

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

162577

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR FFMLT
2006-FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
150 ALLEGHENY CENTER MALL
IDC 24-050
PITTSBURGH, PA 15212

Plaintiff

v.
TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801

Defendants

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 07-1599-CD

CLEARFIELD COUNTY

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

FILED
M/11:25/07
OCT 01 2007
William A. Shaw
Prothonotary/Clerk of Court
Atty pd. 85.00
8cc 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
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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

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR FFMLT
2006-FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
150 ALLEGHENY CENTER MALL
IDC 24-050
PITTSBURGH, PA 15212

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

TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801

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

3. On 12/21/2005 mortgagor(s) made, executed, and delivered a mortgage upon the premises hereinafter described to MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. AS A NOMINEE FOR FIRST FRANKLIN A DIVISION OF NATIONAL CITY BANK OF INDIANA which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No: 200602387. PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same. 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 05/01/2007 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	\$37,636.56
Interest	\$1,576.80
04/01/2007 through 09/27/2007 (Per Diem \$8.76)	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$58.44
12/21/2005 to 09/27/2007	
Cost of Suit and Title Search	<u>\$750.00</u>
Subtotal	\$41,271.80
Escrow	
Credit	\$0.00
Deficit	\$0.00
Subtotal	<u>\$0.00</u>
TOTAL	\$41,271.80

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 \$41,271.80, together with interest from 09/27/2007 at the rate of \$8.76 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 that certain piece, tract or parcel of land lying and being in the City of DuBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a post at Lot No. 115; thence by Lot No. 115, North 22 degrees 28 minutes West 150 feet to an alley; thence by said alley, North 68 degrees East 75 feet to a post; thence by other land conveyed to John Reed, 150 feet to a post on Evergreen Street, 68 feet Northeast of the place of beginning; thence by Evergreen Street, 68 degrees West 68 feet to the place of beginning. Being known as Lot No. 62 and Lot No. 114 of Alfred Bell's Addition to the Borough (now City) of DuBois.

BEING the same premises which were conveyed to Ronald E. Koloskee and David L. Koloskee by deed of George Koloskee, et al., dated February 18, 1991 and recorded at Clearfield, Pennsylvania, in Deeds and Records Book No. 1388, page 159.

PROPERTY BEING: 187 EAST MAIN STREET

FILED

NOV 09 2007

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP

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

One Penn Center at Suburban Station

1617 J.F.K. Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

Deutsche Bank National Trust Company, as Trustee :
for FFMLT 2006-FF4, Mortgage Pass-Through :

Certificates, Series 2006-FF4 :

150 Allegheny Center Mall, IDC 24-050 :

Pittsburgh, PA 15212 :

Plaintiff :

vs. :

Travis L. Clouser :

Lara J. Clouser :

133 Evergreen Street :

DuBois, PA 15801 :

Defendants :

ATTORNEY FOR PLAINTIFF

Court of Common Pleas

Clearfield County

Civil Division

No. 07-1599-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:

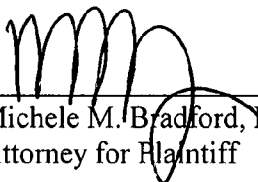
Chester A. Hawkins
Sheriff of Clearfield County
230 East Market Street
Clearfield, PA 16830

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

Travis L. Clouser
Lara J. Clouser
133 Evergreen Street
DuBois, PA 15801

11/7/07
Date

PHELAN HALLINAN & SCHMIEG, LLP



Michele M. Bradford, Esquire
Attorney for Plaintiff

UP

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

<u>Deutsche Bank National Trust Company, as Trustee :</u> for FFMLT 2006-FF4, Mortgage Pass-Through : Certificates, Series 2006-FF4 : 150 Allegheny Center Mall, IDC 24-050 : Pittsburgh, PA 15212 : <div style="text-align: right;">Plaintiff :</div>	Court of Common Pleas Clearfield County Civil Division
vs. :	
Travis L. Clouser : Lara J. Clouser : 133 Evergreen Street : DuBois, PA 15801 : <div style="text-align: right;">Defendants :</div>	No. 07-1599-CD

ORDER

AND NOW, this 14th day of November, 2007, 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 the foreclosure Complaint within seven days of the date of this Order.

FILED
012:13/50
NOV 15 2007
William A. Shaw
Prothonotary/Clerk of Courts
ICC Atty
ICC Sheriff
without memo
CR

BY THE COURT:
Judith J. Ammann
J.

DATE: 10/19/11

☒ You are responsible for serving all appropriate parties.
The Probationary's office has provided service to the following parties:
Plaintiff(s) _____ Plaintiff(s) Attorney _____ Other _____
Defendant(s) _____ Defendant(s) Attorney _____
Special Instructions: _____

William A. Shaw
Probationary/Clerk of Courts

NOV 15 2007

FILED

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

Deutsche Bank National Trust Company, as Trustee :	Court of Common Pleas
for FFMLT 2006-FF4, Mortgage Pass-Through :	
Certificates, Series 2006-FF4 :	
150 Allegheny Center Mall, IDC 24-050 :	Clearfield County
Pittsburgh, PA 15212 :	
Plaintiff :	
vs. :	Civil Division
Travis L. Clouser :	
Lara J. Clouser :	No. 07-1599-CD
133 Evergreen Street :	
DuBois, PA 15801 :	
Defendants :	

RULE

AND NOW, this _____ day of _____ 2007, a Rule is entered upon the Defendants and/or the Sheriff of Clearfield County to show cause why an Order should not be entered granting Plaintiff's Motion to Direct Sheriff to File Affidavit of Service.

Rule Returnable on the _____ day of _____ 2007, at _____ at the Clearfield County Courthouse, Clearfield Pennsylvania.

BY THE COURT,

J.

FILED ^{NO CC}
m 11:05/61
NOV 09 2007 @

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP

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

ATTORNEY FOR PLAINTIFF

One Penn Center at Suburban Station

1617 J.F.K. Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

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150 Allegheny Center Mall, IDC 24-050 :
Pittsburgh, PA 15212 :

Court of Common Pleas

Clearfield County

Plaintiff

Civil Division

vs.

Travis L. Clouser

Lara J. Clouser

133 Evergreen Street

DuBois, PA 15801

No. 07-1599-CD

Defendants

MOTION TO DIRECT THE SHERIFF TO FILE AFFIDAVIT OF SERVICE

1. Plaintiff commenced the instant mortgage foreclosure action by filing a Complaint on October 1, 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 Defendants.

3. On November 2, 2007, the Sheriff's Office verbally advised counsel for Plaintiff that Travis L. Clouser was personally served the Complaint on behalf of himself and his wife on October 11, 2007.

4. On November 2, 2007, Plaintiff sent the Defendants ten day letters notifying them of its intention to file a default judgment.

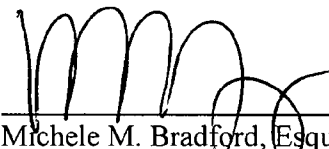
5. To date, the Clearfield County Sheriff's Office has not filed the affidavit of service, which was made on October 11, 2007.

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 \$8.76 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.

11/7/07
Date



Michele M. Bradford, Esquire
Attorney for Plaintiff

PHELAN HALLINAN & SCHMIEG, LLP

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

ATTORNEY FOR PLAINTIFF

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Deutsche Bank National Trust Company, as Trustee :
for FFMLT 2006-FF4, Mortgage Pass-Through :

Court of Common Pleas

Certificates, Series 2006-FF4 :

150 Allegheny Center Mall, IDC 24-050 :

Clearfield County

Pittsburgh, PA 15212 :

Plaintiff :

Civil Division

vs. :

Travis L. Clouser :

No. 07-1599-CD

Lara J. Clouser :

133 Evergreen Street :

DuBois, PA 15801 :

Defendants :

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

I. PROCEDURAL HISTORY

Plaintiff commenced the instant mortgage foreclosure action by filing a Complaint on October 1, 2007. A true and correct copy of the Complaint is attached hereto, made part hereof, and marked as Exhibit "A". The Sheriff of Clearfield County was requested to serve the Complaint upon the Defendants. On November 2, 2007, the Sheriff's Office verbally advised counsel for Plaintiff that Travis L. Clouser was personally served the Complaint on behalf of

himself and his wife on October 11, 2007. On November 2, 2007, Plaintiff sent the Defendants ten day letters notifying them of its intention to file a default judgment. To date, the Clearfield County Sheriff's Office has not filed the affidavit of service, which was made on October 11, 2007. 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 \$8.76 per day on this mortgage account.

II. LEGAL ANALYSIS

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

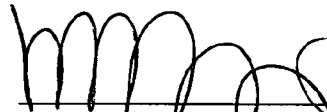
When service of the original process has been made,
the sheriff or other person making service shall make a
return of service forthwith. . . .

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

Plaintiff is without an adequate remedy at law and will suffer irreparable harm unless the requested relief is granted. This Court has plenary power to administer equity according to well-settled principals of equity jurisprudence in cases under its jurisdiction. Cheval v. City of Philadelphia, 176 A. 779, 116 Pa. Super. 101 (1935). Moreover, it is well settled that Courts will lean to a liberal exercise of the equity power conferred upon them instead of encouraging technical niceties in the modes of procedure and forms of pleading. Gunnet v. Trout, 380 Pa. 504, 112 A.2d 333 (1955). This is certainly a case where the exercise of this Court's equity powers is appropriate and necessary.

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

11/7/07
Date



Michele M. Bradford, Esquire
Attorney for Plaintiff

EXHIBIT A

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
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2006-FF4, MORTGAGE PASS-THROUGH
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150 ALLEGHENY CENTER MALL
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COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO.

CLEARFIELD COUNTY

Plaintiff

v.
TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
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CIVIL ACTION - LAW
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2006-FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
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PITTSBURGH, PA 15212

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

TRAVIS L. CLOUSER
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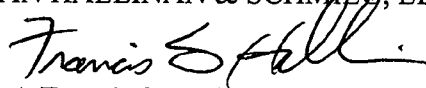
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discharged in bankruptcy, but only to foreclose the mortgage and sell the mortgaged premises pursuant to Pennsylvania Law.

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PHELAN HALLINAN & SCHMIEG, LLP



By: /s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

DANIEL G. SCHMIEG, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

LEGAL DESCRIPTION

ALL that certain piece, tract or parcel of land lying and being in the City of DuBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a post at Lot No. 115; thence by Lot No. 115, North 22 degrees 28 minutes West 150 feet to an alley; thence by said alley, North 68 degrees East 75 feet to a post; thence by other land conveyed to John Reed, 150 feet to a post on Evergreen Street, 68 feet Northeast of the place of beginning; thence by Evergreen Street, 68 degrees West 68 feet to the place of beginning. Being known as Lot No. 62 and Lot No. 114 of Alfred Bell's Addition to the Borough (now City) of DuBois.

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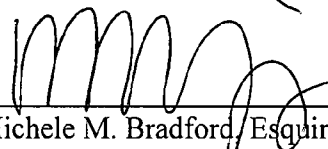
PROPERTY BEING: 187 EAST MAIN STREET

VERIFICATION

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

11/7/07
Date

PHELAN HALLINAN & SCHMIEG, LLP



Michele M. Bradford, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103253
NO: 07-1599-CD
SERVICE # 1 OF 6
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY , as Trustee

vs.

DEFENDANT: TRAVIS L. CLOUSER and LARA J. CLOUSER

SHERIFF RETURN

NOW, October 11, 2007 AT 11:17 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON TRAVIS L. CLOUSER DEFENDANT AT 133 EVERGREEN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TRAVIS CLOUSER, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

FILED
11/21/07
NOV 16 2007

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103253
NO: 07-1599-CD
SERVICE # 2 OF 6
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY , as Trustee

vs.

DEFENDANT: TRAVIS L. CLOUSER and LARA J. CLOUSER

SHERIFF RETURN

NOW, October 11, 2007 AT 11:17 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON LARA J. CLOUSER DEFENDANT AT 133 EVERGREEN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TRAVIS CLOUSER, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103253
NO: 07-1599-CD
SERVICE # 3 OF 6
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY , as Trustee
vs.
DEFENDANT: TRAVIS L. CLOUSER and LARA J. CLOUSER

SHERIFF RETURN

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SERVED BY: NEVLING /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103253
NO: 07-1599-CD
SERVICE # 4 OF 6
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY , as Trustee

vs.

DEFENDANT: TRAVIS L. CLOUSER and LARA J. CLOUSER

SHERIFF RETURN

NOW, October 11, 2007 AT 11:17 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON LARA J. CLOUSER DEFENDANT AT 133 EVERGREEN ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO TRAVIS CLOUSER, HUSBAND A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: NEVLING /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103253
NO: 07-1599-CD
SERVICE # 5 OF 6
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY , as Trustee
vs.
DEFENDANT: TRAVIS L. CLOUSER and LARA J. CLOUSER

SHERIFF RETURN

NOW, October 02, 2007, SHERIFF OF JEFFERSON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON TRAVIS L. CLOUSER.

NOW, October 12, 2007 ATTEMPTED TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON TRAVIS L. CLOUSER, DEFENDANT. THE RETURN OF JEFFERSON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN MARKED "NOT FOUND".

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103253
NO: 07-1599-CD
SERVICE # 6 OF 6
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY , as Trustee
vs.
DEFENDANT: TRAVIS L. CLOUSER and LARA J. CLOUSER

SHERIFF RETURN

NOW, October 02, 2007, SHERIFF OF JEFFERSON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON LARA J. CLOUSER.

NOW, October 12, 2007 ATTEMPTED TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON LARA J. CLOUSER, DEFENDANT. THE RETURN OF JEFFERSON COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN MARKED "NOT FOUND".

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

DOCKET # 103253
NO: 07-1599-CD
SERVICES 6
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY , as Trustee
vs.
DEFENDANT: TRAVIS L. CLOUSER and LARA J. CLOUSER

SHERIFF RETURN

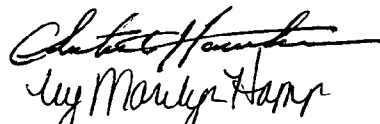
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	631470	60.00
SHERIFF HAWKINS	PHELAN	631470	40.00
JEFFERSON CO.	PHELAN	631478	39.46
SHERIFF HAWKINS			44.86

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,



Chester A. Hawkins
Sheriff

No. 07-1599 C.D.

Now, October 12, 2007 I return the Notice and Complaint in Mortgage Foreclosure for TRAVIS L. CLOUSER and LARA J. CLOUSER, Defendants, to the Clearfield County Sheriff's Office marked "not found; defendants are currently residing at 133 Evergreen Street, DuBois, PA which is located in Clearfield County".

Advance Costs Received:	\$125.00	
My Costs:	37.46	Paid
Prothy:	2.00	
Total Costs:	39.46	
REFUNDED:	\$ 85.54	

Sworn and subscribed

to before me this 16th

day of October 2007

By Kristen J. Hoffman
DEPUTY CLERK OF COURTS

My Commission Expires the
1st Monday, January 2010

So Answers,

Thomas A. Demko Sheriff
JEFFERSON COUNTY, PENNSYLVANIA

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 162577

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR FFMLT
2006-FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
150 ALLEGHENY CENTER MALL
IDC 24-050
PITTSBURGH, PA 15212

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 07-1599-CD

CLEARFIELD COUNTY

Plaintiff

v.
TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801

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
PHELAN

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

OCT 01 2007

File #: 162577

Attest.

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.

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.

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Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
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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**

1

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

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR FFMLT
2006-FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
150 ALLEGHENY CENTER MALL
IDC 24-050
PITTSBURGH, PA 15212

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

TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801

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

3. On 12/21/2005 mortgagor(s) made, executed, and delivered a mortgage upon the premises hereinafter described to MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. AS A NOMINEE FOR FIRST FRANKLIN A DIVISION OF NATIONAL CITY BANK OF INDIANA which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No: 200602387. PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same. 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 05/01/2007 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	\$37,636.56
Interest	\$1,576.80
04/01/2007 through 09/27/2007 (Per Diem \$8.76)	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$58.44
12/21/2005 to 09/27/2007	
Cost of Suit and Title Search	<u>\$750.00</u>
Subtotal	\$41,271.80
Escrow	
Credit	\$0.00
Deficit	\$0.00
Subtotal	<u>\$0.00</u>
TOTAL	\$41,271.80

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 \$41,271.80, together with interest from 09/27/2007 at the rate of \$8.76 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

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PROPERTY BEING: 187 EAST MAIN STREET

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FRANCIS S. HALLINAN, ESQ., Id. No. 62695
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COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 07-1599-CD

CLEARFIELD COUNTY

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v.
TRAVIS L. CLOUSER
LARA J. CLOUSER
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CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

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Attest.

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By: /s/Francis S. Hallinan

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FRANCIS S. HALLINAN, ESQUIRE

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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 162577

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR FFMLT
2006-FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
150 ALLEGHENY CENTER MALL
IDC 24-050
PITTSBURGH, PA 15212

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 07-1544-CD

CLEARFIELD COUNTY

Plaintiff

v.

TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801

Defendants

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

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

OCT 01 2007

File #: 162577

Attest.

William L. H...
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. 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

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR FFMLT
2006-FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
150 ALLEGHENY CENTER MALL
IDC 24-050
PITTSBURGH, PA 15212

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

TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801

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

3. On 12/21/2005 mortgagor(s) made, executed, and delivered a mortgage upon the premises hereinafter described to MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. AS A NOMINEE FOR FIRST FRANKLIN A DIVISION OF NATIONAL CITY BANK OF INDIANA which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No: 200602387. PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same. 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 05/01/2007 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	\$37,636.56
Interest	\$1,576.80
04/01/2007 through 09/27/2007 (Per Diem \$8.76)	
Attorney's Fees	\$1,250.00
Cumulative Late Charges 12/21/2005 to 09/27/2007	\$58.44
Cost of Suit and Title Search	<u>\$750.00</u>
Subtotal	\$41,271.80
Escrow	
Credit	\$0.00
Deficit	\$0.00
Subtotal	<u>\$0.00</u>
TOTAL	\$41,271.80

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 \$41,271.80, together with interest from 09/27/2007 at the rate of \$8.76 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 that certain piece, tract or parcel of land lying and being in the City of DuBois, Clearfield County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a post at Lot No. 115; thence by Lot No. 115, North 22 degrees 28 minutes West 150 feet to an alley; thence by said alley, North 68 degrees East 75 feet to a post; thence by other land conveyed to John Reed, 150 feet to a post on Evergreen Street, 68 feet Northeast of the place of beginning; thence by Evergreen Street, 68 degrees West 68 feet to the place of beginning. Being known as Lot No. 62 and Lot No. 114 of Alfred Bell's Addition to the Borough (now City) of DuBois.

BEING the same premises which were conveyed to Ronald E. Koloskee and David L. Koloskee by deed of George Koloskee, et al., dated February 18, 1991 and recorded at Clearfield, Pennsylvania, in Deeds and Records Book No. 1388, page 159.

PROPERTY BEING: 187 EAST MAIN STREET

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
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PHILADELPHIA, PA 19103
(215) 563-7000 162577

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR FFMLT
2006-FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
150 ALLEGHENY CENTER MALL
IDC 24-050
PITTSBURGH, PA 15212

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 07-1599-CD

CLEARFIELD COUNTY

Plaintiff

v.
TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801

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
PHELAN

I hereby certify this to be a true
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OCT 01 2007

Attest.

William A. ...
Prothonotary/
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2006-FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
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IDC 24-050
PITTSBURGH, PA 15212

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TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801

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PHELAN HALLINAN & SCHMIEG, LLP



By: /s/Francis S. Hallinan

LAWRENCE T. PHELAN, ESQUIRE

DANIEL G. SCHMIEG, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE

Attorneys for Plaintiff

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PROPERTY BEING: 187 EAST MAIN STREET

FILED NO CC
m/1:04/07
NOV 26 2007
William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire

Attorney ID No. 69849

One Penn Center at Suburban Station

1617 J.F.K. Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

Deutsche Bank National Trust Company, as Trustee :

for FFMLT 2006-FF4, Mortgage Pass-Through :

Certificates, Series 2006-FF4 :

150 Allegheny Center Mall, IDC 24-050 :

Pittsburgh, PA 15212 :

Plaintiff :

Court of Common Pleas

Clearfield County

Civil Division

vs. :

Travis L. Clouser :

Lara J. Clouser :

133 Evergreen Street :

DuBois, PA 15801 :

Defendants :

No. 07-1599-CD

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of Order granting Motion to Direct Sheriff to

File Affidavit of Service were served upon the following interested parties via first class mail on

the date indicated below:

Chester A. Hawkins

Sheriff of Clearfield County

230 East Market Street

Clearfield, Pennsylvania 16830

Peter F. Smith, Esquire

30 S. 2nd Street,

PO Box 130


Clearfield, PA 16830-2347

(Sheriff's Solicitor)

Travis L. Clouser
Lara J. Clouser
133 Evergreen Street
DuBois, PA 15801

11/20/07
Date

PHELAN HALLINAN & SCHMIEG, LLP



Michele M. Bradford, Esquire
Attorney for Plaintiff

FILED

NOV 26 2007

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG

By: DANIEL G. SCHMIEG

Identification No. 62205

One Penn Center at Suburban Station - Suite 1400

1617 John F. Kennedy Boulevard

Philadelphia, PA 19103-1814

(215) 563-7000

Attorney for Plaintiff

FILED

JAN 07 2008

William A. Shaw
Prothonotary/Clerk of Courts

Any pd. 20.00

1 cc Notice

to Def.

Statement to

Any

**DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR FFMLT 2006-
FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
150 ALLEGHENY CENTER MALL, IDC 24-
050
PITTSBURGH, PA 15212**

Plaintiff,

v.

**TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801**

**CLEARFIELD COUNTY
COURT OF COMMON PLEAS**

CIVIL DIVISION

NO. 07-1599-CD

Defendant(s).

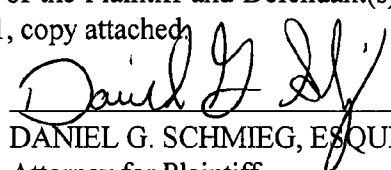
**PRAECIPE FOR IN REM JUDGMENT FOR FAILURE TO
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE OFFICE OF THE PROTHONOTARY:

Kindly enter an in rem judgment in favor of the Plaintiff and against **TRAVIS L. CLOUSER and LARA J. CLOUSER**, 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	\$ 41,271.80
Interest - 09/28/07 TO 01/04/08	\$867.24
TOTAL	<u>\$ 42,139.04</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, ESQUIRE
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 1/7/08


PRO PROTHY

162577

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

DEUTSCHE BANK NATIONAL TRUST COMPANY, : COURT OF COMMON PLEAS
AS TRUSTEE FOR FFMLT 2006-FF4, MORTGAGE
PASS-THROUGH CERTIFICATES, SERIES 2006-FF4 : CIVIL DIVISION
Plaintiff

Vs.

: CLEARFIELD COUNTY

: NO. 07-1599-CD

TRAVIS L. CLOUSER
LARA J. CLOUSER
Defendants

TO: TRAVIS L. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801

FILE COPY

DATE OF NOTICE: NOVEMBER 2, 2007

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

IMPORTANT NOTICE

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

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

PENNSYLVANIA LAWYER REFERRAL
SERVICE
PENNSYLVANIA BAR ASSOCIATION
100 SOUTH STREET
P.O. BOX 186
HARRISBURG, PA 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
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Philadelphia, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST COMPANY, : COURT OF COMMON PLEAS
AS TRUSTEE FOR FFMLT 2006-FF4, MORTGAGE
PASS-THROUGH CERTIFICATES, SERIES 2006-FF4 : CIVIL DIVISION
Plaintiff

Vs.

: CLEARFIELD COUNTY

: NO. 07-1599-CD

TRAVIS L. CLOUSER
LARA J. CLOUSER

Defendants

TO: LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801

FILE COPY

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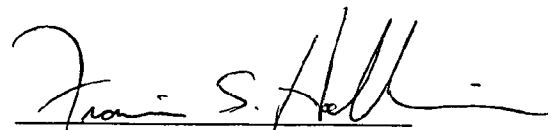
YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT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

**DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR FFMLT 2006-
FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
150 ALLEGHENY CENTER MALL, IDC 24-
050
PITTSBURGH, PA 15212**

Plaintiff,

v.

**TRAVIS L. CLOUSER
LARA J. CLOUSER
133 EVERGREEN STREET
DU BOIS, PA 15801**

**CLEARFIELD COUNTY
COURT OF COMMON PLEAS**

CIVIL DIVISION

NO. 07-1599-CD

Defendant(s).

VERIFICATION OF NON-MILITARY SERVICE

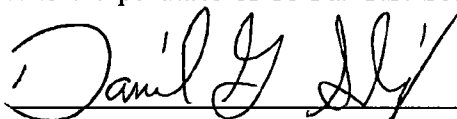
DANIEL G. SCHMIEG, ESQUIRE, hereby verifies that he is attorney for the Plaintiff in the above-captioned matter, and that on information and belief, he has knowledge of the following facts, to wit:

(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 **TRAVIS L. CLOUSER** is over 18 years of age and resides at **133 EVERGREEN STREET, DU BOIS, PA 15801**.

(c) that defendant **LARA J. CLOUSER** is over 18 years of age, and resides at **133 EVERGREEN STREET, DU BOIS, PA 15801**.

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


DANIEL G. SCHMIEG, ESQUIRE

(Rule of Civil Procedure No. 236 - Revised)

COPY

IN THE COURT OF COMMON PLEAS
CLEARFIELD PENNSYLVANIA

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR FFMLT 2006-
FF4, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-FF4
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Plaintiff,

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133 EVERGREEN STREET
DU BOIS, PA 15801

Defendant(s).

CLEARFIELD COUNTY
COURT OF COMMON PLEAS
CIVIL DIVISION
NO. 07-1599-CD

Notice is given that a Judgment in the above captioned matter has been entered against you
on January 7, 2008.

BY [Signature] DEPUTY
Bd

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

[Signature]
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

Deutsche Bank National Trust Company
Plaintiff(s)

No.: 2007-01599-CD

Real Debt: \$42,139.04

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Travis L. Clouser
Lara J. Clouser
Defendant(s)

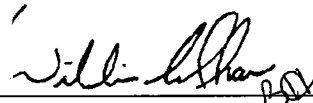
Entry: \$20.00

Instrument: In Rem Judgment

Date of Entry: January 7, 2008

Expires: January 7, 2013

Certified from the record this 7th day of January, 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