



PHELAN HALLINAN & SCHMIEG, LLP  
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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

TERM

v.

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**

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

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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. Meholick, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

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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>
<b>TOTAL</b>	<b>\$39,620.66</b>

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

TYPE OF ACTION  
**XX** Mortgage Foreclosure

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

William A. Shaw  
Prothonotary/Clerk of Courts

**FILED** NO  
m/12:38/07  
DEC 19 2007

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

**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

1 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: \_\_\_\_\_

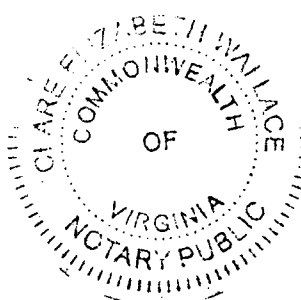
Sworn to and subscribed

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.  
605 Munn Road  
Fort Mill, SC 29715  
Plaintiff

vs.

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

Court of Common Pleas

Civil Division

Clearfield County

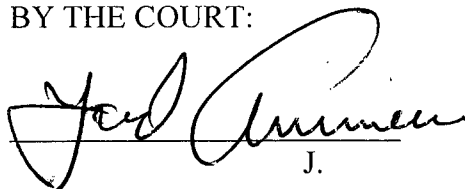
No. 07-1340-CD

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  
019:4054  
JAN 10 2008

William A. Shaw  
Prothonotary/Clerk of Courts

1cc Sheriff  
(without memo)

OK

FILED No. cc  
m 11:00  
JAN 09 2008

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.

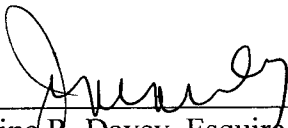
5. To date, the Clearfield County Sheriff's Office has not filed the Affidavit of Service, which was made on September 11, 2007.

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.

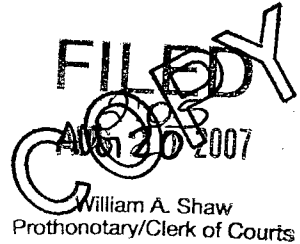
WHEREFORE, Plaintiff respectfully requests that the Court enter an Order directing the Sheriff of Clearfield County to file the Affidavit of Service of the Complaint with the Prothonotary within seven days.

1/8/08  
Date

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

## **EXHIBIT A**





PHELAN HALLINAN & SCHMIEG, LLP  
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157732

CITIFINANCIAL SERVICES, INC.  
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Defendants

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 07-1340-CD

CLEARFIELD COUNTY

**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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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

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6. The following amounts are due on the mortgage:

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Subtotal	\$39,620.66
Escrow	
Credit	\$0.00
Deficit	\$0.00
Subtotal	<u>\$0.00</u>
<b>TOTAL</b>	<b>\$39,620.66</b>

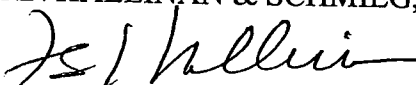
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WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$39,620.66, together with interest from 08/17/2007 at the rate of \$9.48 per diem to the date of Judgment, and other costs and charges collectible under the mortgage 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

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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### 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.

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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

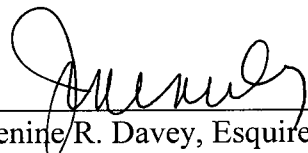
DATE: 8/17/07

**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

1/8/08  
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.  
605 Munn Road  
Fort Mill, SC 29715  
Plaintiff

vs.

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

: Court of Common Pleas  
:  
:  
: Civil Division  
:  
:  
: Clearfield County  
:  
:  
: No. 07-1340-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

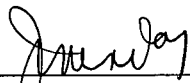
Peter F. Smith, Esquire  
30 South 2<sup>nd</sup> Street  
PO Box 130  
Clearfield, PA 16830-2347  
(Sheriff's Solicitor)

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**

0/3:05 am  
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

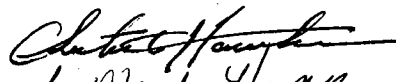
RETURN COSTS

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

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,

  
by Maudy Harris

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. Shaw*  
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

CIVIL DIVISION

Plaintiff

TERM

v.

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**

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  
2<sup>nd</sup> 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>
<b>TOTAL</b>	<b>\$39,620.66</b>

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.

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

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

Civil Division

vs.

Clearfield County

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

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. 2<sup>nd</sup> Street,  
PO Box 130  
Clearfield, PA 16830-2347  
(Sheriff's Solicitor)

**FILED**  
JAN 17 2008

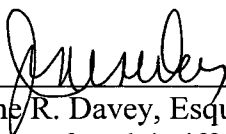
William A. Shaw  
Prothonotary/Clerk of Courts

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

Joyce Rippey  
911 Catskill Court  
Virginia Beach, VA 23451

PHELAN HALLINAN & SCHMIEG, LLP

\_\_\_\_\_  
Date 4/15/08

\_\_\_\_\_  
  
Jenine R. Davey, 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 Attorney for Plaintiff  
(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).

CLEARFIELD COUNTY  
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 07-1340-CD

**FILED** *Atty pd. 20.00*  
*m/12:16/08*  
MAR 03 2008 *icco Notice to Defs.*  
William A. Shaw  
Prothonotary/Clerk of Courts  
*Statement to Atty*  
*(GR)*

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 **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	<u>\$41,450.30</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: 3/3/08

*William A. Shaw*  
PRO PROTHY

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.  
Plaintiff

: COURT OF COMMON PLEAS

: CIVIL DIVISION

Vs.

: CLEARFIELD COUNTY

RONALD E. RIPPEY  
JOYCE RIPPEY

: NO. 07-1340-CD

Defendants

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

FILE COPY

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

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL SERVICES, INC.  
Plaintiff

: COURT OF COMMON PLEAS

Vs.

: CIVIL DIVISION

RONALD E. RIPPEY  
JOYCE RIPPEY

Defendants

: CLEARFIELD COUNTY

: NO. 07-1340-CD

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

FILE COPY

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#### IMPORTANT NOTICE

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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 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.  
Plaintiff

: COURT OF COMMON PLEAS

Vs.

: CIVIL DIVISION

RONALD E. RIPPEY  
JOYCE RIPPEY

Defendants

: CLEARFIELD COUNTY

: NO. 07-1340-CD

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

FILE COPY

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

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL SERVICES, INC.  
Plaintiff

: COURT OF COMMON PLEAS

Vs.

: CIVIL DIVISION

RONALD E. RIPPEY  
JOYCE RIPPEY

: CLEARFIELD COUNTY

Defendants

: NO. 07-1340-CD

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

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


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

  
FRANCIS S. HALLINAN, ESQUIRE  
Attorneys for Plaintiff



IN THE COURT OF COMMON PLEAS  
CLEARFIELD PENNSYLVANIA

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).

CLEARFIELD COUNTY  
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 07-1340-CD

COPIES

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

BY William L. Schmiege DEPUTY  
CLERK

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)

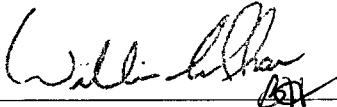
Entry: \$20.00

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)

**FILED**

MAR 28 2008  
12:45 PM  
William A. Shaw  
Prothonotary/Clerk of Courts  
1 cent w/6  
writ to  
sheriff

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 J. Schmieg*

Attorney for the Plaintiff(s)

Note: Please attach description of Property.

157732

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

\_\_\_\_\_

PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)

Filed:

\_\_\_\_\_

*Daniel D. Schweg*  
Attorney for Plaintiff(s)

Address: RONALD E. RIPPEY      JOYCE RIPPEY  
61 PRY AVENUE      911 CATSKILL COURT  
GLEN RICHEY, PA 16837      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**

**v. Plaintiff,**

**Defendant(s).**

**NO. 07-1340-CD**

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 COURTHOUSE  
CLEARFIELD COUNTY 230 EAST MARKET STREET  
CLEARFIELD, PA 16830

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF WELFARE  
PO BOX 2675  
HARRISBURG, PA 17105

Commonwealth of Pennsylvania 6<sup>th</sup> Floor, Strawberry Sq., Dept 28061  
Bureau of Individual Tax Harrisburg, PA 17128  
Inheritance Tax Division

Internal Revenue Service 13<sup>TH</sup> Floor, Suite 1300  
Federated Investors Tower 1001 Liberty Avenue  
Pittsburgh, PA 15222

Department of Public Welfare P.O. Box 8486  
TPL Casualty Unit Willow Oak Building  
Estate Recovery Program 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

  
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).**

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

**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
------------	-------------

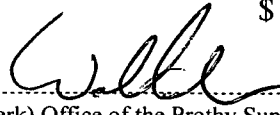
Interest from 02/27/08 to Sale	\$ _____.
--------------------------------	-----------

Per diem \$6.81

Add'l Costs

Writ Total

Prothonotary costs \$125.00	\$3,350.00
	\$

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

Dated 3-28-08  
(SEAL)

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

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

Prothy Pd.

Sheriff

*Daniel S. Schmeig*

Attorney for Plaintiff(s)

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

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

## SERVED

Served and made known to Ronald E. Rippey, Defendant, on the 29<sup>th</sup> 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 30<sup>th</sup> day  
of APRIL, 2008

Notary:

By: DMEllis

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.  
Plaintiff,  
v.

RONALD E. RIPPEY  
JOYCE RIPPEY  
Defendant(s)

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

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 Praecipe 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** *no cc*  
*MAY 07 2008*  
William A. Shaw  
Prothonotary/Clerk of Courts

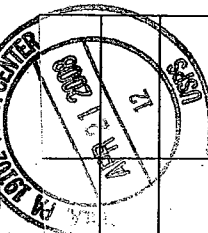
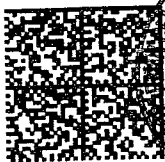


Name and  
Address  
of Sender

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

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee
1		TENANT/OCCUPANT 61 PRY AVENUE GLEN RICHEY, PA 16837		
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 <sup>th</sup> Floor, Strawberry Sq., Dept 28061, Harrisburg, PA 17128		
5		Internal Revenue Service, Federated Investors Tower, 13 <sup>TH</sup> 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				
8				
9				
10				
11				
12		<b>Re: RONALD E. RIPPEY</b>	<b>157732</b>	<b>TEAM 4</b>
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 \$500. 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.

UNITED STATES POSTAGE  
\$ 02.10  
02 1M  
0004218010  
APR 21 2008  
MAILED FROM ZIP CODE 19103  
PTINNEY BOWES



M33

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

07:09:01  
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

\_\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,


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, DEFENANT, 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 RICHY, 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, VIRGINAI 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 SCHEDULED FOR JUNE 6, 2008 TO SEPTEMBER 5, 2008.

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@ 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

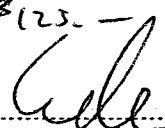
Add'l Costs

Writ Total

Prothonotary costs \$125. -

\$3,350.00

\$

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

Dated 3-28-08  
(SEAL)

157732

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

Christa A. Hawkins  
Sheriff by Cynthia Ketter-Aufderlau

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

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

Prothy Pd.

Sheriff

*Donal S. Schmeig*

Attorney for Plaintiff(s)

Address: RONALD E. RIPPEY  
61 PRY AVENUE

JOYCE RIPPEY  
911 CATSKILL COURT  
GLEN RICHEY, PA 16837 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**

**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:**

RDR	15.00
SERVICE	15.00
MILEAGE	7.07
LEVY	15.00
MILEAGE	7.07
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	11.46
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID/SETTLEMENT AMOUNT	
RETURNS/DEPUTIZE	9.00
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	20.00
MISCELLANEOUS	

**TOTAL SHERIFF COSTS \$219.60**

**DEED COSTS:**

ACKNOWLEDGEMENT	
REGISTER & RECORDER	
TRANSFER TAX 2%	0.00
<b>TOTAL DEED COSTS</b>	<b>\$0.00</b>

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	41,450.30
INTEREST @ 6.8100	0.00
FROM TO	
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	

**TOTAL DEBT AND INTEREST \$41,490.30**

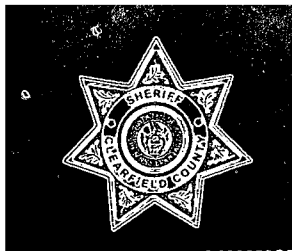
**COSTS:**

ADVERTISING	507.94
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	
ACKNOWLEDGEMENT	
DEED COSTS	0.00
SHERIFF COSTS	219.60
LEGAL JOURNAL COSTS	126.00
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 deputize 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

Carl J. Lotwold Sr Sheriff  
JEFFERSON COUNTY, PENNSYLVANIA

My Commission Expires the  
1st Monday, January 2010



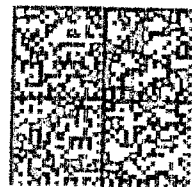
CHESTER A. HAWKINS  
SHERIFF  
COURTHOUSE  
1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830

*CR*

JOYCE RIPLEY  
911 CATSKILL COURT  
VIRGINIA BEACH, VA 23451

234514220-168302472

NIXIE 235 DE 1 00 04/29/08  
RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD  
BC: 16830247201 \*1643-02271-24-41



Hasler

016H16505405  
\$00.580  
04/24/2008  
Mailed From 16830  
US POSTAGE

**CERTIFIED MAIL**

**COMPLETE THIS SECTION ON DELIVERY**

- A. Signature**  
**X**
- ☐ Agent  
☐ Addressee

C. Date of Delivery

☐ Yes

☐ No

PA 16830  
USPS  
MAY 9 - 1971

## 1. Article Addressed to:

3. Service Type ☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

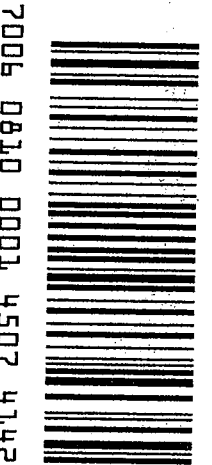
4. Restricted Delivery? (Extra Fee) ☐ Yes

7006 0810 0001 4507 42424 2000 0180 9002

102595-02-M-1540



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



Hasler

016-16505405  
\$05.380  
04/24/2008  
Billed From 16830  
US POSTAGE

Rec'd  
5/16/08

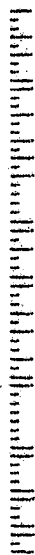
UP

JOYCE RIPPEY  
911 CATSKILL COURT  
VIRGINIA BEACH, VA 23451

NOT DELIVERABLE  
AS ADDRESSED,  
UNABLE TO FORWARD

2C  
12

2345134580 0027

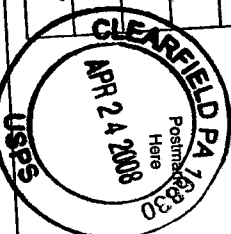


U.S. Postal Service<sup>TM</sup>  
CERTIFIED MAIL<sup>TM</sup> RECEIPT  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at [www.usps.com](http://www.usps.com)

OFFICIAL USE

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



Sent To  
Street, Apt. No.,  
or PO Box No.  
City, State, ZIP+4  
JOYCE RIPPEY  
911 CATSKILL COURT  
VIRGINIA BEACH, VA 23451

PS Form 3800, June 2002 See Reverse for Instructions

**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

PHS # 157732

**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**

Representing Lenders in  
Pennsylvania and New Jersey

Foreclosure Manager

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 matters.

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

PHS # 157732