60

SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This

So Answers,

____ Day of _____ 2008

Chester A. Hawkins

Joy Cummins Beller Clearfield
Chester A. Hawkins
Sheriff

CITIFINANCIAL SERVICES, INC.

vs
RONALD E. RIPPEY AND JOYCE RIPPEY

1 @ SERVED RONALD E. RIPPEY

UNABLE TO SERVE RONALD E. RIPPEY, DEFENDANT, AT HIS RESIDENCE 61 PRY AVENUE, GLEN RICHEY, CLEARFIELD COUNTY, PENNSYLVANIA BECAUSE THE DEFENDANT NO LONGER RESIDES AT THAT ADDRESS.

2 @ SERVED JOYCE RIPPEY

UNABLE TO SERVE JOYCE RIPPEY, DEFENDANT, AT HER RESIDENCE 61 PRY AVENUE, GLEN RICHEY, CLEARFIELD COUNTY, PENNSYLVANIA BECAUSE THE DEFENDANT NO LONGER RESIDES AT THAT ADDRESS.

3 @ SERVED RONALD RIPPEY

NOW, APRIL 24, 2008 DEPUTIZED JEFFERSON COUNTY TO SERVE RONALD RIPPEY.

4 5/5/2008 @ SERVED RONALD RIPPEY

NOW, MAY 5, 2008 RECEIVED JEFFERSON COUNTY RETURN. JEFFERSON COUNTY UNABLE TO SERVE RONALD E. RIPPEY, DEFENDANT AT 115 HASTINGS STREET, JEFFERSON COUNTY, PENNSYLVANIA, BECAUSE HE MOVED AND

5 4/24/2008 @ SERVED JOYCE RIPPEY

SERVED JOYCE RIPPEY, DEFENDANT, BY REG & CERT MAIL TO 911 CATSKILL COURT, VIRGINIA BEACH, VA 23451. REG MAIL RETURNED UNCLAIMED 5/1/08, CERT RETURNED 5/10/08.

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF THE LEVY.

@ SERVED

NOW, MAY 22, 2008 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULDED FOR JUNE 6, 2008 TO SEPTEMBER 5, 2008.

@ SERVED

NOW, JUNE 6, 2008 RECEIVED A FAX LETTER TO STAY THE SHERIFF SALE SCHEDULED FOR JUNE 6, 2008.

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

CITIFINANCIAL SERVICES, INC.

vs.

RONALD E. RIPPEY

JOYCE RIPPEY

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No. Term 20
No. 07-1340-CD Term 20
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: 61 PRY AVENUE, GLEN RICHEY, PA 16837
(See Legal Description attached)

Amount Due	\$41,450.30
Interest from 02/27/08 to Sale	\$ _____
Per diem \$6.81	
Add'l Costs	\$3,350.00
Writ Total	\$

Prothonotary costs \$125. -

Dated 3-28-08
(SEAL)

157732

Received this writ this 28th day
of March A.D. 2008
At 3:00 A.M./P.M.

Chester A. Hawkins
Sheriff by Cynthia Miller-Augustine

No. 07-1340-CD Term 20A.D.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CITIFINANCIAL SERVICES, INC.

vs.

RONALD E. RIPPEY
JOYCE RIPPEY

W^{RE}IT OF EXECUTION
(Mortgage Foreclosure)

Costs	
Real Debt	\$41,450.30
Int. from 02/27/08 To Date of Sale (\$6.81 per diem)	
Costs	
Proth ^y Pd.	
Sheriff	<i>Daniel S. Denney</i>

Address: RONALD E. RIPPEY
61 PRY AVENUE
GLEN RICHEY, PA 16837

JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 23451

Attorney for Plaintiff(s)

LEGAL DESCRIPTION

ALL those two certain lots or parcels of ground lying and situate in the Village of Glen Richey, Township of Lawrence, County of Clearfield and Commonwealth of Pennsylvania, bounded and described as follows:

PARCEL NO. 1:

BEING known and numbered as Lot Number twenty-three (23) in plan of lots of Glen Richey laid out by Peale, Peacock, and Kerr, Inc., which said plan of lots is attached to and made a part of a certain deed executed by Peale, Peacock, and Kerr, Inc., to Howard M. McGarvey, dated July 13, 1946, and recorded in the Recorder's Office of Clearfield County, Pennsylvania on July 18, 1946, in Deed Book Volume 377, Page 244.

PARCEL NO. 2:

BEGINNING at the southeast corner of Lot No. 23; thence South 31 degrees 28 minutes East, 124.5 feet to a post; thence, South 58 degrees 32 minutes West, 100 feet to a post; thence, North 31 degrees 28 minutes West, 224.1 feet to a post on Second Avenue; thence, North 58 degrees 32 minutes East, 45 feet to a post on line of Lot No. 23; thence by line of Lot No. 23, South 31 degrees 28 minutes East, 100 feet to a post at the southwest corner of Lot no. 23; thence, North 58 degrees 32 minutes East, by line of Lot No. 23, 55 feet to the place of beginning. Containing 16,950 square feet.

EXCEPTING and RESERVING, however, all the coal in, under, and upon the said premises with such mining rights as are reserved in prior deeds in the chain of title and reserving also all oil and gas as reserved in prior deeds in the chain of title.

This Deed is made under and subject to all prior reservations in the chain of title, is made without warranty of any kind, and is intended to convey only such rights as the Grantors may have, if any.

BEING the same premises conveyed to Elaine G. Rippey, single, as her sole and separate property, by Deed of Clarence R. Bloom, widower, his wife, Lula M. Bloom, having passed away on April 16, 1998, dated July 18, 1998 and recorded in Clearfield County Deed and Record Book 1953, Page 105.

RECORD OWNER

TITLE TO SAID PREMISES IS VESTED IN Ronald Rippey and Joyce Rippey, husband and wife as tenants by the Entireties, by Deed from Elaine G. Rippey, a single adult individual, dated 08/23/2001, recorded 08/28/2001, in Deed Mortgage Inst# 200113574.

Premises being: **61 PRY AVENUE**
GLEN RICHEY, PA 16837

Tax Parcel No. **123-J10-477-00006**

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME RONALD E. RIPPEY

NO. 07-1340-CD

NOW, August 14, 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 , I exposed the within described real estate of Ronald E. Rippey And Joyce Rippey to public venue or outcry at which time and place I sold the same to he/she being the highest bidder, for the sum of and made the following appropriations, viz:

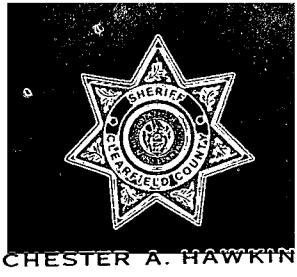
SHERIFF COSTS:

PLAINTIFF COSTS, DEBT AND INTEREST:

RDR SERVICE	15.00	DEBT-AMOUNT DUE	41,450.30
MILEAGE	15.00	INTEREST @ 6.8100	0.00
LEVY	7.07	FROM TO	
MILEAGE	15.00	ATTORNEY FEES	
POSTING	7.07	PROTH SATISFACTION	
CSDS	15.00	LATE CHARGES AND FEES	
COMMISSION	10.00	COST OF SUIT-TO BE ADDED	
POSTAGE	0.00	FORECLOSURE FEES	
HANDBILLS	11.46	ATTORNEY COMMISSION	
DISTRIBUTION	15.00	REFUND OF ADVANCE	
ADVERTISING	25.00	REFUND OF SURCHARGE	40.00
ADD'L SERVICE	15.00	SATISFACTION FEE	
DEED		ESCROW DEFICIENCY	
ADD'L POSTING		PROPERTY INSPECTIONS	
ADD'L MILEAGE		INTEREST	
ADD'L LEVY		MISCELLANEOUS	
BID/SETTLEMENT AMOUNT		TOTAL DEBT AND INTEREST	\$41,490.30
RETURNS/DEPUTIZE	9.00		
COPIES	15.00	COSTS:	
	5.00	ADVERTISING	507.94
BILLING/PHONE/FAX	5.00	TAXES - COLLECTOR	
CONTINUED SALES	20.00	TAXES - TAX CLAIM	
MISCELLANEOUS		DUE	
TOTAL SHERIFF COSTS	\$219.60	LIEN SEARCH	
		ACKNOWLEDGEMENT	
ACKNOWLEDGEMENT		DEED COSTS	0.00
REGISTER & RECORDER		SHERIFF COSTS	219.60
TRANSFER TAX 2%	0.00	LEGAL JOURNAL COSTS	126.00
TOTAL DEED COSTS	\$0.00	PROTHONOTARY	125.00
		MORTGAGE SEARCH	
		MUNICIPAL LIEN	
		TOTAL COSTS	\$978.54

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



CHESTER A. HAWKINS
SHERIFF

Sheriff's Office Clearfield County

COURTHOUSE
1 NORTH SECOND STREET, SUITE 116
CLEARFIELD, PENNSYLVANIA 16830

OFFICE (814) 765-2641
FAX (814) 765-5915
ROBERT SNYDER
CHIEF DEPUTY
MARILYN HAMM
DEPT. CLERK
CYNTHIA AUGHENBAUGH
OFFICE MANAGER
KAREN BAUGHMAN
CLERK TYPIST
PETER F. SMITH
SOLICITOR

DEPUTATION

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 20754

TERM & NO. 07-1340-CD

CITIFINANCIAL SERVICES, INC.
VS.
RONALD E. RIPPEY AND JOYCE RIPPEY

DOCUMENTS TO BE SERVED:
NOTICE OF SALE
WRIT OF EXECUTION
COPY OF LEVY

SERVE BY: ASAP

**MAKE REFUND PAYABLE TO ATTORNEY'S OFFICE
RETURN TO BE SENT TO THIS OFFICE**

SERVE: RONALD RIPPEY

ADDRESS: 115 HASTINGS STREET
BROOKVILLE, PA 15825

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby depelize the SHERIFF OF JEFFERSON COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, Thursday, April 24, 2008.

RESPECTFULLY

CHESTER A. HAWKINS,
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

No. 07-1340 C.D.

Now, April 29, 2008 I return the Notice of Sale, Writ of Execution and the Copy of Levy for RONALD E. RIPPEY, Defendant, to the Clearfield County Sheriff's Office marked "not found; defendant has moved and left no forwarding address with the Post Office".

Advance Costs Received:	\$125.00	
My Costs:	20.00	Paid
Prothy:	2.00	
Total Costs:	22.00	
REFUNDED:	\$103.00	

So Answers,

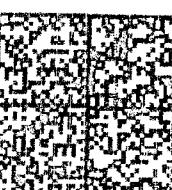
Sworn and subscribed
to before me this 1st
day of May 2008
By Kristen J. Hoffman
Deputy Clerk of Courts

My Commission Expires the
1st Monday, January 2010

Carl J. Gotwald Sr Sheriff
JEFFERSON COUNTY, PENNSYLVANIA



CHESTER A. HAWKINS
SHERIFF
COURTHOUSE
1 NORTH SECOND STREET - SUITE 116
CLEARFIELD, PENNSYLVANIA 16830



Hasler

016H16503405

\$00.580

04/24/2008

Mailed From 16830
US POSTAGE

JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 23451

CR

MXRE 235 DE 4 00 04/29/08

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

EC: 16830247201 *1843-02271-24-41

234314420-16830247201

MAIL PREPAID
POSTAGE PAID
TO THE RECIPIENT
BY THE SENDER

SENDER: COMPLETE THIS SECTION**COMPLETE THIS SECTION ON DELIVERY**

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

1. Article Addressed to:

JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 23451

A. Signature Agent
X Addressee

B. Received by (Printed Name) C. Date of Delivery

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

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

Yes

2. Article Number

(Transfer from service label)

7006 0810 0001 4507 4142

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540



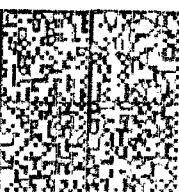


CHESTER A. HAWKINS
SHERIFF

1 NORTH SECOND STREET - SUITE 116
CLEARFIELD, PENNSYLVANIA 16830



7006 0810 0001 4507 4142



Hasler

\$05.380
04/24/2008
Mailed From 16830

US POSTAGE

Loc
S10/08

UP

JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 23451

NOT DELIVERABLE
AS ADDRESSED
UNABLE TO FORWARD

QC
1R

4507 4142
2006 0001

**U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)**

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	5.38

2006
Sent To
Street, Apt. No.:
or P.O. Box No.
City, State, Zip 44

JOYCE RIPPEY
911 CATSKILL COURT
VIRGINIA BEACH, VA 23451

CLEARFIELD PA
Postmaster
Here
APR 24 2008
USPS

Phelan Hallinan & Schmieg, L.L.P.
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Fax: (215) 563-7009

Foreclosure Manager

Representing Lenders in
Pennsylvania and New Jersey

May 22, 2008

Office of the Sheriff
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830

Attn: Real Estate Department

Fax Number: 814-765-5915

Re: CITIFINANCIAL SERVICES, INC. v.
RONALD E. RIPPEY and JOYCE RIPPEY
61 PRY AVENUE GLEN RICHEY, PA 16837
Court No. 07-1340-CD

Dear Sir/Madam:

Please Postpone the Sheriff Sale of the above referenced property, which is scheduled for June 6, 2008 due to the following: Service Of Nos.

The Property is to be relisted for the September 5, 2008 Sheriff Sale.

Thank you for your correspondence in this matters.

Very Truly Yours,
SUE FRUIT for
Phelan Hallinan & Schmieg, LLP

Phelan Hallinan & Schmieg, L.L.P.
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Fax: (215) 563-7009

Foreclosure Manager

Representing Lenders in
Pennsylvania and New Jersey

June 6, 2008

Office of the Sheriff
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830

Attn: Real Estate Department

Fax Number: 814-765-5915

Re: CITIFINANCIAL SERVICES, INC. v.
RONALD E. RIPPEY and JOYCE RIPPEY
61 PRY AVENUE GLEN RICHEY, PA 16837
Court No. 07-1340-CD

Dear Sir/Madam:

Please STAY the Sheriff's Sale of the above referenced property, which is scheduled for June 6, 2008 due to the following: Per Client.

\$0.00 was received in consideration of the stay. Please be advised that no funds were reported to be received.

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

Please return the original Writ of Execution to the Prothonotary as soon as possible..

Thank you for your correspondence in this matter.

Very Truly Yours,
CHRISTINE SCHOFFLER for
Phelan Hallinan & Schmieg, LLP