

07-1761-CD
Cliffhancial vs Sharon K. Young et al

GOLDBECK McCAFFERTY & McKEEVER

BY: JOSEPH A. GOLDBECK, JR.
ATTORNEY I.D. #16132
SUITE 5000 – MELLON INDEPENDENCE CENTER
701 MARKET STREET
PHILADELPHIA, PA 19106
(215) 627-1322
WWW.GOLDBECKLAW.COM
ATTORNEY FOR PLAINTIFF

FILED *Atty pd. 85.00*
m/12:46
OCT 31 2007 *2cc Sheriff*

William A. Shaw
Prothonotary/Clerk of Courts *(Signature)*

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
Mortgagors and Real Owners
846 Clover Street
Philipsburg, PA 16866

Defendants

IN THE COURT OF COMMON PLEAS

OF CLEARFIELD COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term *07-1761-CD*

CIVIL ACTION: MORTGAGE FORECLOSURE

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 the 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 claim 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 OR CANNOT AFFORD ONE, 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.

KEYSTONE LEGAL SERVICES
211 1/2 E. Locust Street
Clearfield, PA 16830
814-765-9646

PENNSYLVANIA BAR ASSOCIATION
P.O. Box 186
Harrisburg, PA 17108
800-692-7375

A V I S O

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESNTADAS, ES ABSOLUTAMENTE NECESSARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESSARIO QUE USTED, O SU ABOGADO, REGISTRE CON LA CORTE EN FORMA ESCRITA, EL PUNTO DE VISTA DE USTED Y CUALQUIER OBJECCION CONTRA LAS QUEJAS EN ESTA DEMANDA.

RECUERDE: SI USTED NO REPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIRA QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

USTED DEBE LLEVAR ÉSTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELÉFONO LA OFICINA FIJADA AQUÍ ABAJO. ESTA OFICINA PUEDE PROVEERÉ CON INFORMACIÓN DE CÔMO CONSEUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ÉSTA OFICINA PUEDE PROVEERÉ INFORMACION ACERCA AGENCIAS QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

KEYSTONE LEGAL SERVICES
211 1/2 E. Locust Street
Clearfield, PA 16830
814-765-9646

PENNSYLVANIA BAR ASSOCIATION
P.O. Box 186
Harrisburg, PA 17108
800-692-7375

THIS FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.

Resources available for Homeowners in Foreclosure

ACT NOW!

Even though your lender (and our client) has filed an Action of Mortgage Foreclosure against you, you still may be able to SAVE YOUR HOME FROM FORECLOSURE.

- 1). Call an attorney. For referrals to a qualified attorney call either of the following numbers: 814-765-9646 or 800-692-7375.
- 2). Call the Consumer Credit Counseling Agency at 1-800-989-2227 for free counseling.
- 3). Visit HUD'S website www.hud.gov for Help for Homeowners Facing the Loss of Their Homes.
- 4). Call the Plaintiff (your lender) at and ask to speak to someone about Loss Mitigation or Home Retention options.
- 5). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout / Home Retention Package. Call our toll free number at 1-866-413-2311 or via email at homeretention@goldbecklaw.com. Call Seth at 215-825-6329 or fax 215-825-6429. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is David Fein who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of 57853FC.

Para informacion en espanol puede comunicarse con Loretta al 215-825-6344.

This Action of Mortgage Foreclosure will continue unless you take action to stop it.

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff is CITIFINANCIAL SERVICES, INC., 1111 Northpoint Drive, Building 4, Suite 100 Coppel, TX 75019.
2. The names and addresses of the Defendants are SHARON K. YOUNG, 846 Clover Street, Philipsburg, PA 16866 and RICHARD L. YOUNG, 846 Clover Street, Philipsburg, PA 16866, who are the mortgagors and real owners of the mortgaged premises hereinafter described.
3. On October 10, 2003 mortgagors made, executed and delivered a mortgage upon the Property hereinafter described to CITIFINANCIAL SERVICES, INC., which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Instrument #200318528. The Mortgage and assignment(s) are matters of public record and are incorporated by this reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g); which Rule relieves the Plaintiff from its obligation to attach documents to pleadings if those documents are matters of public record.
4. The Property subject to the Mortgage is more fully described in the legal description set forth as Exhibit "A" ("Property").
5. The mortgage is in default because the monthly payments of principal and interest are due and unpaid for July 16, 2007 and each month thereafter and by the terms of the Mortgage, upon default in such payments for a period of one month or more, the entire principal balance and all interest due and other charges are due and collectible.

6. The following amounts are due to Plaintiff on the Mortgage:

Principal Balance	\$32,702.39
Interest from 06/16/2007 through 10/31/2007 at 8.5600%.....	\$1,065.86
Per Diem interest rate at \$7.78	
Reasonable Attorney's Fee at 5% of Principal Balance as more fully explained in the next numbered paragraph.....	\$1,635.12
Late Charges from 07/16/2007 to 10/31/2007	\$132.91
Monthly late charge amount at \$33.23	
Costs of suit and Title Search	\$900.00
Insurance	\$96.25
	\$36,532.53

7. If the Mortgage is reinstated prior to a Sheriff's Sale, the Attorney's Fees 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 is entitled to collect Attorney's fees of 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 Defendants in this Action but reserves its right to bring a separate Action to establish that right, if such right exists. If Defendants have received a discharge of their personal liability in a Bankruptcy proceeding, this Action of Mortgage Foreclosure is, in no way, an attempt to re-establish the personal liability that was discharged in Bankruptcy, but only to foreclose the Mortgage and sell the Property pursuant to Pennsylvania law.

9. Notice of Intention to Foreclose and a Notice of Homeowners' Emergency Mortgage Assistance has been sent to Defendants by certified and regular mail, as required by Act 160 of 1998 of the Commonwealth of Pennsylvania, on the date(s) set forth in the true and correct copy of such notice(s) attached hereto as Exhibit "B". The Defendants have not had the required face-to-face meeting within the required time and Plaintiff has no knowledge of any such meeting being requested by the Defendants through the Plaintiff, the Pennsylvania Housing Finance Agency, or any appropriate Consumer Credit Counseling Agency.

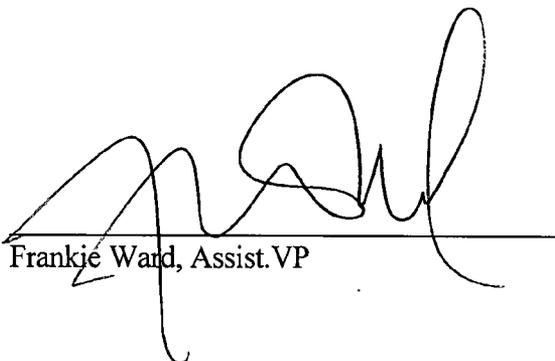
WHEREFORE, Plaintiff demands a de terris judgment in mortgage foreclosure in the sum of \$36,532.53, together with interest at the rate of \$7.78, per day and other expenses, costs and charges incurred by the Plaintiff which are properly chargeable in accordance with the terms of the Mortgage and Pennsylvania law until the Mortgage is paid in full, and for the foreclosure of the Mortgage and Sheriff's Sale of the Property.

By: 
GOLDBECK McCAFFERTY & McKEEVER
BY: JOSEPH A. GOLDBECK, JR., ESQUIRE
ATTORNEY FOR PLAINTIFF

VERIFICATION

I, Frankie Ward, as the representative of the Plaintiff corporation within named do hereby verify that I am authorized to and do make this verification on behalf of the Plaintiff corporation and the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: 10/30/07


Frankie Ward, Assist. VP

2000510259330 SHARON K. YOUNG and RICHARD L. YOUNG

Exhibit A

Finiti Settlement, LLC



TITLE SEARCH REPORT

Order # 6650107

EXHIBIT A

ALL THAT CERTAIN PARCEL OF LAND IN TOWNSHIP OF DECATUR ,
CLEARFIELD COUNTY, COMMONWEALTH OF PA, AS MORE FULLY
DESCRIBED IN INSTRUMENT NO 200300182 ID# 112-P12-175, 112-P12-
208, BEING KNOWN AND DESIGNATED AS A METES AND BOUNDS
PROPERTY .

BEING THE SAME FEE SIMPLE PROPERTY CONVEYED BY DEED FROM
GLORIA J. FERGUSON MC CLOSKEY TO RICHARD L. YOUNG and
SHARON K. YOUNG HUSBAND AND WIFE TENANCY BY ENTIRETY,
DATED 04/11/1997 RECORDED ON 01/07/2003 IN INSTRUMENT NO
200300182. IN CLEARFIELD COUNTY RECORDS, COMMONWEALTH OF
PA.

Exhibit B

REPRESENTATION OF PRINTED DOCUMENT
7107 8381 6540 0508 5280

31886 000007
SHARON K YOUNG
RICHARD YOUNG
846 CLOVER ST
PHILIPSBURG PA 16866

RE: CitiFinancial Loan#: 38-0082-0204727
Property Address: 846 CLOVER ST
PHILIPSBURG PA 16866

ACT 91 NOTICE
DATE OF NOTICE: September 16, 2007

**TAKE ACTION TO SAVE YOUR HOME FROM
FORECLOSURE**

This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869.)

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact any attorney in your area. The local bar association may be able to help you find a lawyer.

La notificación en adjunto es de suma importancia, pues afecta su derecho a continuar viviendo en su casa. Si no comprende el contenido de esta notificación obtenga una traducción inmediatamente llamando a esta agencia (Pennsylvania Housing Finance Agency) sin cargos al número mencionada arriba. Puedes ser elegible para un préstamo por el programa llamado "Homeowner's Emergency Mortgage Assistance Program" el cual puede salvar su casa de la pérdida del derecho a redimir su hipoteca.

Prepared by: CITIFINANCIAL SERVICES, INC.
RD 4 BOX 35 B
TYRONE PA 16866

REPRESENTATION OF PRINTED DOCUMENTDate: **September 16, 2007**

Homeowners Name: **SHARON K YOUNG
RICHARD YOUNG**
 Property Address: **846 CLOVER ST
PHILIPSBURG PA 16866**
 Loan Account No.: **38-0082-0204727**
 Lender/Service: **CITIFINANCIAL SERVICES, INC.**

**HOMEOWNERS'
EMERGENCY MORTGAGE ASSISTANCE PROGRAM**

**YOU MAY BE ELIGIBLE FOR FINANCIAL
ASSISTANCE WHICH CAN SAVE YOUR HOME FROM
FORECLOSURE AND HELP YOU MAKE FUTURE
MORTGAGE PAYMENTS**

IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:

*** IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,**

*** IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND**

*** IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.**

TEMPORARY STAY OF FORECLOSURE - Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a "face-to-face" meeting with one of the designated consumer credit counseling agencies listed at the end of this Notice.

THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT", EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.

CONSUMER CREDIT COUNSELING AGENCIES - If you meet with one of the consumer credit counseling agencies listed at the end of this notice, the lender may **NOT** take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face-to-face meeting. Advise your lender immediately of your intentions.

APPLICATION FOR MORTGAGE ASSISTANCE - Your mortgage is in default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a

REPRESENTATION OF PRINTED DOCUMENT

complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your fact-to-face meeting.

YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.

AGENCY ACTION - Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT.

(If you have filed bankruptcy you can still apply for
Emergency Mortgage Assistance.)

HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).

NATURE OF THE DEFAULT - The Mortgage debt held by the above lender on your property located at: 846 CLOVER ST, PHILIPSBURG PA 16866 IS SERIOUSLY IN DEFAULT because:

A. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following months and the following amounts are now past due:

- (a) Monthly payments (including late charges) from 07/16/07 through present.
- (b) Other charges; Escrow, Inspections, NSF Check
- (c) TOTAL AMOUNT OF (a) and (b) REQUIRED AS OF THIS DATE \$759.96

HOW TO CURE THE DEFAULT - You may cure the default within **THIRTY (30) DAYS** of the date of this notice **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER WHICH IS \$759.96 PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD.** Payments must be made either by cash, cashier's check, certified check or money order made payable and send to

CITIFINANCIAL SERVICES, INC., RD 4 BOX 35 B, TYRONE PA 16686

IF YOU DO NOT CURE THE DEFAULT - If you do not cure the default within **THIRTY (30) DAYS** of the date of this Notice, the lender intends to exercise its rights to accelerate the mortgage debt. This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within **THIRTY (30) DAYS**, the lender also intends to instruct its attorneys to start legal action to foreclose upon your mortgaged property.

IF THE MORTGAGE IS FORECLOSED UPON - The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender brings legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against

REPRESENTATION OF PRINTED DOCUMENT

you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. **If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.**

OTHER LENDER REMEDIES - The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE - If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the total amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. **Curing your default in the manner set forth in this notice will restore your mortgage to the same position as if you had never defaulted.**

EARLIEST POSSIBLE SHERIFF'S SALE DATE - It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be **approximately four (4) to six (6) months from the date of this Notice.** A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

HOW TO CONTACT THE LENDER:

Name of Lender: CITIFINANCIAL SERVICES, INC.

Address: RD 4 BOX 35 B
TYRONE PA 16686

Phone Number: 814-684-8401

Contact Person: BRANCH MANAGER

EFFECT OF SHERIFF'S SALE - You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishings and other belongings could be started by the lender at any time.

ASSUMPTION OF MORTGAGE - You may not sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

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YOU MAY ALSO HAVE THE RIGHT:

- * TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- * TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- * TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- * TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS.
- * TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- * TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

If you are represented by an Attorney, please refer this letter to such Attorney and provide us with such Attorney's name, address and telephone number.

To the extent your obligations have been discharged, or are subject to an automatic stay of bankruptcy order under Title 11 of the United States Code, this notice is for compliance and informational purposes only and does not constitute a demand for payment or any attempt to collect any such obligation.

REPRESENTATION OF PRINTED DOCUMENT

**PENNSYLVANIA HOUSING FINANCE AGENCY
HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM**

CONSUMER CREDIT COUNSELING AGENCIES

CENTRE COUNTY

CCCS OF WESTERN PENNSYLVANIA INC.
217 East Plank Road
Altoona, PA 16602
(814) 944-8100
FAX (814) 944-5747

CCCS OF NORTHEASTERN PA
1631 South Atherton Street, Suite 100
State College, PA 16801
(814) 238-2668
FAX (814) 238-3669

LYCOMING-CLINTON CO COMM FOR COMMUNITY
ACTION (STEP)
2138 Lincoln Street
P.O. Box 1328
Williamsport, PA 17703
(570) 326-0587
FAX (717) 322-2197

UA

IN THE COURT OF COMMON PLEAS
OF Clearfield COUNTY

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG and RICHARD L. YOUNG
Mortgagor(s) and Record Owner(s)

846 Clover Street
Philipsburg, PA 16866

Defendant(s)

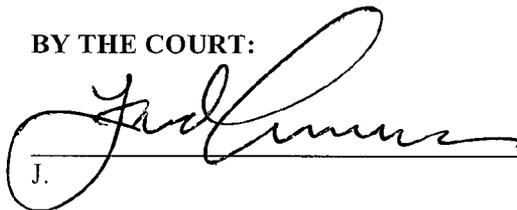
Term, No. 07-1761-CD

ORDER

And now, on this 2 day of Jan, ²⁰⁰⁸~~2007~~, upon consideration of the Motion to Compel Sheriff to Process Return of Service of plaintiff, CITIFINANCIAL SERVICES, INC. ("Plaintiff"), and any response thereto, it is hereby

ORDERED and DECREED that the Sheriff of Clearfield County shall (i) file the return of service with the Prothonotary, and (ii) send a copy of the return of service to Plaintiff's counsel within five (5) days of the date of this Order.

BY THE COURT:


J.

FILED
014:00301
JAN 02 2008

icc
Atty Fein

William A. Shaw
Prothonotary/Clerk of Courts

icc Sheriff
(without memo)
(SK)

DATE: 12/108

You are responsible for serving all appropriate parties.

____ The Prothonotary's office has provided service to the following parties:

____ Plaintiff(s) ____ Plaintiff(s) Attorney ____ Other

____ Defendant(s) ____ Defendant(s) Attorney

____ Special Instructions:

FILED

JAN 02 2008

William A. Shaw
Prothonotary/Clerk of Courts

UA

GOLDBECK McCAFFERTY & McKEEVER

BY: DAVID FEIN, ESQUIRE

Attorney I.D. #82628

Suite 5000 – Mellon Independence Center

701 Market Street

Philadelphia, PA 19106

215-627-1322

ATTORNEY FOR PLAINTIFF

FILED ICC
m/11:03/07
DEC 28 2007
Atty Fein
GK

William A. Shaw
Prothonotary/Clerk of Courts

CITIFINANCIAL SERVICES, INC.

1111 Northpoint Drive

Building 4, Suite 100

Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG and RICHARD L. YOUNG

Mortgagor(s) and Record Owner(s)

846 Clover Street

Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

Term, No. 07-1761-CD

MOTION TO COMPEL SHERIFF TO PROCESS RETURN OF SERVICE

Plaintiff, CITIFINANCIAL SERVICES, INC. (“Plaintiff”), by and through its attorneys, Goldbeck McCafferty & McKeever, moves this Honorable Court for an Order to Compel the Sheriff of Clearfield County to process the return of service:

1. On October 31, 2007 Plaintiff filed its Complaint in Mortgage Foreclosure.
2. On that same day, Plaintiff requested that the Sheriff of Clearfield County serve the complaint upon defendants, SHARON K. YOUNG and RICHARD L. YOUNG (“Defendants”)
3. The Sheriff served the complaint upon the defendants November 2, 2007 per a phone call to Marilyn at the Sheriff’s Office.
4. Pursuant to Pa. R.C.P. No. 405(a), after service is attempted, the Sheriff shall make a return of service or a return of no service forthwith. (emphasis added).

5. Pursuant to Rule 405(e), the return of service or of no service shall be filed with the Prothonotary and mailed to the person requesting service to be made.

6. It has been two (2) months, yet the Sheriff has neither filed the return of service with the Prothonotary, nor mailed the return of service to Plaintiff.

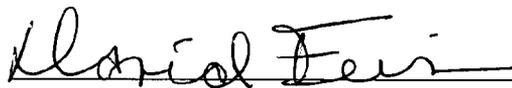
7. The Sheriff is not in compliance with Rule 405.

8. The Sheriff's delay has caused prejudice to Plaintiff, as Plaintiff has been unable to continue with this lawsuit.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an Order compelling the Sheriff to process the return of service.

Respectfully submitted,

GOLDBECK McCAFFERTY & McKEEVER



David Fein, Esquire
Attorney for Plaintiff

GOLDBECK McCAFFERTY & McKEEVER

BY: DAVID FEIN, ESQUIRE

Attorney I.D. #82628

Suite 5000 – Mellon Independence Center

701 Market Street

Philadelphia, PA 19106

215-627-1322

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL SERVICES, INC.

1111 Northpoint Drive

Building 4, Suite 100

Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG and RICHARD L. YOUNG

Mortgagor(s) and Record Owner(s)

846 Clover Street

Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

Term, No. 07-1761-CD

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF ITS
MOTION TO COMPEL SHERIFF TO PROCESS RETURN OF SERVICE**

I. FACTS

On October 31, 2007, Plaintiff filed its Complaint in Mortgage Foreclosure. On that same day, Plaintiff requested that the Sheriff of Clearfield County serve the complaint upon Defendants. The Sheriff served the complaint upon the defendants on November 2, 2007.

II. ARGUMENT

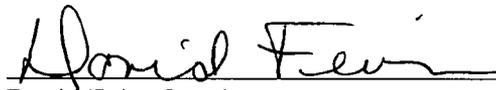
Pursuant to Pa. R.C.P. No. 405(a), after service is attempted, the Sheriff shall make a return of service or a return of no service forthwith. (emphasis added). Pursuant to Rule 405(e), the return of service or of no service shall be filed with the Prothonotary and mailed to the person requesting service to be made. It has been two (2) months, yet the Sheriff has neither filed the return of service with the Prothonotary, nor mailed the return of service to Plaintiff. The Sheriff is not in compliance with Rule 405.

III. CONCLUSION

The Sheriff's delay has caused prejudice to Plaintiff, as Plaintiff has been unable to continue with this lawsuit. Plaintiff therefore requests that this Honorable Court enter an Order compelling the Sheriff to process the return of service.

Respectfully submitted,

GOLDBECK McCAFFERTY & McKEEVER

A handwritten signature in cursive script that reads "David Fein". The signature is written in black ink and is positioned above a horizontal line.

David Fein, Esquire
Attorney for Plaintiff

VERIFICATION

David Fein, Esquire, hereby states that he is the attorney for Plaintiff herein, and that all of the facts set forth within the attached Motion are true and correct to the best of his knowledge, information and belief. The undersigned understands that the foregoing statements are made subject to the penalties of 18 P.S. Section 4904.

GOLDBECK McCAFFERTY & McKEEVER

By: David Fein
David Fein, Esquire
Attorney for Plaintiff

GOLDBECK McCAFFERTY & McKEEVER

BY: DAVID FEIN, ESQUIRE

Attorney I.D. #82628

Suite 5000 – Mellon Independence Center

701 Market Street

Philadelphia, PA 19106

215-627-1322

ATTORNEY FOR PLAINTIFF

CITIFINANCIAL SERVICES, INC.

1111 Northpoint Drive

Building 4, Suite 100

Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG and RICHARD L. YOUNG

Mortgagor(s) and Record Owner(s)

846 Clover Street

Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

TERM, No. 07-1761-CD

CERTIFICATE OF SERVICE

David Fein, Esquire, hereby certifies that on December 27, 2007 he did serve true and correct copies of the within Motion by first class mail, postage pre-paid upon the following:

SHARON K. YOUNG

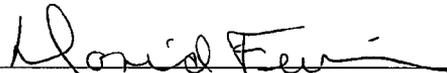
846 Clover Street

Philipsburg, PA 16866

RICHARD L. YOUNG

846 Clover Street

Philipsburg, PA 16866


David Fein, Esquire
Attorney for Plaintiff

Date: December 27, 2007

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103376
NO: 07-1761-CD
SERVICE # 1 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIFINANCIAL SERVICES, INC.
vs.
DEFENDANT: SHARON K. YOUNG and RICHARD L. YOUNG

SHERIFF RETURN

NOW, November 02, 2007 AT 9:48 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON SHARON K. YOUNG DEFENDANT AT (RESIDENCE) 846 CLOVER ST., PHILIPSBURG, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO SHARON K. YOUNG, DEFENDANT A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

FILED

0/9:00 LM
JAN 07 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103376
NO: 07-1761-CD
SERVICE # 2 OF 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIFINANCIAL SERVICES, INC.
vs.
DEFENDANT: SHARON K. YOUNG and RICHARD L. YOUNG

SHERIFF RETURN

NOW, November 02, 2007 AT 9:48 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON RICHARD L. YOUNG DEFENDANT AT (RESIDENCE) 846 CLOVER ST., PHILIPSBURG, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO SHARON YOUNG, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

SERVED BY: HUNTER / DEHAVEN

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103376
NO: 07-1761-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIFINANCIAL SERVICES, INC.
vs.
DEFENDANT: SHARON K. YOUNG and RICHARD L. YOUNG

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	314622	20.00
SHERIFF HAWKINS	GOLDBECK	314622	39.52

Sworn to Before Me This

_____ Day of _____ 2007

So Answers,



Chester A. Hawkins
Sheriff

In the Court of Common Pleas of Clearfield County

FILED

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
(Mortgagor(s) and Record Owner(s))
846 Clover Street
Philipsburg, PA 16866

Defendant(s)

JAN 09 2008
m/12:05/um
William A. Shaw
Prothonotary/Clerk of Courts
NOTICE TO
DEBTOR

No. 07-1761-CD

PRAECIPE FOR JUDGMENT

THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.

Enter the Judgment in favor of Plaintiff and against SHARON K. YOUNG and RICHARD L. YOUNG by default for want of an Answer.

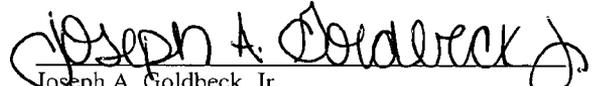
Assess damages as follows:

Debt	\$36,987.99
Interest from 12/20/2007 to Date of Sale	_____
Total	_____

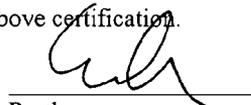
(Assessment of Damages attached)

I CERTIFY THAT FOREGOING ASSESSMENT OF DAMAGES IS FOR SPECIFIED AMOUNTS ALLEGED TO BE DUE IN THE COMPLAINT AND IS CALCULABLE AS A SUM CERTAIN FROM THE COMPLAINT.

I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment is to be entered and to his attorney of record, if any, after the default occurred and at least ten days prior to the date of the filing of this praecipe. A copy of the notice is attached. R.C.P. 237.1


Joseph A. Goldbeck, Jr.
Attorney for Plaintiff
I.D. #16132

AND NOW January 9, 2008, Judgment is entered in favor of CITIFINANCIAL SERVICES, INC. and against SHARON K. YOUNG and RICHARD L. YOUNG by default for want of an Answer and damages assessed in the sum of \$36,987.99 as per the above certification.


Prothonotary

IN THE COURT OF COMMON PLEAS
OF Clearfield COUNTY, PENNSYLVANIA
CIVIL ACTION - LAW

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

No. 07-1761-CD

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
(Mortgagors and Record Owner(s))
846 Clover Street
Philipsburg, PA 16866

Defendant(s)

THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.

NOTICE

Notice is given that a judgment in the above-captioned matter has been entered against you.

William Shaw
Prothonotary

By: 

~~Deputy~~

If you have any questions concerning the above, please contact:

Joseph A. Goldbeck, Jr.
Goldbeck McCafferty & McKeever
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-627-1322

THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.

DATE OF THIS NOTICE: **November 26, 2007**

TO:

SHARON K. YOUNG
846 Clover Street
Philipsburg, PA 16866

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
(Mortgagor(s) and Record Owner(s))
846 Clover Street
Philipsburg, PA 16866

Defendant(s)

In the Court of
Common Pleas
of Clearfield County

CIVIL ACTION - LAW

Action of
Mortgage Foreclosure

Term
No. 07-1761-CD

TO:

SHARON K. YOUNG
846 Clover Street
Philipsburg, PA 16866

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 (10) 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.

KEYSTONE LEGAL SERVICES
211 1/2 E. Locust Street
Clearfield, PA 16830
814-765-9646

PENNSYLVANIA BAR ASSOCIATION
P.O. Box 186
Harrisburg, PA 17108
800-692-7375

Joseph A. Goldbeck, Jr

GOLDBECK McCAFFERTY & McKEEVER

BY: Joseph A. Goldbeck, Jr., Esq.

Attorney for Plaintiff

Suite 5000 – 701 Market Street.

Philadelphia, PA 19106 215-825-6318

THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.

DATE OF THIS NOTICE: **November 26, 2007**

TO:

RICHARD L. YOUNG
846 Clover Street
Philipsburg, PA 16866

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
(Mortgagor(s) and Record Owner(s))
846 Clover Street
Philipsburg, PA 16866

Defendant(s)

In the Court of
Common Pleas
of Clearfield County

CIVIL ACTION - LAW

Action of
Mortgage Foreclosure

Term
No. 07-1761-CD

TO:

RICHARD L. YOUNG
846 Clover Street
Philipsburg, PA 16866

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 (10) 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.

KEYSTONE LEGAL SERVICES
211 1/2 E. Locust Street
Clearfield, PA 16830
814-765-9646

PENNSYLVANIA BAR ASSOCIATION
P.O. Box 186
Harrisburg, PA 17108
800-692-7375

Joseph A. Goldbeck, Jr

GOLDBECK McCAFFERTY & McKEEVER

BY: Joseph A. Goldbeck, Jr., Esq.

Attorney for Plaintiff

Suite 5000 – 701 Market Street.

Philadelphia, PA 19106 215-825-6318

VERIFICATION OF NON-MILITARY SERVICE

The undersigned, as the representative for the Plaintiff corporation within named do hereby verify that I am authorized to make this verification on behalf of the Plaintiff corporation and that the facts set forth in the foregoing verification of Non-Military Service are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

1. That the above named Defendant, SHARON K. YOUNG, is about unknown years of age, that Defendant's last known residence is 846 Clover Street, Philipsburg, PA 16866, and is engaged in the unknown business located at unknown address.

2. That Defendant is 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 Action of Congress of 1940 and its Amendments.

Date:

12/19/07

Joseph A. DeLawarek Jr.

VERIFICATION OF NON-MILITARY SERVICE

The undersigned, as the representative for the Plaintiff corporation within named do hereby verify that I am authorized to make this verification on behalf of the Plaintiff corporation and that the facts set forth in the foregoing verification of Non-Military Service are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

1. That the above named Defendant, RICHARD L. YOUNG, is about unknown years of age, that Defendant's last known residence is 846 Clover Street, Philipsburg, PA 16866, and is engaged in the unknown business located at unknown address.

2. That Defendant is 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 Action of Congress of 1940 and its Amendments.

Date:

12/19/07

Joseph A. Bolden

GOLDBECK McCAFFERTY & McKEEVER
BY: Joseph A. Goldbeck, Jr.
Attorney I.D. #16132
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-627-1322
Attorney for Plaintiff

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
(Mortgagor(s) and Record owner(s))
846 Clover Street
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

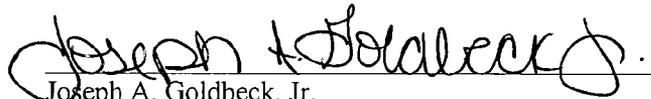
CIVIL ACTION LAW

ACTION OF MORTGAGE FORECLOSURE

No. 07-1761-CD

ORDER FOR JUDGMENT

Please enter Judgment in favor of CITIFINANCIAL SERVICES, INC., and against SHARON K. YOUNG and RICHARD L. YOUNG for failure to file an Answer in the above action within (20) days (or sixty (60) days if defendant is the United States of America) from the date of service of the Complaint, in the sum of \$36,987.99.


Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

I hereby certify that the above names are correct and that the precise residence address of the judgment creditor is CITIFINANCIAL SERVICES, INC. 1111 Northpoint Drive Building 4, Suite 100 Coppell, TX 75019 and that the name(s) and last known address(es) of the Defendant(s) is/are SHARON K. YOUNG, 846 Clover Street Philipsburg, PA 16866 and RICHARD L. YOUNG, 846 Clover Street Philipsburg, PA 16866;


GOLDBECK McCAFFERTY & McKEEVER
BY: Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

ASSESSMENT OF DAMAGES

TO THE PROTHONOTARY:

Kindly assess the damages in this case to be as follows:

Principal Balance	\$32,702.39
Interest from 06/16/2007 through 12/19/2007	\$1,454.86
Reasonable Attorney's Fee	\$1,635.12
Late Charges	\$199.37
Costs of Suit and Title Search	\$900.00
Escrow Payments Due 0 X \$0.00	\$0.00
Insurance	\$96.25
	<hr/>
	\$36,987.99


GOLDBECK McCAFFERTY & McKEEVER
BY: Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

AND NOW, this 9th day of JAN, 2008 damages are assessed as above.



Pro Prothy

Goldbeck McCafferty & McKeever
BY: Joseph A. Goldbeck, Jr.
Attorney I.D. #16132
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-627-1322
Attorney for Plaintiff

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
(Mortgagor(s) and Record Owner(s))
846 Clover Street
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 07-1761-CD

AFFIDAVIT PURSUANT TO RULE 3129

CITIFINANCIAL SERVICES, INC., Plaintiff in the above action, by its attorney, Joseph A. Goldbeck, Jr., Esquire, sets forth as of the date the praecipe for the writ of execution was filed the following information concerning the real property located at:

846 Clover Street
Philipsburg, PA 16866

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

SHARON K. YOUNG
846 Clover Street
Philipsburg, PA 16866

RICHARD L. YOUNG
846 Clover Street
Philipsburg, PA 16866

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

SHARON K. YOUNG
846 Clover Street
Philipsburg, PA 16866

RICHARD L. YOUNG
846 Clover Street
Philipsburg, PA 16866

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

DOMESTIC RELATIONS OF CLEARFIELD COUNTY
230 E. Market Street

Clearfield, PA 16830

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement
Health and Welfare Bldg. - Room 432
Harrisburg, PA 17105-2675

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

CITIFINANCIAL MORTGAGE CO. INC.
1111 Northpoint Drive
Building 4 Suite 100
Coppell, TX 75019

ASSOCIATES FINANCIAL SERVICES CO. INC.
1111 Northpoint Drive, Bldg 4, Ste. 100
Coppell, TX 75019-3931

CITIFINANCIAL, INC.
RD 4, Box 35B
Tyrone, PA 16686

5. Name and address of every other person who has any record interest in or record lien on the property and whose interest may be affected by the sale:

6. Name and address of every other person of whom the plaintiff has knowledge who has any record interest in the property which may be affected by the sale.

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

TENANTS/OCCUPANTS
846 Clover Street
Philipsburg, PA 16866

(attach separate sheet if more space is needed)

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

DATED: December 19, 2007


GOLDBECK McCAFFERTY & McKEEVER
BY: Joseph A. Goldbeck, Jr., Esq.
Attorney for Plaintiff

Joseph A. Goldbeck, Jr.
Attorney I.D. #16132
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-627-1322
Attorney for Plaintiff

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
Mortgagor(s) and Record Owner(s)
846 Clover Street
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF
COMMON PLEAS

of Clearfield County

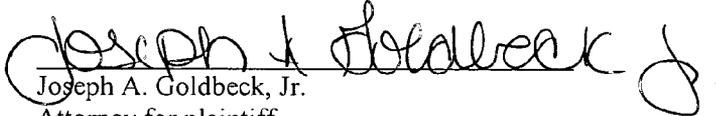
CIVIL ACTION - LAW

ACTION OF
MORTGAGE FORECLOSURE

NO. 07-1761-CD

CERTIFICATION AS TO THE SALE OF REAL PROPERTY

I, Joseph A. Goldbeck, Jr., Esquire hereby certify that I am the attorney of record for the Plaintiff in this action, and I further certify that this property is subject to Act 91 of 1983 and the Plaintiff has complied with all the provisions of the Act.


Joseph A. Goldbeck, Jr.
Attorney for plaintiff

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

FILED

JAN 09 2008

W (12:30/W)
William A. Shaw
Prothonotary/Clerk of Courts
I came w/6 writs
to SHL

Joseph A. Goldbeck, Jr.
Attorney I.D.#16132
Suite 5000 - Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-627-1322
Attorney for Plaintiff

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
Mortgagor(s) and Record Owner(s)
846 Clover Street
Philipsburg, PA 16866

Defendant(s)

copy to SHL

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 07-1761-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Issue Writ of Execution in the above matter:

Amount Due

\$36,987.99

Interest from
12/20/2007 to Date of
Sale at 8.5600%

(Costs to be added)

PROTHONOTARY COSTS \$125.00

Joseph A. Goldbeck, Jr.
GOLDBECK McCAFFERTY & McKEEVER

BY: Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

Term
No. 07-1761-CD
IN THE COURT OF COMMON PLEAS

CITIFINANCIAL SERVICES, INC.

vs.

SHARON K. YOUNG and
RICHARD L. YOUNG
(Mortgagor(s) and Record Owner(s))
846 Clover Street
Philipsburg, PA 16866

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

Goldbeck McCafferty & McKeever
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-627-1322

ALL THAT CERTAIN PARCEL OF LAND IN TOWNSHIP OF DECATUR CLEARFIELD COUNTY, COMMONWEALTH OF PA, AS MORE FULLY DESCRIBED IN INSTRUMENT NO 200300182 ID# 112-P12-175-P12-208, BEING KNOWN AND DESIGNATED AS A METES AND BOUNDS PROPERTY.

ALSO BEING DESCRIBED AS:

ALL THOSE FOUR (4) CERTAIN PIECES OR LOTS OF LAND SITAUTE IN THE TOWNSHIP OF DECATUR, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

PURPART NO. 1: BEGINNING AT A POST CORNER ON THE NORTHERN SIDE OF FOREST STREET, WHICH POST IS SIX HUNDRED AND FORTY THREE AND 6/10 FEET FPR, THE DIVISION LINE OF LAND OF THE PHILIPSBURG COAL AND LAND COMPANY AND MRS. HENREITTA FOSTER, MEASURED ALONG THE NORTHERN SIDE OF FOREST STREET; THENCE, ALONG NORTHERN SIDE OF SAID FOREST STREET NORTH 56" 17' WEST, TWO HUNDRED SIX (206) FEET TO A POST; THENCE NORTH 37" EAST, FOUR HUNDRED (400) FEET TO A POST; THENCE ALONG LAND OF THE PHILIPSBURG COAL AND LAND COMPANY, SOUTH 56" 17' EAST, TWO HUNDRED SIX (206) FEET TO A POST; THENCE SOUTH 37" WEST, FOUR HUNDRED (400) FEET TO POST AND PLACE OF BEGINNING, COTAINING ONE AND 89/100 ACRES.

PURPART NO. 2: BEGINNING AT A POST CORNER IN THE SWAMP, THE SAID POST BEING THEN ORTHWESTERN CORNER OF LAND PREVIOUSLY SOLD TO DAVID TURNBULL AND THE NORTHEASTERN CORNER OF LAND PREVIOUSLY SOLD TO MICHAEL HAMECH; THENCE BY THE SAID LAND OF MICHAEL HAMECH NORTH 56" 17' WEST, TWO HUNDRED SIX (206) FEET TO A POST; THENCE BY OTHER LANDS OF THE PHILIPSBURG COAL AND LAND COMPANY NORTH 37" EAST, TWO HUNDRED ELEVEN AND FOUR TENTHS (211.4) FEET TO A POST; THENCE STILL BY LANDS OF THE SAME SOUTH 56" 17' EAST, TWO HUNDRED SIX (206) FEET TO A POST; THENCE STILL BY LANDS OF THE SAME SOUTH 37" WEST, TWO HUNDRED ELEVEN AND FOUR TENTHS (211.4) FEET TO A POST AND THE PLACE OF BEGINNING, CONTAINING 1 ACRE NEAT.

PURPANT NO. 3: BEGINNING AT A POST CORNER ON THE LINE OF LANDS OF MIKE COMITZ AND WHICH POST IS THE NORTHEASTERN CORNER OF LANDS OWNED BY DAVID TURNBULL ON THE MIKE COMITZ LINE; THENCE BY LAND OF MIKE COMITZ NORTH 36" 43' EAST TWO HUNDRED ELEVEN AND FOUR TENTHS (211.4) FEET TO A POST CORNER ON LAND OF THE PHILIPSBURG COAL AND LAND COMPANY SOUTH 56" 17' EAST TWO HUNDRED SIX (206) FEET TO A POST; THENCE BY THE SAME SOUTH 36" 43' WEST TWO HUNDRED ELVEN AND FOUR TENTHS (211.4) FEET TO A POST CORNER ON THE LINE OF LANDS OF DAVID TURNBULL; THENCE ALONG

SAID LAND OF DAVID TURNBULL NORTH 56" 17' WEST, TWO HUNDRED SIX (206) FEET TO A POST AND PLACE OF BEGINNING, CONTAINING ONE ACRE.

PURPART NO. 4: BEGINNING AT A POST CORNER ON THE EASTERN LINE OF LANDS OF PETER PRUSNACK, AND WHICH POST IS THE NORTHWESTERN CORNER OF LANDS FORMERLY SOLD BY THE PHILIPSBURG COAL AND LAND COMPANY TO MIKE COMITZ; THENCE ALONG SAID LANDS OF THE PETER PRUSNACK, NORTH 37" 00' EAST, A DISTANCE OF EIGHTY-FIVE AND SIX TENTHS (85.6) FEET TO A POST ON THE SOUTHWESTERN SIDE OF A ROAD; THENCE ALONG THE SOUTHWESTERN SIDE OF SAID ROAD SOUTH 56" 16' EAST, A DISTANCE OF 412 FEET TO A POST ON THE WESTERN SIDE OF SAID LANE SOUTH 37" 00' WEST, A DISTANCE OF SEVENTY-FIVE AND SEVEN TENTHS (75.7) FEET TO A POST, CORNER OF LANDS OF MIKE COMITZ; THENCE BY SAID LANDS OF MIKE COMITZ NORTH 56" 17' WEST, A DISTANCE OF FOUR HUNDRED TWELVE (412) FEET AND THE PLACE OF BEGINNING. CONTAINING 736/1000 OF AN ACRE.

TAX PARCEL #: 112-P12-000-175 & 112-11P12-000-208

PROPERTY ADDRESS: 846 CLOVER STREET, PHILIPSBURG, PA 16866

Term
No. 07-1761-CD

IN THE COURT OF COMMON PLEAS
CITIFINANCIAL SERVICES, INC.

vs.

SHARON K. YOUNG and
RICHARD L. YOUNG
Mortgagor(s)
846 Clover Street Philipsburg, PA 16866

REAL DEBT	
INTEREST from	
COSTS PAID:	
PROTHY	\$36,987.99
SHERIFF	\$
STATUTORY	\$
COSTS DUE PROTHY	\$
Office of Judicial Support	
Judg. Fee	
Cr.	
Sat.	

Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

Goldbeck, McCafferty & McKeever
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
(215) 627-1322

ALL THAT CERTAIN PARCEL OF LAND IN TOWNSHIP OF DECATUR CLEARFIELD COUNTY, COMMONWEALTH OF PA, AS MORE FULLY DESCRIBED IN INSTRUMENT NO 200300182 ID# 112-P12-175-P12-208, BEING KNOWN AND DESIGNATED AS A METES AND BOUNDS PROPERTY.

ALSO BEING DESCRIBED AS:

ALL THOSE FOUR (4) CERTAIN PIECES OR LOTS OF LAND SITAUTE IN THE TOWNSHIP OF DECATUR, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

PURPART NO. 1: BEGINNING AT A POST CORNER ON THE NORTHERN SIDE OF FOREST STREET, WHICH POST IS SIX HUNDRED AND FORTY THREE AND 6/10 FEET FPR, THE DIVISION LINE OF LAND OF THE PHILIPSBURG COAL AND LAND COMPANY AND MRS. HENREITTA FOSTER, MEASURED ALONG THE NORTHERN SIDE OF FOREST STREET; THENCE, ALONG NORTHERN SIDE OF SAID FOREST STREET NORTH 56" 17' WEST, TWO HUNDRED SIX (206) FEET TO A POST; THENCE NORTH 37" EAST, FOUR HUNDRED (400) FEET TO A POST; THENCE ALONG LAND OF THE PHILIPSBURG COAL AND LAND COMPANY, SOUTH 56" 17' EAST, TWO HUNDRED SIX (206) FEET TO A POST; THENCE SOUTH 37" WEST, FOUR HUNDRED (400) FEET TO POST AND PLACE OF BEGINNING, COTAINING ONE AND 89/100 ACRES.

PURPART NO. 2: BEGINNING AT A POST CORNER IN THE SWAMP, THE SAID POST BEING THEN ORTHWESTERN CORNER OF LAND PREVIOUSLY SOLD TO DAVID TURNBULL AND THE NORTHEASTERN CORNER OF LAND PREVIOUSLY SOLD TO MICHAEL HAMECH; THENCE BY THE SAID LAND OF MICHAEL HAMECH NORTH 56" 17' WEST, TWO HUNDRED SIX (206) FEET TO A POST; THENCE BY OTHER LANDS OF THE PHILIPSBURG COAL AND LAND COMPANY NORTH 37" EAST, TWO HUNDRED ELEVEN AND FOUR TENTHS (211.4) FEET TO A POST; THENCE STILL BY LANDS OF THE SAME SOUTH 56" 17' EAST, TWO HUNDRED SIX (206) FEET TO A POST; THENCE STILL BY LANDS OF THE SAME SOUTH 37" WEST, TWO HUNDRED ELEVEN AND FOUR TENTHS (211.4) FEET TO A POST AND THE PLACE OF BEGINNING, CONTAINING 1 ACRE NEAT.

PURPANT NO. 3: BEGINNING AT A POST CORNER ON THE LINE OF LANDS OF MIKE COMITZ AND WHICH POST IS THE NORTHEASTERN CORNER OF LANDS OWNED BY DAVID TURNBULL ON THE MIKE COMITZ LINE; THENCE BY LAND OF MIKE COMITZ NORTH 36" 43' EAST TWO HUNDRED ELEVEN AND FOUR TENTHS (211.4) FEET TO A POST CORNER ON LAND OF THE PHILIPSBURG COAL AND LAND COMPANY SOUTH 56" 17' EAST TWO HUNDRED SIX (206) FEET TO A POST; THENCE BY THE SAME SOUTH 36" 43' WEST TWO HUNDRED ELVEN AND FOUR TENTHS (211.4) FEET TO A POST CORNER ON THE LINE OF LANDS OF DAVID TURNBULL; THENCE ALONG

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TAX PARCEL #: 112-P12-000-175 & 112-11P12-000-208

PROPERTY ADDRESS: 846 CLOVER STREET, PHILIPSBURG, PA 16866

GOLDBECK McCAFFERTY & McKEEVER
BY: Michael T. McKeever
Attorney I.D.#56129
Suite 5000 - Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532
215-627-1322
Attorney for Plaintiff

FILED (P)
57853FC
CF: 10/31/2007
SD: 04/04/2008
\$36,987.99
MAR 12 2008
m/12:10/c
William L. Shaw
Prothonotary/Clerk of Courts

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
Mortgagor(s) and
Record Owner(s)

846 Clover Street
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term

No. 07-1761-CD

CERTIFICATE OF SERVICE
PURSUANT TO Pa.R.C.P. 3129.2 (c) (2)

Michael T. McKeever, Esquire, Attorney for Plaintiff, hereby certifies that service on the Defendants of the Notice of Sheriff Sale was made by:

- Per Cindy @ S.O. 1-25-08.
- Personal Service by the Sheriff's Office/competent adult (copy of return attached).
 - Certified mail by Michael T. McKeever (original green Postal return receipt attached).
 - Certified mail by Sheriff's Office.
 - Ordinary mail by Michael T. McKeever, Esquire to Attorney for Defendant(s) of record (proof of mailing attached).
 - Acknowledgment of Sheriff's Sale by Attorney for Defendant(s) (proof of acknowledgment attached).
 - Ordinary mail by Sheriff's Office to Attorney for Defendant(s) of record.

IF SERVICE WAS ACCOMPLISHED BY COURT ORDER.

- Premises was posted by Sheriff's Office/competent adult (copy of return attached).
- Certified Mail & ordinary mail by Sheriff's Office (copy of return attached).
- Certified Mail & ordinary mail by Michael T. McKeever (original receipt(s) for Certified Mail attached).

Pursuant to the Affidavit under Rule 3129 (copy attached), service on all lienholders (if any) has been made by ordinary mail by Michael T. McKeever, Esquire (copies of proofs of mailing attached).

The undersigned understands that the statements herein are subject to the penalties provided by 18 P.S. Section 4904.

Respectfully submitted,

Michael T. McKeever

BY: Michael T. McKeever
Attorney for Plaintiff

Name and Address of Sender
GOLDBECK
SUITE 5000
701 MARKET STREET
PHILADELPHIA, PA
19106-1532

Check type of mail or service:

- Certified
- COD
- Delivery Confirmation
- Express Mail
- Insured
- Recorded Delivery (International)
- Registered
- Return Receipt for Merchandise
- Signature Confirmation

Affix Stamp Here
 (If issued as a
 certificate of mailing,
 or for additional copies
 of this bill)
 Postmark and
 Date of Receipt

Article Number

Fee

Postage

SH Fee
 RD Fee
 RR Fee

1. DOMESTIC RELATIONS OF CLEARFIELD COUNTY
 230 E. Market Street
 Clearfield, PA 16830

2. PA DEPARTMENT OF PUBLIC WELFARE -
 Bureau of Child Support Enforcement
 Health and Welfare Bldg. - Room 432
 Harrisburg, PA 17105-2675

3. CITIFINANCIAL MORTGAGE CO. INC.
 1111 Northpoint Drive
 Building 4 Suite 100
 Geppell, TX 76049

4. ASSOCIATES FINANCIAL SERVICES CO. INC.
 1111 Northpoint Drive, Bldg 4, Ste. 100
 Coppell, TX 75019-3931

5. CITIFINANCIAL, INC.
 RD 4, Box 35B
 Tyrone, PA 16686

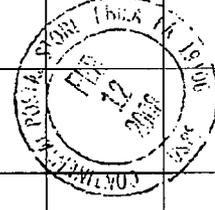
6. TENANTS/OCCUPANTS
 846 Clover Street
 Phillipsburg, PA 16866

Total Number of Pieces Listed by Sender

Postmaster, Per (Name of receiving employee)

Total Number of Pieces Received at Post Office

See Privacy Act Statement on Reverse



PS Form 3877, February 2002 (Page 1 of 2)

Complete by Typewriter, Ink, or Ball Point Pen

57853FC Clearfield County Sale Date:

SHARON K. YOUNG & RICHARD L. YOUNG

GOLDBECK McCAFFERTY & McKEEVER

BY: Michael T. McKeever
Attorney I.D.#56129
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
215-825-6320
Attorney for Plaintiff

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

Plaintiff

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
Mortgagor(s) and Record Owner(s)

846 Clover Street
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term
No. 07-1761-CD

AFFIDAVIT PURSUANT TO RULE 3129

CITIFINANCIAL SERVICES, INC., Plaintiff in the above action, by its attorney, Michael T. McKeever, Esquire, sets forth as of the date the praecipe for the writ of execution was filed the following information concerning the real property located at:

846 Clover Street
Philipsburg, PA 16866

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

SHARON K. YOUNG
846 Clover Street
Philipsburg, PA 16866

RICHARD L. YOUNG
846 Clover Street
Philipsburg, PA 16866

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

SHARON K. YOUNG
846 Clover Street
Philipsburg, PA 16866

RICHARD L. YOUNG
846 Clover Street
Philipsburg, PA 16866

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

DOMESTIC RELATIONS OF CLEARFIELD COUNTY
230 E. Market Street
Clearfield, PA 16830

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement
Health and Welfare Bldg. - Room 432
Harrisburg, PA 17105-2675

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

CITIFINANCIAL, INC.
RD 4, Box 35B
Tyrone, PA 16686

CITIFINANCIAL MORTGAGE CO. INC.
1111 Northpoint Drive
Building 4 Suite 100
Coppell, TX 75019

ASSOCIATES FINANCIAL SERVICES CO. INC.
1111 Northpoint Drive, Bldg 4, Ste. 100
Coppell, TX 75019-3931

5. Name and address of every other person who has any record interest in or record lien on the property and whose interest may be affected by the sale:

6. Name and address of every other person of whom the plaintiff has knowledge who has any record interest in the property which may be affected by the sale.

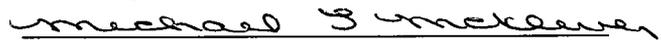
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale.

TENANTS/OCCUPANTS
846 Clover Street
Philipsburg, PA 16866

(attach separate sheet if more space is needed)

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

DATED: March 8, 2008


GOLDBECK McCAFFERTY & McKEEVER
BY: Michael T. McKeever, Esq.
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20712
NO: 07-1761-CD

PLAINTIFF: CITIFINANCIAL SERVICES, INC.
vs.
DEFENDANT: SHARON K. YOUNG AND RICHARD L. YOUNG
Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 1/9/2008
LEVY TAKEN 1/25/2008 @ 10:52 AM
POSTED 1/25/2008 @ 10:52 AM
SALE HELD 4/4/2008
SOLD TO CITIFINANCIAL SERVICES, INC.
SOLD FOR AMOUNT \$25,000.00 PLUS COSTS
WRIT RETURNED 5/6/2008
DATE DEED FILED 5/6/2008
PROPERTY ADDRESS 846 CLOVER STREET PHILIPSBURG , PA 16866

FILED
11:49 AM
MAY 06 2008
William A. Shaw
Prothonotary/Clerk of Courts

SERVICES

1/25/2008 @ 10:54 AM SERVED SHARON K. YOUNG

SERVED SHARON K. YOUNG, DEFENDANT AT HER RESIDENCE 846 CLOVER STREET, PHILIPSBURG, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO SHARON K. YOUNG

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

1/25/2008 @ 10:54 AM SERVED RICHARD L. YOUNG

SERVED RICHARD L. YOUNG, DEFENDANT, AT HIS RESIDENCE 846 CLOVER STREET, PHILIPSBURG, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO RICHARD L. YOUNG

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20712
NO: 07-1761-CD

PLAINTIFF: CITIFINANCIAL SERVICES, INC.
vs.
DEFENDANT: SHARON K. YOUNG AND RICHARD L. YOUNG
Execution REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS \$732.24
SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This
_____ Day of _____ 2008

So Answers,


Chester A. Hawkins
Sheriff

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

CITIFINANCIAL SERVICES, INC.
1111 Northpoint Drive
Building 4, Suite 100
Coppell, TX 75019

vs.

SHARON K. YOUNG
RICHARD L. YOUNG
846 Clover Street
Philipsburg, PA 16866

In the Court of Common Pleas of
Clearfield County

No. 07-1761-CD

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 described property:

PREMISES: 846 Clover Street Philipsburg, PA 16866

See Exhibit "A" attached

AMOUNT DUE \$36,987.99

Interest From 12/20/2007
Through Date of Sale _____

(Costs to be added)

PROTHONOTARY COSTS \$125.00

Dated: Jan. 9, 2008

[Signature]
Prothonotary, Common Pleas Court
of Clearfield County, Pennsylvania

Deputy _____

Received this writ this 9th day
of January A.D. 2008
At 3.00 A.M./P.M.

Cynthia A. Hunkler
Sheriff [Signature]

Term
No. 07-1761-CD

IN THE COURT OF COMMON PLEAS
CITIFINANCIAL SERVICES, INC.

vs.

SHARON K. YOUNG and
RICHARD L. YOUNG
Mortgagor(s)
846 Clover Street Philipsburg, PA 16866

WRIT OF EXECUTION
(Mortgage Foreclosure)

REAL DEBT	\$
INTEREST from	\$36,987.99
COSTS PAID:	
PROTHY	\$
SHERIFF	\$
STATUTORY	\$
COSTS DUE PROTHY	\$

Office of Judicial Support
Judg. Fee
Cr.
Sat.

Joseph A. Goldbeck, Jr.
Attorney for Plaintiff

Goldbeck McCafferty & McKeever
Suite 5000 – Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
(215) 627-1322

ALL THAT CERTAIN PARCEL OF LAND IN TOWNSHIP OF DECATUR CLEARFIELD COUNTY, COMMONWEALTH OF PA, AS MORE FULLY DESCRIBED IN INSTRUMENT NO 200300182 ID# 112-P12-175-P12-208, BEING KNOWN AND DESIGNATED AS A METES AND BOUNDS PROPERTY.

ALSO BEING DESCRIBED AS:

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TAX PARCEL #: 112-P12-000-175 & 112-11P12-000-208

PROPERTY ADDRESS: 846 CLOVER STREET, PHILIPSBURG, PA 16866

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME SHARON K. YOUNG

NO. 07-1761-CD

NOW, May 06, 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 April 04, 2008, I exposed the within described real estate of Sharon K. Young And Richard L. Young to public venue or outcry at which time and place I sold the same to CITIFINANCIAL SERVICES, INC. he/she being the highest bidder, for the sum of \$25,000.00 plus costs and made the following appropriations, viz:

SHERIFF COSTS:

RDR	15.00
SERVICE	15.00
MILEAGE	16.16
LEVY	15.00
MILEAGE	16.16
POSTING	15.00
CSDS	10.00
COMMISSION	500.00
POSTAGE	4.92
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	25,000.00
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	500.00
TOTAL SHERIFF COSTS	\$1,232.24

DEED COSTS:

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	30.50
TRANSFER TAX 2%	0.00
TOTAL DEED COSTS	\$30.50

PLAINTIFF COSTS, DEBT AND INTEREST:

DEBT-AMOUNT DUE	36,987.99
INTEREST @ %	0.00
FROM 12/20/2007 TO 04/04/2008	

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	\$37,027.99

COSTS:

ADVERTISING	690.10
TAXES - COLLECTOR	361.09
TAXES - TAX CLAIM	49.57
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	30.50
SHERIFF COSTS	1,232.24
LEGAL JOURNAL COSTS	126.00
PROTHONOTARY	125.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
TOTAL COSTS	\$2,759.50

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