

08-493-CD

Cit Group al vs Tuesday Passmore et al

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

The CIT Group/Consumer
Finance, Inc.
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

Tuesday L. Passmore
Leo W. Coble
Defendant(s)

NO. 08-493-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Please issue Writ of Execution in the above matter:

Amount due	\$ <u>152,168.12</u>	Prothonotary costs
Interest From <u>7/27/08</u>	<u>142.00</u>	
to Date of Sale _____		
Ongoing Per Diem of <u>\$76.50</u>		
to actual date of sale including if sale is held at a later date		
(Costs to be added)	\$ _____	

UDREN LAW OFFICES, P.C.

BY: Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

FILED
JUL 30 2008
11:02 AM
William A. Shaw
Prothonotary/Clerk of Courts
Any pd. 20.00
ICC & 6 writs
w/ prop. desc. to
Sheriff

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

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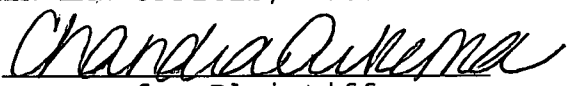
C E R T I F I C A T E

I hereby state that as the attorney for the Plaintiff in the above-captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

- () An FHA insured mortgage
- () Non-owner occupied
- () Vacant
- (X) Act 91 procedures have been fulfilled.
- () Over 24 months delinquent.

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

UDREN LAW OFFICES, P.C.

BY: 
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

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CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-493-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

The CIT Group/Consumer Finance, Inc., Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at: 374 Pifer Road, Clearfield, PA 16830

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

Name

Address

Tuesday L. Passmore

933 Old Turnpike Road
Allport, PA 16821

374 Pifer Road
Clearfield, PA 16830

Leo W. Coble

933 Old Turnpike Road
Allport, PA 16821

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

Name

Address

SAME AS #1 ABOVE

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

Name

Address

Eugene Shadeck

Address to Follow

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

Name	Address
The CIT Group/Consumer Finance, Inc.	715 South Metropolitan Avenue Suite 150, Oklahoma City, OK 73108

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

Name	Address
------	---------

None

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

Name	Address
Real Estate Tax Dept.	1 North Second St., Ste. 116, Clearfield, PA 16830
Domestic Relations Section	1 North Second St., Ste. 116, Clearfield, PA 16830
Commonwealth of PA, Department of Revenue	Bureau of Compliance, PO Box 281230 Harrisburg, PA 17128-1230

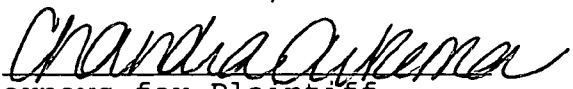
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale:

Name	Address
Tenants/Occupants	374 Pifer Road Clearfield, PA 16830

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. sec. 4904 relating to unsworn falsification to authorities.

DATED: July 26, 2008

UDREN LAW OFFICES, P.C.

BY: 
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

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CHERRY HILL, NJ 08003-3620
856-669-5400
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ATTORNEY FOR PLAINTIFF

COPY

The CIT Group/Consumer
Finance, Inc.

Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-493-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

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

374 Pifer Road
Clearfield, PA 16830
SEE LEGAL DESCRIPTION ATTACHED

Amount due

\$152,168.12
142.00

Prothonotary costs

Interest From 7/27/08

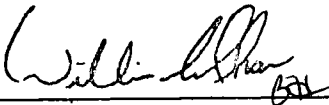
to Date of Sale _____
Ongoing Per Diem of \$76.50
to actual date of sale including if sale is
held at a later date

(Costs to be added)

\$ _____

Prothonotary

By



Clerk

Date

7/30/08

COURT OF COMMON PLEAS

NO. 08-493-CD

=====

The CIT Group/Consumer Finance, Inc.

vs.

Tuesday L. Passmore

Leo W. Coble

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 152,168.12

INTEREST \$ _____

from 7/27/08

to Date of Sale _____

Ongoing Per Diem of \$76.50

to actual date of sale including if sale is
held at a later date

COSTS PAID:

PROTHY \$ 142.00

SHERIFF \$ _____

STATUTORY \$ _____

COSTS DUE PROTHY. \$ _____

PREMISES TO BE SOLD:

374 Pifer Road

Clearfield, PA 16830



UDREN LAW OFFICES, P.C.

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STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

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WOODCREST CORPORATE CENTER

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CHERRY HILL, NJ 08003-3620

(856) 669-5400

pleadings@udren.com

EXHIBIT "A"
LEGAL DESCRIPTION

ALL that piece or parcel of land situate in Lawrence Township, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a point on the Mt. Joy Road, the corner of Mrs. John Butler; thence East 40.82 perches to post; thence South 56 perches to post; thence North 86 1/2 degrees East 66 perches to township road; thence along said township road its several courses to the place of beginning. Containing 18 acres and 75 perches, more or less.

BEING known as Parcel #123-K07-000-00048.

EXCEPTING AND RESERVING therefrom a certain tract or lot of ground consisting of one (1) acre which was conveyed to the Mt. Joy Cemetery Association, a full description of which will more fully appear by a deed recorded in Deed Book 106 at Page 199.

ALSO EXCEPTING AND RESERVING all that certain parcel of land consisting of approximately 10 acres acquired by the Commonwealth of Pennsylvania for the construction of Route No. 1009, more popularly known as Interstate 80 Keystone Shortway. A description of the premises acquired by the Commonwealth of Pennsylvania appears on Sheets No. 8, 9, 10, 12 and 52 of the right-of-way plan for Route No. 1009, Section No. 29, Clearfield County, Pennsylvania, approved by the Governor of the Commonwealth of Pennsylvania on August 25, 1964.

ALSO EXCEPTING AND RESERVING all that certain parcel of land previously conveyed by the Grantors herein by deed dated June 8, 1971, and recorded in Deed Book 576 at Page 416, to Luther Ogden and Lee M. Lanich and Esther C. Lanich, as joint tenants, with the right of survivorship. Said parcel of land adjoins the land of the Mt. Joy Cemetery.

ALSO EXCEPTING AND RESERVING all the coal and coal rights as contained in the deed by Tamer Elizabeth Lutz to R.H. Thompson by a deed dated March 27, 1907, in Deed Book 166 at Page 108.

BEING the same premises which Lee M. Lanich and Esther C. Lanich, his wife, by deed dated July 15, 1971 and recorded July 15, 1971 in Clearfield County in Deed Book Volume 577, Page 150, granted and conveyed unto Nicholas Mayhew and Hilda Mayhew, husband and wife, as tenants by the entireties.

BEING KNOWN AS: 374 Pifer Road
 Clearfield, PA 16830

PROPERTY ID NO.: 123-1607-000-00048

TITLE TO SAID PREMISES IS VESTED IN TUESDAY L. PASSMORE, A SINGLE MAN AND LEO W. COBLE, A SINGLE MAN BY DEED FROM NICHOLAS MAYHEW AND HILDA MAYHEW, HUSBAND AND WIFE DATED 12/1/05 RECORDED 12/8/08 INSTRUMENT NO.: 200521247.

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
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LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
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CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

FILED *Atty pd. 95.00*
MAR 19 2008
William A. SRAW
Prothonotary/Clerk of Courts
4 CC Sheriff

The CIT Group/Consumer Finance,
Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821
Defendant(s)

NO. 08-493-CD

COMPLAINT IN MORTGAGE FORECLOSURE

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.

LAWYERS REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982

June 5, 2008 Document
Reinstated/Reissued to Sheriff Attorney
for service
William A. SRAW GK
Deputy Prothonotary

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: Mortgage Electronic Registration Systems, Inc.
Assignments of Record to: The CIT Group/Consumer Finance, Inc.
Recording Date: **LODGED FOR RECORDING**

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 374 Pifer Road
MUNICIPALITY/TOWNSHIP/BOROUGH: Lawrence Township
COUNTY: Clearfield
DATE EXECUTED: 12/1/05
DATE RECORDED: 12/8/05 BOOK: 200521248

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

- (a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated below;
- (b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 2/8/08:

Principal of debt due	\$125,820.49
Unpaid Interest at 10.99% * from 7/1/07 to 2/8/08 (the per diem interest accruing on this debt is \$76.50 and that sum should be added each day after 2/8/08)	5,911.71
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$46.79 should be added in accordance with the terms of the note each month after 2/8/08)	237.16
Corporate Advance	93.50
Attorneys Fees (anticipated and actual to 5% of principal)	<u>6,291.02</u>
TOTAL	\$138,958.88

* This interest rate is subject to adjustment as more fully set forth in the Note and Mortgage.

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been

sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$138,958.88 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

LOUIS A. SIMONI, ESQUIRE

EXHIBIT "A"
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BEING the same premises which Lee M. Lanich and Esther C. Lanich, his wife, by deed dated July 15, 1971 and recorded July 15, 1971 in Clearfield County in Deed Book Volume 577, Page 150, granted and conveyed unto Nicholas Mayhew and Hilda Mayhew, husband and wife, as tenants by the entireties.

ACT 91 NOTICE 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 an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDITAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

EXHIBIT A

HOMEOWNER'S NAME(S): Tuesday L. Passmore
Leo W. Coble
PROPERTY ADDRESS: 374 Pifer Road
Clearfield, PA 16830
LOAN ACCT. NO.: 9800402852
ORIGINAL LENDER: Wilmington Finance
CURRENT LENDER: The CIT Group

HOMEOWNER'S 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 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 complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your

face- 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:

**374 Pifer Road
Clearfield, PA 16830**

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:

<u>Monthly Payments of \$935.76 for August 1, 2007 through February 1, 2008 = \$6550.32</u>	
<u>Monthly Late Charges of \$46.79 for August 1, 2007 through January 1, 2008 = \$237.16</u>	
<u>Other charges (explain/itemize): Partial Payment = \$935.74</u>	
TOTAL AMOUNT PAST DUE:	<u>\$7723.22</u>

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable): **N/A**

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 \$7723.22**, 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 sent to:

**Udren Law Offices, P.C.
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620**

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.): **N/A**

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 begins 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 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. If your debt has been discharged in bankruptcy without your having reaffirmed it, then lender cannot pursue this remedy.

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 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/Service:	<u>CIT</u>
Address:	<u>715 South Metropolis Avenue</u> <u>Suite 150</u> <u>Oklahoma City, OK 73108</u>
Phone Number:	<u>1-800-621-1437</u>
Fax Number:	<u>1-405-553-4790</u>
Contact Person:	<u>Customer Service</u>

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 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.

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400**

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.

CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY

CLEARFIELD COUNTY

Keystone Economic Development Corporation
1954 Mary Grace Lane
Johnstown, PA 15901
(814) 535-6556
FAX (814) 539-1688

Indiana Co. Community Action Program
827 Water Street, Box 187
Indiana, PA 15701
(724) 465-2657
FAX (412) 465-5118

CCCS of Western Pennsylvania, Inc.
217 E. Plank Road
Altoona PA 16602
(814) 944-8100
FAX (814) 944-5747

CCCS of Northeastern PA
1631 S Atherton St., Suite 100
State College, PA 16801
(814) 238-3668
FAX (814) 238-3669

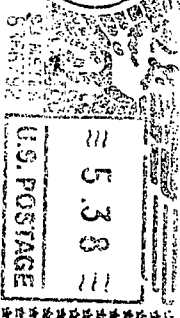
CCCS of Western PA
219-A College Park Plaza
Johnstown PA 15904
(814) 539-6335
FAX n/a

DEBEN LAY OFFICES, P.C.
WOODCREST CORPORATION
11 WOODCREST L.
CHERRY HILL, NJ

E469 9280 0000 0206 2002



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL™



Leo W. Goble
933 Old Turnpike Road
Allport, PA 16821

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain *Return Receipt* service, please complete and attach a *Return Receipt* (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Lee W. Coble
933 Old Turnpike Road
Allport, PA 16821

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7007 3020 0000 0876 6943

PS Form 3811, February 2004

Domestic Return Receipt

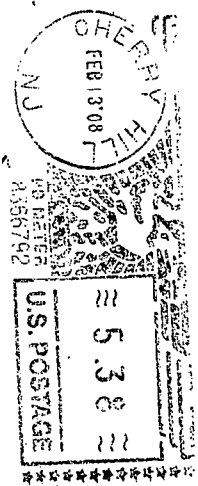
102595-02-M-1540

CHERRY HILL LAW OFFICES, P.A.
CORPORATE CENTER
3300 N. J. TURNPIKE
CHERRY HILL, N.J. 08001

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE.
CERTIFIED MAIL



9E69 9280 0000 020E 2002



Leo W. Goble
374 Pifer Road
Clearfield, PA 16830

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.

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PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Leo W. Coble
374 R. Fer Road
Clearfield, PA 16830

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number
(Transfer from service label)

7007 3020 0000 0876 6936

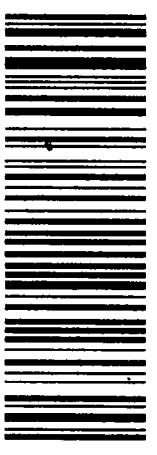
PS Form 3811, February 2004

Domestic Return Receipt

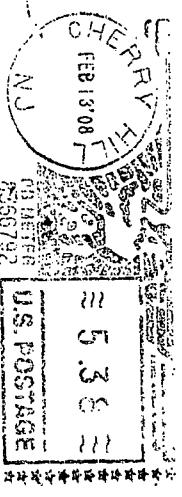
102595-02-M-1540

DREN LAW OFFICE, P.C.
FOREST CORPORATE CENTER
1000 FOREST ROAD
CHERRY HILL, NJ 08002

6269 9280 0000 020E 2002



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL™



Tuesday L. Passmore
933 Old Turnpike Road
Airport, PA 16821

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
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PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number
(Transfer from service label)

7007 3020 0000 0876 6929

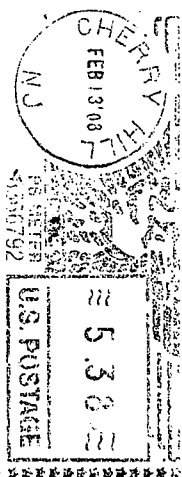
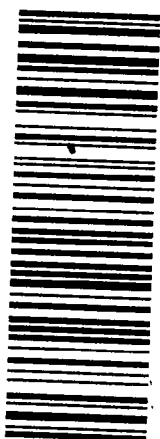
PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

STRENN LAW OFFICE
WEST CORPORATE CENTER
1000 OGDEN ROAD
CHERRY HILL, NJ 08003

2169 9280 0000 0206 2002



Tuesday L. Passmore
374 Rifer Road
Clearfield, PA 16830

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

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- Certified Mail is not available for any class of international mail.
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IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tuesday L. Passmore
374 P.fer Road
Clearfield, PA 16830

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7007 3020 0000 0876 6912

PS Form 3811, February 2004

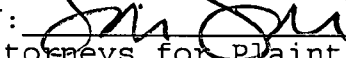
Domestic Return Receipt

102595-02-M-1540

V E R I F I C A T I O N

The undersigned, hereby states that he/she is the attorney for the Plaintiff, a corporation unless designated otherwise; that he/she is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he/she has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his/her knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

BY: 
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE
— LOUIS A. SIMONI, ESQUIRE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
CIVIL DIVISION

The CIT Group/Consumer
Finance, Inc.
Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

O R D E R

AND NOW, this day of , 2008, upon consideration of Plaintiff's Motion and the Affidavit of Good Faith investigation attached hereto, it is hereby ORDERED that service of the Complaint in Mortgage Foreclosure and all subsequent pleadings on Defendant(s), Tuesday L. Passmore, shall be complete when Plaintiff or its counsel or agent has mailed true and correct copies of the Complaint in Mortgage Foreclosure and all subsequent pleadings by certified mail and regular mail to the last known address of Defendant(s), Tuesday L. Passmore at 933 Old Turnpike Road, Allport, PA 16821 and by posting the mortgaged premises located at 374 Pifer Road, Clearfield (Lawrence Township), PA 16830.

BY THE COURT:

J.

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400, pleadings@udren.com

ATTORNEY FOR PLAINTIFF

FILED *Mo CC*
m110:5682
MAY 27 2008 *@P*

William A. Shaw
Prothonotary/Clerk of Courts

The CIT Group/Consumer
Finance, Inc.
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.
Tuesday L. Passmore
Leo W. Coble
Defendant(s)

NO. 08-493-CD

MOTION FOR SPECIAL SERVICE PURSUANT
TO SPECIAL ORDER OF COURT

Plaintiff, by its counsel, moves this Honorable Court for an Order directing service of the Complaint in Mortgage Foreclosure upon Defendant(s), Tuesday L. Passmore by regular mail and certified mail and by posting the mortgaged premises and in support thereof avers the following:

1. The last known address of Defendant(s) is 933 Old Turnpike Road, Allport, PA 16821.

2. Process was unable to be served at 933 Old Turnpike Road, Allport, PA 16821. A copy of the Verification of Service is attached hereto as Exhibit A.

3. Process was also unable to be served 374 Pifer Road, Clearfield, PA 16830, which is the mortgaged premises. A copy of the Verification of Service is attached hereto as Exhibit B.

4. Pursuant to Pa.R.C.P. 430, Plaintiff made a Good Faith Investigation, the report thereof being attached hereto as Exhibit C.

5. Said investigation was unable to determine an alternate address for said Defendant(s).

WHEREFORE, Plaintiff prays and respectfully requests that this Honorable Court enter an Order pursuant to Pa.R.C.P. 430 directing service of the Complaint in Mortgage Foreclosure upon said Defendant(s), Tuesday L. Passmore by regular mail and certified mail and by posting the mortgaged premises.

UDREN LAW OFFICES, P.C.

BY: Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302

STUART WINNEG, ESQUIRE - ID #45362

LORRAINE DOYLE, ESQUIRE - ID #34576

ALAN M. MINATO, ESQUIRE - ID #75860

CHANDRA M. ARKEMA, ESQUIRE - ID #203437

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400, pleadings@udren.com

The CIT Group/Consumer

Finance, Inc.

Plaintiff

v.

Tuesday L. Passmore

Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS

CIVIL DIVISION

Clearfield County

NO. 08-493-CD

MEMORANDUM OF LAW

Pennsylvania Rule of Civil Procedure 430(a) specifically provides:

(a) If service cannot be made under the applicable rule the plaintiff may move the court for a special order directing the method of service. The motion shall be accompanied by an affidavit stating the nature and extent of the investigation which has been made to determine the whereabouts of the defendant and the reasons why service cannot be made.

NOTE: A sheriff's return of "not found" or the fact that a defendant has moved without leaving a new forwarding address is insufficient evidence of concealment. Gonzales vs. Polis, 238 Pa. Super. 362, 357 A.2d 580 (1976). Notice of intended adoption mailed to last known address requires a "good faith effort" to discover the correct address. Adoption of Walker, 468 Pa. 165, 360 A2d 603 (1976).

An illustration of a good faith effort to locate the defendant includes (1) inquiries of postal authorities including inquiries pursuant to the Freedom of Information Act, 39 C.F.R. Part 265, (2) inquiries of relatives, neighbors, friends and employers of the defendant and (3) examinations of local telephone directories, voter registration records, local tax records, and motor vehicle records.

As set forth in the Verification of Service marked Exhibit A and B, the Sheriff and/or Process Server has been unable to serve the Complaint in Mortgage Foreclosure at the Defendant's last known address. Although Plaintiff is still unable to determine the Defendant's whereabouts, a good faith effort to discover the whereabouts of the Defendant(s) has been made as evidenced by the attached Affidavit of Good Faith Investigation marked Exhibit C.

WHEREFORE, Plaintiff prays and respectfully requests service of the Complaint in Mortgage Foreclosure upon Defendant(s) by regular mail and certified mail and by posting the mortgaged premises.

UDREN LAW OFFICES, P.C.

BY: Chandria Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400 pleadings@udren.com

The CIT Group/Consumer
Finance, Inc.
Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-493-CD

VERIFICATION OF SERVICE

Based upon information supplied by the Sheriff of Clearfield County, service of the Complaint in Mortgage Foreclosure upon the below listed Defendant(s) was unsuccessful in accordance with Pa.R.C.P. 402 or 3129.2:

Defendant: Tuesday L. Passmore

Place of Service: 933 Old Turnpike Road, Allport, PA 16821

Defendant not found because: ☐ Moved ☐ Unknown ☐ No Answer ☐
☐ Vacant ☐ Other Per the Sheriff's Department, after several attempts, service was unable to be made.

The undersigned, understands that the statements herein set forth above are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

May 22, 2008

UDREN LAW OFFICES, P.C.

BY: Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

EXHIBIT A

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302

STUART WINNEG, ESQUIRE - ID #45362

LORRAINE DOYLE, ESQUIRE - ID #34576

ALAN M. MINATO, ESQUIRE - ID #75860

CHANDRA M. ARKEMA, ESQUIRE - ID #203437

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400 pleadings@udren.com

The CIT Group/Consumer
Finance, Inc.

Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-493-CD

VERIFICATION OF SERVICE

Based upon information supplied by the Sheriff of Clearfield County, service of the Complaint in Mortgage Foreclosure upon the below listed Defendant(s) was unsuccessful in accordance with Pa.R.C.P. 402 or 3129.2:

Defendant: Tuesday L. Passmore

Place of Service: 374 Pifer Road, Clearfield, PA 16830

Defendant not found because: ☐ Moved ☐ Unknown ☐ No Answer
☒ Vacant ☐ Other _____

The undersigned, understands that the statements herein set forth above are made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

May 22, 2008

UDREN LAW OFFICES, P.C.

BY: Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

EXHIBIT B

PLAYERS NATIONAL LOCATOR**AFFIDAVIT OF GOOD FAITH INVESTIGATION**Loan Number: **08020176**Attorney Firm: **MARK J UDREN & ASSOCIATES**

Case Number:

Subject: **Tuesday L Passmore**A.K.A.: **Tuesday Lynn Passmore, Tuesday Johnson, Tuesday L Passmore**Property Address: **374 Pifer Road
Clearfield, PA 16830**Last Known Address: **933 Old Turnpike Road
Allport, PA 16821**

Last Known Number: () -

Melissa Brower, being duly sworn according to law, deposes and says:

1. I am employed in the capacity of Location Specialist for Players National Locator.
2. On 04/28/2008, I conducted an investigation into the whereabouts of the above named defendant(s). The results of my investigation are as follows:

CREDIT INFORMATIONA. SOCIAL SECURITY NUMBER(S): **177-50-0276**

B. EMPLOYMENT SEARCH:

We were unable to verify current employment for Tuesday L Passmore.

C. INQUIRY OF CREDITORS:

Creditors indicated the last reported address for Tuesday L Passmore is 374 Pifer Road, Clearfield, PA 16830 with no valid home number.

INQUIRY OF TELEPHONE COMPANY

A. DIRECTORY ASSISTANCE SEARCH:

Directory assistance had no listing for Tuesday L Passmore. We called (814) 236-0981 and spoke with a relative who stated Tuesday L Passmore has moved from 933 Old Turnpike Road, Allport, PA 16821 but refused to release any other information.

INQUIRY OF NEIGHBORS

We contacted 814-765-4697 registered at 562 Pifer Road and spoke with a neighbor who stated Tuesday L Passmore has moved from 374 Pifer Road, Clearfield, PA 16830. We were unable to confirm any other address.

INQUIRY OF POST OFFICE

A. NATIONAL ADDRESS UPDATE:

As of April 22, 2008 the National Change of Address (NCOA) has no change for Tuesday L Passmore from 374 Pifer Road, Clearfield, PA 16830.

MOTOR VEHICLE REGISTRATION

A. MOTOR VEHICLE & DMV OFFICE:

We were unable to verify current drivers license information for Tuesday L Passmore.

EXHIBIT C

OTHER INQUIRIES -

A. DEATH RECORDS

As of April 22, 2008 the Social Security Administration has no death record on file for Tuesday L Passmore and/or A.K.A's under the social security number provided.

B. PUBLIC LICENSES (PILOT, REAL ESTATE, ETC.):
None Found.

C. COUNTY VOTER REGISTRATION:

We were unable to confirm a listing with the County Voters Registration Office.

ADDITIONAL INFORMATION ON SUBJECT -

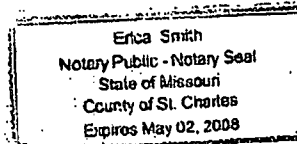
A. DATE OF BIRTH:

January 1963


AFFIANT Melissa Brower

Subscribed and sworn to before me on 04/28/2008


NOTARY PUBLIC



Players National Locator 174 Clarkson Road, Ste 225, Ellisville, MO 63011
(636) 250-9922 (636) 230-0558

VERIFICATION

The undersigned hereby states that he/she is the Attorney for the Plaintiff in this action, that he/she is authorized to take this Verification, and that the statements made in the foregoing MOTION FOR SPECIAL SERVICE PURSUANT TO SPECIAL ORDER OF COURT are true and correct to the best of his/her knowledge, information and belief.

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

Date: May 22, 2008

UDREN LAW OFFICES, P.C.

BY: Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400, pleadings@udren.com

The CIT Group/Consumer
Finance, Inc.
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

Tuesday L. Passmore
Leo W. Coble
Defendant(s)

NO. 08-493-CD

CERTIFICATE OF SERVICE

I, hereby certify that I have served true and correct copies of the attached Motion For Special Service upon the following person(s) named herein at their last known address or their attorney of record by:

 x Regular First Class Mail
 Certified Mail
 Other

Date Served: May 22, 2008

TO: Tuesday L. Passmore
933 Old Turnpike Road, Allport, PA 16821
and
374 Pifer Road, Clearfield, PA 16830

UDREN LAW OFFICES, P.C.

BY: Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

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

THE CIT GROUP/CONSUMER FINANCE, INC.
Plaintiff

vs.

TUESDAY L. PASSMORE
LEO W. COBLE

Defendants

*
*
*
*
*

NO. 08-493-CD

ORDER

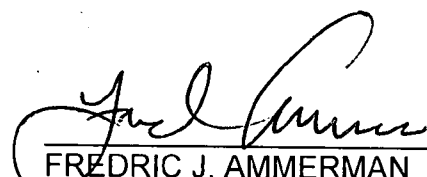
NOW, this 2nd day of May, 2008, the Plaintiff is granted leave to serve the
Complaint in Mortgage Foreclosure upon the Defendant **TUESDAY L. PASSMORE**
by:

1. Publication one time in The Progress (Clearfield) and the Clearfield
County Legal Journal;
2. By first class mail to 374 Pifer Road, Clearfield, PA 16830 and 933
Old Turnpike Road, Allport, PA 16821;
3. By certified mail, return receipt requested, to 374 Pifer Road,
Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA
16821; and
4. By posting the mortgaged premises known in this herein action as
374 Pifer Road, Clearfield, PA 16830.

Service of the aforementioned publication and mailings is effective upon the
date of publication and mailing and is to be done by Plaintiff's attorney, who will file
Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,

FILED
0 11:55am BK
MAY 28 2008
William A. Shaw
Prothonotary/Clerk of Courts
3cc to
ATTY. ARKEMA
62


FREDRIC J. AMMERMAN
President Judge

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400, pleadings@udren.com

The CIT Group/Consumer
Finance, Inc.

Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

NO. 08-493-CD

VERIFICATION OF SERVICE BY CERTIFIED MAIL AND
REGULAR MAIL PURSUANT TO COURT ORDER

The undersigned hereby verifies that he is counsel for Plaintiff in the above case and that pursuant to the Court order issued in this matter he mailed a true and correct copy of the Complaint in Mortgage Foreclosure to Defendant(s), by certified mail and regular first class mail, to the last known address of Defendant(s) as follows:

DATE MAILED: 6/10/08

Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821

I verify that the statements made herein are true and correct and I understand that false statements made herein are subject to the penalties relating to unsworn falsification to authorities.

Dated: 6/11/08

UDREN LAW OFFICES, P.C.

BY: *Chandra Arkema*
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

FILED

11:19am Gx
JUN 16 2008

(62)

NOCC

William A. Shaw
Prothonotary/Clerk of Courts

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
CHERRY HILL, NJ 08003

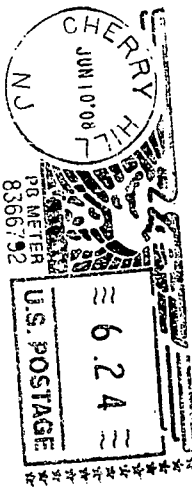
Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL™



9E95 2290 0000 020E 2002
9E95 2290 0000 020E 2002



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

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

OFFICIAL USE

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

Postmark
Here

Sent to Tuesday L. Passmore
Street, Apt. No.,
or PO Box No. 933 Old Turnpike Rd
City, State, ZIP+4 Allport, PA 16821

PS Form 3800, August 2006

See Reverse for Instructions

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider insured or Registered Mail.

- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain *Return Receipt* service, please complete and attach a *Return Receipt* (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Tuesday, Rossmore
033 Old Turnpike Rd
Allport, PA 16821

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent ☐ Addressee

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

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

2 7007 3020 0000 0872 5636

PS Form 3811, February 2004

Domestic Return Receipt

10295-02-M-1540

NIKKI

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
CHERRY HILL, NJ 08003

Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL™



6295 2280 0000 0202 4002
6295 2280 0000 0202 4002

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

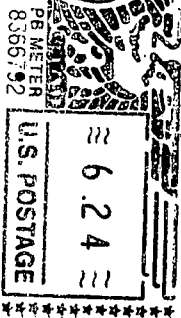
For delivery information visit our website at www.usps.com
OFFICIAL USE

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

Postmark
Here

Sent To Tuesday L. Passmore
Street, Apt. No.,
or PO Box No. 374 Pifer Road
City, State, Zip+4 Clearfield, PA 16830

PS Form 3800, August 2005 See Reverse for Instructions



Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For

For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.

For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".

■ If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Tuesday C. ROSSMORE
374 8th Ave
Clearfield, PA 16830

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. 7007 3020 0000 0872 5629

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

NIKKI

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104252
NO: 08-493-CD
SERVICES 1
COMPLAINT IN MORTGAGE FORECLOSURE &

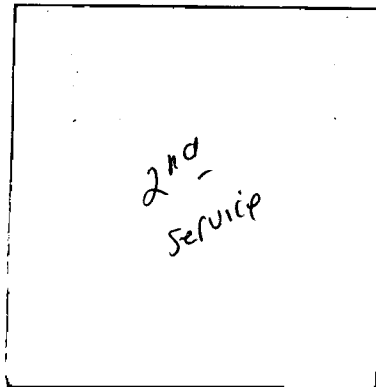
ORDER

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE INC.
vs.
DEFENDANT: TUESDAY L. PASSMORE and LEO W. COBLE

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	114453	10.00
SHERIFF HAWKINS	UDREN	114453	11.00



FILED
0/2:20 PM
JUL 07 2008

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

____ Day of _____ 2008

So Answers,

A handwritten signature in cursive script, appearing to read "Chester A. Hawkins".

Chester A. Hawkins
Sheriff

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 4 Services

Sheriff Docket # **103913**

THE CIT GROUP/Consumer Finance Inc.

Case # 08-493-CD

vs.

TUESDAY L. PASSMORE and LEO W. COBLE

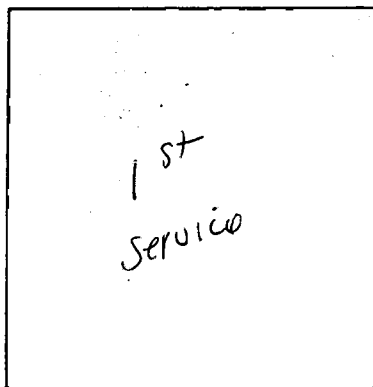
TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE .

SHERIFF RETURNS

NOW July 07, 2008 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO TUESDAY L. PASSMORE, DEFENDANT. WHEREABOUTS UNKNOWN.

374 PIFER ROAD, CLEARFIELD, PA. "VACANT".

SERVED BY: /



FILED

0/2:20 cm

JUL 07 2008

(LM)

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103913
NO: 08-493-CD
SERVICE # 2 OF 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: THE CIT GROUP/Consumer Finance Inc.
vs.
DEFENDANT: TUESDAY L. PASSMORE and LEO W. COBLE

SHERIFF RETURN

NOW, April 01, 2008 AT 11:33 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON LEO W. COBLE DEFENDANT AT 933 OLD TURNPIKE ROAD, ALLPORT, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RUTH COBLE, MOTHER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

374 PIFER ROAD, CLEARFIELD, PA. "VACANT"

SERVED BY: HUNTER / DEHAVEN

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 3 of 4 Services

Sheriff Docket # **103913**

THE CIT GROUP/Consumer Finance Inc.

Case # 08-493-CD

vs.

TUESDAY L. PASSMORE and LEO W. COBLE

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW July 07, 2008 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO TUESDAY L. PASSMORE, DEFENDANT. WHEREABOUTS UNKNOWN.

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103913
NO: 08-493-CD
SERVICE # 4 OF 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: THE CIT GROUP/Consumer Finance Inc.
vs.
DEFENDANT: TUESDAY L. PASSMORE and LEO W. COBLE

SHERIFF RETURN

NOW, April 01, 2008 AT 11:33 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON LEO W. COBLE DEFENDANT AT 933 OLD TURNPIKE ROAD, ALLPORT, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RUTH COBLE, MOTHER 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 # 103913
NO: 08-493-CD
SERVICES 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: THE CIT GROUP/Consumer Finance Inc.
vs.
DEFENDANT: TUESDAY L. PASSMORE and LEO W. COBLE

SHERIFF RETURN

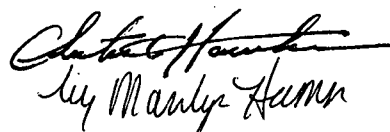
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	110038	40.00
SHERIFF HAWKINS	UDREN	110038	51.16

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

"WE HEREBY CERTIFY THE
WITHIN TO BE TRUE AND
CORRECT COPY OF THE ORIGINAL"

The CIT Group/Consumer Finance,
Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

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

MAR 19 2008

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821

Defendant(s)

Attest.

NO. 08-493-CD

William L. Shaw
Prothonotary/
Clerk of Courts

COMPLAINT IN MORTGAGE FORECLOSURE

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.

LAWYERS REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademàs, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: Mortgage Electronic Registration Systems, Inc.

Assignments of Record to: The CIT Group/Consumer Finance, Inc.

Recording Date: **LODGED FOR RECORDING**

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 374 Pifer Road

MUNICIPALITY/TOWNSHIP/BOROUGH: Lawrence Township

COUNTY: Clearfield

DATE EXECUTED: 12/1/05

DATE RECORDED: 12/8/05 BOOK: 200521248

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

(a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated below;

(b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 2/8/08:

Principal of debt due	\$125,820.49
Unpaid Interest at 10.99% * from 7/1/07 to 2/8/08 (the per diem interest accruing on this debt is \$76.50 and that sum should be added each day after 2/8/08)	5,911.71
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$46.79 should be added in accordance with the terms of the note each month after 2/8/08)	237.16
Corporate Advance	93.50
Attorneys Fees (anticipated and actual to 5% of principal)	<u>6,291.02</u>
TOTAL	\$138,958.88

* This interest rate is subject to adjustment as more fully set forth in the Note and Mortgage.

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been

sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$138,958.88 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

LOUIS A. SIMONI, ESQUIRE

EXHIBIT "A"
LEGAL DESCRIPTION

ALL that piece or parcel of land situate in Lawrence Township, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a point on the Mt. Joy Road, the corner of Mrs. John Butler; thence East 40.82 perches to post; thence South 56 perches to post; thence North 86 1/2 degrees East 66 perches to township road; thence along said township road its several courses to the place of beginning. Containing 18 acres and 75 perches, more or less.

BEING known as Parcel #123-K07-000-00048.

EXCEPTING AND RESERVING therefrom a certain tract or lot of ground consisting of one (1) acre which was conveyed to the Mt. Joy Cemetery Association, a full description of which will more fully appear by a deed recorded in Deed Book 106 at Page 199.

ALSO EXCEPTING AND RESERVING all that certain parcel of land consisting of approximately 10 acres acquired by the Commonwealth of Pennsylvania for the construction of Route No. 1009, more popularly known as Interstate 80 Keystone Shortway. A description of the premises acquired by the Commonwealth of Pennsylvania appears on Sheets No. 8, 9, 10, 12 and 52 of the right-of-way plan for Route No. 1009, Section No. 29, Clearfield County, Pennsylvania, approved by the Governor of the Commonwealth of Pennsylvania on August 25, 1964.

ALSO EXCEPTING AND RESERVING all that certain parcel of land previously conveyed by the Grantors herein by deed dated June 8, 1971, and recorded in Deed Book 576 at Page 416, to Luther Ogden and Lee M. Lanich and Esther C. Lanich, as joint tenants, with the right of survivorship. Said parcel of land adjoins the land of the Mt. Joy Cemetery.

ALSO EXCEPTING AND RESERVING all the coal and coal rights as contained in the deed by Tamer Elizabeth Lutz to R.H. Thompson by a deed dated March 27, 1907, in Deed Book 166 at Page 108.

BEING the same premises which Lee M. Lanich and Esther C. Lanich, his wife, by deed dated July 15, 1971 and recorded July 15, 1971 in Clearfield County in Deed Book Volume 577, Page 150, granted and conveyed unto Nicholas Mayhew and Hilda Mayhew, husband and wife, as tenants by the entireties.

ACT 91 NOTICE 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 an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDITAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

EXHIBIT A

HOMEOWNER'S NAME(S): Tuesday L. Passmore
Leo W. Coble
PROPERTY ADDRESS: 374 Pifer Road
Clearfield, PA 16830
LOAN ACCT. NO.: 9800402852
ORIGINAL LENDER: Wilmington Finance
CURRENT LENDER: The CIT Group

HOMEOWNER'S 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 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 complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your

face- 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:

374 Pifer Road
Clearfield, PA 16830

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:

Monthly Payments of \$935.76 for August 1, 2007 through February 1, 2008 = \$6550.32

Monthly Late Charges of \$46.79 for August 1, 2007 through January 1, 2008 = \$237.16

Other charges (explain/itemize): Partial Payment = \$935.74

TOTAL AMOUNT PAST DUE: \$7723.22

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable): **N/A**

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 \$7723.22**, 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 sent to:

Udren Law Offices, P.C.
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.): **N/A**

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 begins 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 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. If your debt has been discharged in bankruptcy without your having reaffirmed it, then lender cannot pursue this remedy.

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 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/Service:	<u>CIT</u>
Address:	<u>715 South Metropolis Avenue</u>
	<u>Suite 150</u>
	<u>Oklahoma City, OK 73108</u>
Phone Number:	<u>1-800-621-1437</u>
Fax Number:	<u>1-405-553-4790</u>
Contact Person:	<u>Customer Service</u>

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 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.

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400**

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.

CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY

CLEARFIELD COUNTY

Keystone Economic Development Corporation
1954 Mary Grace Lane
Johnstown, PA 15901
(814) 535-6556
FAX (814) 539-1688

CCCS of Western Pennsylvania, Inc.
217 E. Plank Road
Altoona PA 16602
(814) 944-8100
FAX (814) 944-5747

CCCS of Western PA
219-A College Park Plaza
Johnstown PA 15904
(814) 539-6335
FAX n/a

Indiana Co. Community Action Program
827 Water Street, Box 187
Indiana, PA 15701
(724) 465-2657
FAX (412) 465-5118

CCCS of Northeastern PA
1631 S Atherton St., Suite 100
State College, PA 16801
(814) 238-3668
FAX (814) 238-3669

ALBERTA LAW OFFICES P.C.
WOODCREST CORPORATION
111 WOODCREST
CHERRY HILL, NJ 08002

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAILTM



7007 3020 0000 0000 2000



Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Lee W. Coble
933 Old Turnpike Road
Allport, PA 16821

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number

(Transfer from service label)

7007 3020 0000 0876 6943

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

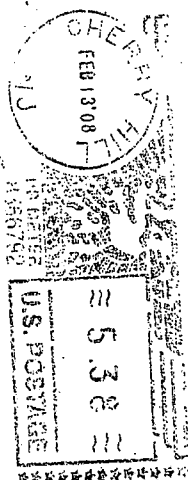
CHERRY HILL
111 WOODBURN AVE
CORPORATE CENTER
CHERRY HILL, NJ 08002

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS FOLD AT DOTTED LINE
CERTIFIED MAIL



9569 9280 0000 0202 2002

Leo W. Goble
374 Rifer Road
Clearfield, PA 16830



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PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Leo W. Coble
374 R. Fer Road
Clearfield, PA 16830

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number (Transfer from service label) 7007 3020 0000 0876 6936

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

11
 5.38
 11
 U.S. POSTAGE

7007 3020 0000 0876 6929

Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821

Certified Mail Provides:

- A mailing receipt
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Important Reminders:

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valuable, please consider Insured or Registered Mail.

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PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tuesday L. Passmore
933 Old Turnpike Road
Arlington, PA 16821

COMPLETE THIS SECTION ON DELIVERY

A. Signature:

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7007 3020 0000 0876 6929

PS Form 3811, February 2004

Domestic Return Receipt

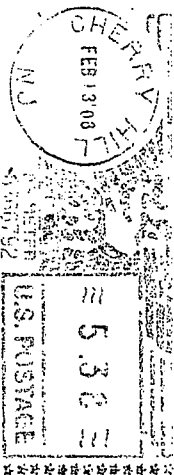
102595-02-M-1540

GREEN LAW OFFICE
100 WEST CORPORATE CENTER
100 WEST CORPORATE CENTER
ROCKY HILL, NJ 07866

2769 9290 0000 0206 2002



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS FOLD AT DOTTED LINE
CERTIFIED MAIL™



Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

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- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.

- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain *Return Receipt* service, please complete and attach a *Return Receipt* (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Tuesday L. Passmore
374 P.fer Road
Clearfield, PA 16830

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7007 3020 0000 0876 6912

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

V E R I F I C A T I O N

The undersigned, hereby states that he/she is the attorney"for the Plaintiff, a corporation unless designated otherwise; that he/she is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he/she has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his/her knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

— LOUIS A. SIMONI, ESQUIRE

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

"WE HEREBY CERTIFY THE
WITHIN TO BE TRUE AND
CORRECT COPY OF THE ORIGINAL"

The CIT Group/Consumer Finance,
Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION

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

Clearfield County

MAR 19 2008

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821

Defendant(s)

Attest.

William A. Shaw
Prothonotary/
Clerk of Courts

NO. 08-493-CD

COMPLAINT IN MORTGAGE FORECLOSURE

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.

LAWYERS REFERRAL SERVICE
David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: Mortgage Electronic Registration Systems, Inc.

Assignments of Record to: The CIT Group/Consumer Finance, Inc.

Recording Date: **LODGED FOR RECORDING**

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 374 Pifer Road

MUNICIPALITY/TOWNSHIP/BOROUGH: Lawrence Township

COUNTY: Clearfield

DATE EXECUTED: 12/1/05

DATE RECORDED: 12/8/05 BOOK: 200521248

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

(a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated below;

(b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 2/8/08:

Principal of debt due	\$125,820.49
Unpaid Interest at 10.99% * from 7/1/07 to 2/8/08 (the per diem interest accruing on this debt is \$76.50 and that sum should be added each day after 2/8/08)	5,911.71
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$46.79 should be added in accordance with the terms of the note each month after 2/8/08)	237.16
Corporate Advance	93.50
Attorneys Fees (anticipated and actual to 5% of principal)	<u>6,291.02</u>
TOTAL	\$138,958.88

* This interest rate is subject to adjustment as more fully set forth in the Note and Mortgage.

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. The combined notice specified by the Pennsylvania Homeowner's Emergency Mortgage Assistance Program, Act 91 of 1983 and Notice of Intention to Foreclose under Act 6 of 1974 has been

sent to each defendant, via certified and regular mail, in accordance with the requirements of those acts, on the date appearing on the copy attached hereto as Exhibit "A", and made part hereof, and defendant(s) have failed to proceed within the time limits, or have been determined ineligible, or Plaintiff has not been notified in a timely manner of Defendant(s) eligibility.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$138,958.88 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

LOUIS A. SIMONI, ESQUIRE

EXHIBIT "A"

LEGAL DESCRIPTION

ALL that piece or parcel of land situate in Lawrence Township, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a point on the Mt. Joy Road, the corner of Mrs. John Butler; thence East 40.82 perches to post; thence South 56 perches to post; thence North 86 1/2 degrees East 66 perches to township road; thence along said township road its several courses to the place of beginning. Containing 18 acres and 75 perches, more or less.

BEING known as Parcel #123-K07-000-00048.

EXCEPTING AND RESERVING therefrom a certain tract or lot of ground consisting of one (1) acre which was conveyed to the Mt. Joy Cemetery Association, a full description of which will more fully appear by a deed recorded in Deed Book 106 at Page 199.

ALSO EXCEPTING AND RESERVING all that certain parcel of land consisting of approximately 10 acres acquired by the Commonwealth of Pennsylvania for the construction of Route No. 1009, more popularly known as Interstate 80 Keystone Shortway. A description of the premises acquired by the Commonwealth of Pennsylvania appears on Sheets No. 8, 9, 10, 12 and 52 of the right-of-way plan for Route No. 1009, Section No. 29, Clearfield County, Pennsylvania, approved by the Governor of the Commonwealth of Pennsylvania on August 25, 1964.

ALSO EXCEPTING AND RESERVING all that certain parcel of land previously conveyed by the Grantors herein by deed dated June 8, 1971, and recorded in Deed Book 576 at Page 416, to Luther Ogden and Lee M. Lanich and Esther C. Lanich, as joint tenants, with the right of survivorship. Said parcel of land adjoins the land of the Mt. Joy Cemetery.

ALSO EXCEPTING AND RESERVING all the coal and coal rights as contained in the deed by Tamer Elizabeth Lutz to R.H. Thompson by a deed dated March 27, 1907, in Deed Book 166 at Page 108.

BEING the same premises which Lee M. Lanich and Esther C. Lanich, his wife, by deed dated July 15, 1971 and recorded July 15, 1971 in Clearfield County in Deed Book Volume 577, Page 150, granted and conveyed unto Nicholas Mayhew and Hilda Mayhew, husband and wife, as tenants by the entireties.

ACT 91 NOTICE 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 an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDITAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

EXHIBIT A

HOMEOWNER'S NAME(S):	Tuesday L. Passmore Leo W. Coble
PROPERTY ADDRESS:	374 Pifer Road Clearfield, PA 16830
LOAN ACCT. NO.:	9800402852
ORIGINAL LENDER:	Wilmington Finance
CURRENT LENDER:	The CIT Group

HOMEOWNER'S 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 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 complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your

face- 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:

**374 Pifer Road
Clearfield, PA 16830**

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:

Monthly Payments of \$935.76 for August 1, 2007 through February 1, 2008 = \$6550.32

Monthly Late Charges of \$46.79 for August 1, 2007 through January 1, 2008 = \$237.16

Other charges (explain/itemize): Partial Payment = \$935.74

TOTAL AMOUNT PAST DUE: \$7723.22

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable): **N/A**

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 \$7723.22**, 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 sent to:

**Udren Law Offices, P.C.
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620**

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.): **N/A**

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 begins 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 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. If your debt has been discharged in bankruptcy without your having reaffirmed it, then lender cannot pursue this remedy.

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 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/Service:	CIT
Address:	715 South Metropolis Avenue Suite 150 Oklahoma City, OK 73108
Phone Number:	1-800-621-1437
Fax Number:	1-405-553-4790
Contact Person:	Customer Service

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 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.

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400

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.

CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY

CLEARFIELD COUNTY

Keystone Economic Development Corporation
1954 Mary Grace Lane
Johnstown, PA 15901
(814) 535-6556
FAX (814) 539-1688

CCCS of Western Pennsylvania, Inc.
217 E. Plank Road
Altoona PA 16602
(814) 944-8100
FAX (814) 944-5747

CCCS of Western PA
219-A College Park Plaza
Johnstown PA 15904
(814) 539-6335
FAX n/a

Indiana Co. Community Action Program
827 Water Street, Box 187
Indiana, PA 15701
(724) 465-2657
FAX (412) 465-5118

CCCS of Northeastern PA
1631 S Atherton St., Suite 100
State College, PA 16801
(814) 238-3668
FAX (814) 238-3669

JOSEPH LAW OFFICES, P.C.
WOODCREST CORPORATION
111 WOODCREST
CHICAGO, ILL. 60601

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL



7007 3020 0000 0202 2002 E469 9280



U.S. POSTAGE
\$ 5.38

Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Lee W. Coble
933 Old Turnpike Road
Alipor, PA 16821

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7007 3020 0000 0876 6943

PS Form 3811, February 2004

Domestic Return Receipt

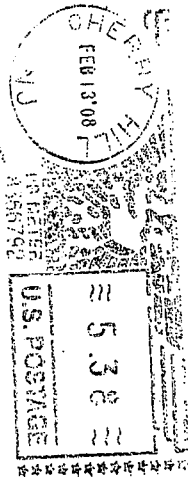
102595-02-M-1540

STON LAY OFFICES, A.
CORPORATE CENTER
111 W. 100th St. N.W.
CHERRY HILL, N.J.

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL



9669 9680 0000 0876 6936
7007 3020 0000 0876 6936



Leo W. Goble
374 Rifer Road
Clearfield, PA 16830

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.

- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain *Return Receipt* service, please complete and attach a *Return Receipt* (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Leo W. Coble
374 R. Fer Road
Clearfield PA 16830

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7007 3020 0000 0876 6936

PS Form 3811, February 2004

Domestic Return Receipt

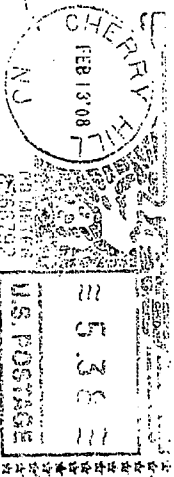
102595-02-M-1540

TIMOTHY LAWSON, P.C.
WEST CORPORA...
WOODCREST ROAD
...T, IN...

6269 9280 0000 0203 2002



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL



Tuesday L. Passmore
933 Old Tompike Road
Airport, PA 16821

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.

- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".

- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Tuesday L. Prossmore
933 Old Turnpike Road
Allport, PA 16821

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number
(Transfer from service label) 7007 3020 0000 0876 6929

PS Form 3811, February 2004

Domestic Return Receipt

102505-02-M-1540

CHERRY HILL
FEB 13 1967
NJ
5 30
U.S. POSTAGE

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL 7th

Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.

For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain *Return Receipt* service, please complete and attach a *Return Receipt* (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.

- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number
(Transfer from service label) 7007 3020 0000 0876 6912

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

V E R I F I C A T I O N

The undersigned, hereby states that he/she is the attorney for the Plaintiff, a corporation unless designated otherwise; that he/she is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he/she has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his/her knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

— LOUIS A. SIMONI, ESQUIRE

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302

STUART WINNEG, ESQUIRE - ID #45362

LORRAINE DOYLE, ESQUIRE - ID #34576

ALAN M. MINATO, ESQUIRE - ID #75860

CHANDRA M. ARKEMA, ESQUIRE - ID #203437

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400

The CIT Group/Consumer
Finance, Inc.

Plaintiff

v.

Tuesday L. Passmore

Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY:

Kindly reinstate the Complaint on the above-captioned matter.

DATE: June 2, 2008

UDREN LAW OFFICES, P.C.

BY: Chandra Arkema
Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

FILED *Atty pd.*
m/11:07 *\$7.00*
JUN 05 2008

William A. Shaw
Prothonotary/Clerk of Courts

*1 Compl. Reinstated
to Sheriff*

(62)

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

THE CIT GROUP/CONSUMER FINANCE, INC.
Plaintiff

vs.

TUESDAY L. PASSMORE
LEO W. COBLE

Defendants

NO. 08-493-CD

ORDER

NOW, this 2nd day of May, 2008, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon the Defendant **TUESDAY L. PASSMORE** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821;
3. By certified mail, return receipt requested, to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821; and
4. By posting the mortgaged premises known in this herein action as 374 Pifer Road, Clearfield, PA 16830.

Service of the aforementioned publication and mailings is effective upon the date of publication and mailing and is to be done by Plaintiff's attorney, who will file Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,


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

/s/ Fredric J. Ammerman

FREDRIC J. AMMERMAN
President Judge

MAY 28 2008

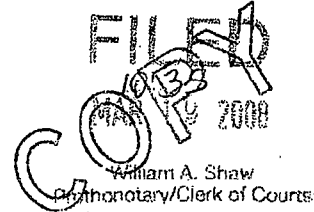
Attest.


Prothonotary/
Clerk of Court

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com



The CIT Group/Consumer Finance,
Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821

Defendant(s)

NO. 08-493CD

COMPLAINT IN MORTGAGE FORECLOSURE

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.

LAWYERS REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982

COPY

0820176 1/13/08

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-493-CD

THE CIT GROUP/CONSUMER FINANCE INC.

vs

SERVICE # 1 OF 1

TUESDAY L. PASSMORE and LEO W. COBLE

COMPLAINT IN MORTGAGE FORECLOSURE & ORDER

SERVE BY: 07/05/2008

HEARING:

PAGE: 104252

FILED

0 8:35 a.m. 6/11

JUN 11 2008

(610)

William A. Shaw
Prothonotary/Clerk of Courts

DEFENDANT: TUESDAY L. PASSMORE

ADDRESS: 374 PIFER ROAD
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH POST ON PROPERTY

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE & ORDER ON TUESDAY L. PASSMORE, DEFENDANT

BY HANDING TO _____ / _____

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED _____

NOW 6/10/08 AT 156 AM / PM **POSTED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE & ORDER FOR TUESDAY L. PASSMORE

AT (ADDRESS) 374 Pifer rd Clearfield Pa

NOW _____ AT _____ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO TUESDAY L. PASSMORE

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

[Signature]
Deputy Signature

S. Hunter
Print Deputy Name

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer
Finance, Inc.

Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

PRAECIPE TO FILE PROOF OF PUBLICATION

TO THE PROTHONOTARY:

Kindly file the attached Proof of Publication with regard to
the captioned matter.

DATE: July 10, 2008

UDREN LAW OFFICES, P.C.

BY: Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

FILED
JUL 16 2008

William A. Shaw
Prothonotary/Clerk of Courts

IN COURT OF
OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION-LAW
NO. 08-493-CD
NOTICE OF ACTION
IN MORTGAGE FORECLOSURE

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :
COUNTY OF CLEARFIELD :

SS:

On this 30th day of June, A.D. 20 08,
before me, the subscriber, a Notary Public in and for said County and
State, personally appeared Margaret E. Krebs, who being duly sworn
according to law, deposes and says that she is the President of The
Progressive Publishing Company, Inc., and Associate Publisher of The
Progress, a daily newspaper published at Clearfield, in the County of
Clearfield and State of Pennsylvania, and established April 5, 1913, and
that the annexed is a true copy of a notice or advertisement published in
said publication in

the regular issues of June 16, 2008
And that the affiant is not interested in the subject matter of the notice or
advertising, and that all of the allegations of this statement as to the time,
place, and character of publication are true.

Sworn and subscribed to before me the day and year aforesaid.

Cheryl J. Robison
Notary Public Clearfield, Pa.

My Commission Expires
October 31, 2011

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Cheryl J. Robison, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires Oct. 31, 2011
Member, Pennsylvania Association of Notaries

Gary A. Knaresboro, Esquire
Editor

Sworn and subscribed to before me the day and year aforesaid.

Sharon J. Rusey
Notary Public
My Commission Expires

NOTARIAL SEAL
SHARON J. RUSEY, Notary Public
Houtzdale, Clearfield County, PA
My Commission Expires, April 7, 2011

William J Mansfield Inc
The Woods
998 Old Eagle School Rd Suite 1209
Wayne PA 19087

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW
NO. 08-493-CD
NOTICE OF ACTION IN MORTGAGE
FORECLOSURE

THE CIT GROUP/CONSUMER
FINANCE, INC., PLAINTIFF vs. TUESDAY
L. PASSMORE and LEO W. COBLE,
DEFENDANTS.

TO: TUESDAY, L. PASSMORE,
SUSAN J. KRANTZBAUGER,
IRON RAIL ON LINE NOW OR FORMERLY
HUNDREDS FEET (795.16) TO AN
NINETY FIVE AND SIXTEEN
SECONDS WEST SEVEN HUNDRED
DEGREES THREE MINUTES FIVE
LANDS OF SAME, NORTH EIGHTY FOUR
IRON RAIL, THENCE STILL ALONG
HUNDREDS FEET (233.01) TO AN
HUNDRED THIRTY THREE AND ONE
MINUTES THIRTY SECONDS WEST TWO

1. If the Sheriff's Sale is not stopped,
your property will be sold to the highest
bidder. You may find out the price bid by
calling 856-669-5400.
2. You may be able to petition the Court
to set aside the sale if the bid price was
grossly inadequate compared to the value of
your property.
3. The sale will go through only if the
buyer pays the Sheriff the full amount due in
the sale. To find out if this has happened,
you may call 856-669-5400.
4. If the amount due from the Buyer is
not paid to the Sheriff, you will remain the

FILED

JUL 16 2008

William A. Shaw
Prothonotary/Clerk of Courts

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA

COUNTY OF CLEARFIELD

On this 20th day of June AD 2008, before me the undersigned a Notary Public in and for said County and State, personally appeared _____ a married and single of the County of _____ and State of _____ (hereinafter "Party"), and that the aforesaid is a true copy of the original document as published in said publication in the regular issue of _____ dated 20 20 08, Vol. 20, No. 20. And that all of the allegations of this statement are to the best of my belief and knowledge true and correct.

William A. Shaw

Given under my hand and seal of office on this day and year aforesaid.

Notary Public

The Notary
Notary Public for the County of _____
Notary PA 1452

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

FILED Any pd. \$20.00
7/11/08/20 Notice to
JUL 30 2008 Def.
William A. Shaw Statement to
Prothonotary/Clerk of Courts Any

The CIT Group/Consumer Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821
Defendant(s)

NO. 08-493-CD

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

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) **Tuesday L. Passmore and Leo W. Coble** 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 Complaint	\$138,958.88
Interest Per Complaint	12,928.50
From 2/9/08 to 7/26/08	
Late charges per Complaint	<u>280.74</u>
From 2/9/08 to 7/26/08	
TOTAL	<u>\$152,168.12</u>

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

UDREN LAW OFFICES, P.C.

BY: Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

DAMAGES ARE HEREBY ASSESSED AS INDICATED

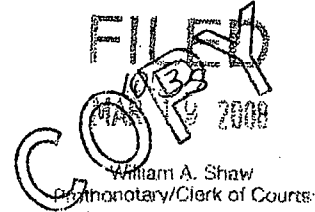
DATE: July 30, 2008

William A. Shaw
PRO PROTHY

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com



The CIT Group/Consumer Finance,
Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821
Defendant(s)

NO. 08-493CD

COMPLAINT IN MORTGAGE FORECLOSURE

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.

LAWYERS REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982

COPY

0820176 1/40

Verbal Confirmation of Service of Complaint

Date: 4/2/08

Spoke with: Marilynn

Defendant(s): Tuesday Passmore was served on _____

at: prop vacant
no sic made @ the mailing

Defendant(s): Leo Coble was served on 4/1/08

at: 933 Old Turnpike Road
Airport, PA 16821

Defendant(s): _____ was served on _____

at: _____

Are there any additional fees due?

Yes

No

If so how much? \$ _____

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 103913
NO: 08-493-CD
SERVICE # 4 OF 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: THE CIT GROUP/Consumer Finance Inc.
vs.
DEFENDANT: TUESDAY L. PASSMORE and LEO W. COBLE

SHERIFF RETURN

NOW, April 01, 2008 AT 11:33 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON LEO W. COBLE DEFENDANT AT 933 OLD TURNPIKE ROAD, ALLPORT, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RUTH COBLE, MOTHER 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 # 103913
NO: 08-493-CD
SERVICE # 2 OF 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: THE CIT GROUP/Consumer Finance Inc.
vs.
DEFENDANT: TUESDAY L. PASSMORE and LEO W. COBLE

SHERIFF RETURN

NOW, April 01, 2008 AT 11:33 AM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON LEO W. COBLE DEFENDANT AT 933 OLD TURNPIKE ROAD, ALLPORT, CLEARFIELD COUNTY, PENNSYLVANIA, BY HANDING TO RUTH COBLE, MOTHER A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT IN MORTGAGE FORECLOSURE AND MADE KNOWN THE CONTENTS THEREOF.

374 PIFER ROAD, CLEARFIELD, PA. "VACANT"

SERVED BY: HUNTER / DEHAVEN

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 3 of 4 Services

Sheriff Docket # **103913**

THE CIT GROUP/Consumer Finance Inc.

Case # 08-493-CD

vs.

TUESDAY L. PASSMORE and LEO W. COBLE

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW July 07, 2008 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO TUESDAY L. PASSMORE, DEFENDANT. WHEREABOUTS UNKNOWN.

SERVED BY: /

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 4 Services

Sheriff Docket # **103913**

THE CIT GROUP/Consumer Finance Inc.

Case # 08-493-CD

vs.

TUESDAY L. PASSMORE and LEO W. COBLE

COPY

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW July 07, 2008 AFTER DILIGENT SEARCH IN MY BAILIWICK I RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT FOUND" AS TO TUESDAY L. PASSMORE, DEFENDANT. WHEREABOUTS UNKNOWN.

374 PIFER ROAD, CLEARFIELD, PA. "VACANT".

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-493-CD

THE CIT GROUP/CONSUMER FINANCE INC.

vs

SERVICE # 1 OF 1

TUESDAY L. PASSMORE and LEO W. COBLE

COMPLAINT IN MORTGAGE FORECLOSURE & ORDER

SERVE BY: 07/05/2008

HEARING:

PAGE: 104252

COPY

DEFENDANT: TUESDAY L. PASSMORE

ADDRESS: 374 PIFER ROAD
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH POST ON PROPERTY

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE & ORDER ON TUESDAY L. PASSMORE, DEFENDANT

BY HANDING TO _____ / _____

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED _____

NOW 6/10/08 AT 156 AM / PM **POSTED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE & ORDER FOR TUESDAY L. PASSMORE

AT (ADDRESS) 374 Pifer rd Clearfield Pa

NOW _____ AT _____ AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO TUESDAY L. PASSMORE

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy S. Hunter
Deputy Signature

S. Hunter
Print Deputy Name

UDREN LAW OFFICES, P.C.

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003
856-669-5400
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer Finance, Inc.
Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

TO: Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

DATE of Notice: July 15, 2008

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYER REFERRAL SERVICE
David S. Meholic
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, ext. 5982

NOTIFICACION IMPORTANTE

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUIRIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO INMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL
LAWYER REFERRAL SERVICE
David S. Meholic
Court Administrator
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Clearfield, PA 16830
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NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS
DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY
INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

Chandra Arkema

Mark J. Udren, Esquire
Stuart Winneg, Esquire
Lorraine Doyle, Esquire
Alan M. Minato, Esquire
Chandra M. Arkema, Esquire
Louis A. Simoni, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, New Jersey 08003-3620

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
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pleadings@udren.com

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer Finance, Inc.
Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

TO: Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821

DATE of Notice: July 15, 2008

IMPORTANT NOTICE

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Court Administrator
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Cherry Hill, New Jersey 08003-3620

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
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ALAN M. MINATO, ESQUIRE - ID #75860
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WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003
856-669-5400
pleadings@udren.com

The CIT Group/Consumer Finance, Inc.
Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

TO: Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821

DATE of Notice: July 15, 2008

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UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

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CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

The CIT Group/Consumer
Finance, Inc.

Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-493-CD

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF NEW JERSEY

:

SS

COUNTY OF CAMDEN

:

THE UNDERSIGNED being duly sworn, deposes and says that the averments herein are based upon investigations made and records maintained by us either as Plaintiff or as servicing agent of the Plaintiff herein and that the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Servicemembers' Civil Relief Act (108 P.L. 189; 117 Stat. 2835; 2003 Enacted H.R. 100), and that the age and last known residence and employment of each Defendant are as follows:

Defendant: Tuesday L. Passmore
Age: Over 18
Residence: As captioned above
Employment: Unknown

Defendant: Leo W. Coble
Age: Over 18
Residence: As captioned above
Employment: Unknown

Chandra Arkema

Name:

Title: ATTORNEY FOR PLAINTIFF

Company: UDREN LAW OFFICES, P.C.

Sworn to and subscribed
before me this 26th day
of July, 2008.

Francine S. Necowitz
Notary Public

Francine S. Necowitz

Notary Public

State of New Jersey

My Commission Expires 12/20/08

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
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111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

COPY

The CIT Group/Consumer
Finance, Inc.

Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-493-CD

TO: Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Will [Signature]
Prothonotary

7/30/08

- ☒ Judgment by Default
- ☐ Money Judgment
- ☐ Judgment in Replevin
- ☐ Judgment for Possession
- ☐ Judgment on Award of Arbitration
- ☐ Judgment on Verdict
- ☐ Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-669-5400.

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
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WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

COPY

The CIT Group/Consumer
Finance, Inc.

Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-493-CD

TO: Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

NOTICE

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

- ☒ Judgment by Default
☐ Money Judgment
☐ Judgment in Replevin
☐ Judgment for Possession
☐ Judgment on Award of Arbitration
☐ Judgment on Verdict
☐ Judgment on Court Findings

Prothonotary

[Signature] 7/30/08
Btt

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ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-669-5400

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
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ATTORNEY FOR PLAINTIFF

COPY

The CIT Group/Consumer
Finance, Inc.

Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-493-CD

TO: Leo W. Coble
933 Old Turnpike Road
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ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-669-5400

[Signature] 7/30/08
69

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

COPY

CIT Group/Consumer Finance, Inc.
Plaintiff(s)

No.: 2008-00493-CD

Real Debt: \$152,168.12

Atty's Comm: \$

Costs: \$

Int. From: \$

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: July 30, 2008

Expires: July 30, 2013

Vs.

Tuesday L. Passmore
Leo W. Coble
Defendant(s)

Certified from the record this 30th day of July, 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

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
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WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

The CIT Group/Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821
Defendant(s)

PRAECIPE TO FILE PROOF OF SERVICE

TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to
the captioned matter.

Date: September 17, 2008

UDREN LAW OFFICES, P.C.

BY: *Mark J. Udren*
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

FILED

m 11:10 a.m. GK

OCT 01 2008

No cc

William A. Shaw
Prothonotary/Clerk of Courts

(GK)

The CIT Group/Consumer Finance, Inc., et. al., Plaintiff(s)
vs.
Tuesday L. Passmore, et. al., Defendant(s)



Service of Process by

Service of Process by

APS International, Ltd.

1-800-328-7171

APS International Plaza
7800 Glenroy Rd.
Minneapolis, MN 55439

APS File #: 091517-0001

AFFIDAVIT OF SERVICE -- Individual

UDREN LAW OFFICES
Ms. Amber Sandor
111 Woodcrest Rd, Ste 200
Cherry Hill, NJ 08003-3620

Service of Process on:

--Tuesday L. Passmore
Court Case No. 08-493-CD

State of: PA ss.

County of: BLAIR

Name of Server: D.M. ELLIS, undersigned, being duly sworn, deposes and says
that at the time of service, s/he was of legal age and was not a party to this action;

Date/Time of Service: that on the 22nd day of August, 20 08, at 12:41 o'clock PM

Place of Service: at 374 Pifer Road, in Clearfield, PA 16830

Documents Served: the undersigned served the documents described as:
Notice of Sheriff's Sale of Real Property w/ Order

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:
Tuesday L. Passmore BY POSTING

Person Served, and
Method of Service:

- ☐ By personally delivering them into the hands of the person to be served.
- ☐ By delivering them into the hands of _____, a person
of suitable age, who verified, or who upon questioning stated, that he/she resides with
Tuesday L. Passmore
at the place of service, and whose relationship to the person is: _____

Description of Person The person receiving documents is described as follows:

Receiving Documents: Sex ____; Skin Color ____; Hair Color ____; Facial Hair ____
Approx. Age ____; Approx. Height ____; Approx. Weight ____

- ☐ To the best of my knowledge and belief, said person was not engaged in the US Military at
the time of service.

Signature of Server: Undersigned declares under penalty of perjury
that the foregoing is true and correct.

D.M. Ellis
Signature of Server

APS International, Ltd.

Subscribed and sworn to before me this

25th day of August, 20 08

Marilyn A. Campbell
Notary Public (Commission Expires)

12-6-11

COMMONWEALTH OF PENNSYLVANIA

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

Member, Pennsylvania Association of Notaries

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

THE CIT GROUP/CONSUMER FINANCE, INC.
Plaintiff

vs.

TUESDAY L. PASSMORE
LEO W. COBLE

Defendants

NO. 08-493-CD

ORDER

NOW, this 2nd day of May, 2008, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon the Defendant **TUESDAY L. PASSMORE** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821;
3. By certified mail, return receipt requested, to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821; and
4. By posting the mortgaged premises known in this herein action as 374 Pifer Road, Clearfield, PA 16830.

Service of the aforementioned publication and mailings is effective upon the date of publication and mailing and is to be done by Plaintiff's attorney, who will file Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,

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

/s/ Fredric J. Ammerman

FREDRIC J. AMMERMAN
President Judge

MAY 28 2008

Attest.


Prothonotary/
Clerk of Courts

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

The CIT Group/Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821
Defendant(s)

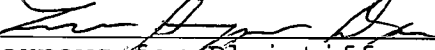
PRAECIPE TO FILE PROOF OF PUBLICATION

TO THE PROTHONOTARY:

Kindly file the attached Proof of Publication with regard to
the captioned matter.

DATE: September 17, 2008

UDREN LAW OFFICES, P.C.

BY: 
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

FILED

M 11:27 a.m. 6/1

OCT 01 2008

NO CC

§ William A. Shaw
Prothonotary/Clerk of Courts



NOTICE OF ACTION
IN MORTGAGE FORECLOSURE
THE COURT
OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION LAW
08-493-CO

The CIT
Group/Consumer Finance, Inc.,
Plaintiff

vs.
Tuesday L. Passmore and
Leo W. Coole
DEFENDANTS

NOTICE OF
SHERIFF'S SALE
OF REAL PROPERTY
TO: Tuesday L. Passmore,
DEFENDANT
374 Hill Road
Clearfield, PA 16830

Your house (real estate) at 374 Hill Road, Clearfield, PA 16830 is scheduled to be sold at the Sheriff's Sale on October 2, 2008 at 10:00 a.m. in the Clearfield County Courthouse, 1 North Second Street, Suite 116, Clearfield, PA 16830, to enforce the court judgment of \$152,168.12, obtained by Plaintiff above (the mortgage) against you. If the sale is postponed, the property will be re-

listed for the Next Available Sale.

PROPERTY DESCRIPTION:
ALL that piece or parcel of land situate in Lawrence Township, Clearfield County, Pennsylvania, bounded and described as follows: BEGINNING at a point on the Mt. Joy Road, the corner of Mrs. John Butler, thence East 40.82 perches to post; thence South 56 perches to post; thence North 86 1/2 degrees East 66 perches to township road its several courses to the piece of beginning. Containing 18 acres and 75 perches, more or less.

BEING known as Parcel #123-407-000-00048.

EXCEPTING AND RESERVING therefrom a certain tract or lot of ground consisting of one (1) acre which was conveyed to the Mt. Joy Cemetery Association, a full description of which will more fully appear by a deed recorded in Deed Book 106 at Page 199.

ALSO EXCEPTING AND RESERVING all that certain parcel of land consisting of approximately 10 acres acquired by the Commonwealth of Pennsylvania for the construction of Route No. 1009, more popularly known as Interstate 80 Keystone Shortway. A description of the premises acquired by the Commonwealth of Pennsylvania appears on Sheets No. 5, 9, 10, 12 and 22 of the right-of-way plan for Route No. 1009, Section No. 29, Clearfield County, Pennsylvania, approved by the Governor of the Commonwealth of Pennsylvania on August 25, 1984.

ALSO EXCEPTING AND RESERVING all that certain parcel of land previously conveyed by the Grangers hereby deed dated June 8, 1971, and recorded in Deed Book 576 at Page 416, to Luther Ogden and Lee M. Larch and Esther C. Larch, as joint tenants, with the right of survivorship. Said parcel of land adjoins the east of the Mt. Joy Cemetery.

ALSO EXCEPTING AND RESERVING all the coal and coal rights as contained in the deed by Tamer Elizabeth Lutz to R.H. Thompson by a deed dated March 27, 1907, in Deed Book 166 at Page 108.

BEING the same premises which Lee M. Larch and Esther C. Larch, his wife, by deed dated July 15, 1971 and recorded July 19, 1971 in Clearfield County in Deed Book Volume 577, Page 150, granted and conveyed unto Nicholas Mayhew and Mica Mayhew, husband and wife, as tenants by the entirety.

NOTICE OF
OWNER'S RIGHTS

YOU MAY BE ABLE TO PREVENT THIS SHERIFF'S SALE. To prevent this Sheriff's Sale, you must take immediate action:

1. The sale will be canceled if you pay to the mortgagee the back payment, late charges, costs and reasonable attorney's fees. To find out how much you must pay, you may call (856) 669-5400.
2. You may be able to stop the sale by filing a petition asking the Court to settle or open the judgment, if the judgment was improperly entered. You may ask the Court to postpone the sale for good cause.
3. You may also be able to stop the sale through other legal proceedings. You may need an attorney to assert your rights. The sooner you contact one, the more chance you will have of stopping the sale. (See notice below on how to obtain an attorney.)

YOU MAY STILL BE ABLE TO SAVE YOUR PROPERTY AND YOUR OTHER RIGHTS, EVEN IF THE SHERIFF'S SALE DOES TAKE PLACE.

1. If the Sheriff's Sale is not stopped, your property will be sold to the highest bidder. You may find out the price bid by calling 856-669-5400.
2. You may be able to petition the Court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.
3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened, you may call 856-669-5400.
4. If the amount due from the Buyer is not paid to the Sheriff, you will remain the owner of the property as if the sale never happened.

5. You have the right to remain in the property until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.

6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money for your house will be filed by the Sheriff within 30 days after the sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after Schedule of Distribution is filed.

7. You may also have other rights and defenses, or ways of getting your home back, if you act immediately after the sale.

YOU SHOULD TAKE THIS MATTER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE LISTED BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERRAL SERVICE
David S. Moholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641 Ext. 5982

ASSOCIATION
OF LICENSED AGENTS
David S. Moholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641 Ext. 5982

ATTORNEY FOR PLAINTIFF
MARK J. UDREN
& ASSOCIATES
WOODCREST
CORPORATE CENTER
111 WOODCREST ROAD,
SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

8-30-14-b

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA : SS:

COUNTY OF CLEARFIELD

On this 4th day of September, A.D. 20 08, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Margaret E. Krebs, who being duly sworn according to law, deposes and says that she is the President of The Progressive Publishing Company, Inc., and Associate Publisher of The Progress, a daily newspaper published at Clearfield, in the County of Clearfield and State of Pennsylvania, and established April 5, 1913, and that the annexed is a true copy of a notice or advertisement published in said publication in

the regular issues of August 30, 2008.
And that the affiant is not interested in the subject matter of the notice or advertising, and that all of the allegations of this statement as to the time, place, and character of publication are true.

Margaret E. Krebs
Sworn and subscribed to before me the day and year aforesaid.

Charles J. Lalor
Notary Public
Clearfield, Pa.

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Charles J. Lalor, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires Oct. 31, 2011
Member, Pennsylvania Association of Notaries

AMERICAN NEWSPAPER PHOTOGRAPHIC SERVICE
COLUMBIA, MISSOURI 64108
TELEPHONE 333-1111
FACSIMILE 333-1111

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...a natural-remed
...a teaspoon of olive oil
...ate anal-gland contrac-
...and, in seven years, we
...return.
...when I notice sluggish
...immediate results. —
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...rtainly worth trying on
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...remarkable properties
...ad are good for animals'

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...to know what you think
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...My husband feels him
...communicate easily.
...usband had serious can-
...time when my husband
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...is perch and staring
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...me, the bird came back
...again.
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Press Writer
PARK, S.D. (AP) —
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for concern.

DEAR DR. FOX: In
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should they reoccur. I refe
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tion. I followed this advice
have yet to see the problem

I also give her probiotic
igestion or gas and get
S.R., Norfolk-Va.

DEAR S.R.: Many read
natural remedy that is ce
logs with chronic anal-gl
nd olive leaves have som
is powerful antioxidants at
outs and skin.

DEAR DR. FOX: I hav
ur newspaper for a long t
logs or cats. I would like
if pet birds, and if it's ur
develop a deep depression.

We have a large gray c
old. He's an amazing guy
erse and do a few tricks.
nd cleans his cage. They

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was absent, the bird beca
ating, just sitting on t
traight ahead. He would
nd seemed oblivious to a
s my husband returned he

life and was his old self
This bird seems rigid in

**NOTICE OF ACTION
IN MORTGAGE FORECLOSURE
IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW
08-493-CD**

The CIT Group/Consumer Finance, Inc.,
Plaintiff v. Tuesday L. Passmore and Leo W.
Coble DEFENDANTS.

**NOTICE OF SHERIFF'S SALE OF
REAL PROPERTY**

TO: Tuesday L. Passmore,
DEFENDANT, 374 Pifer Road, Clearfield,
PA 16830.

Your house (real estate) at 374 Pifer
Road, Clearfield, PA 16830 is scheduled to
be sold at the Sheriff's Sale on October 3,
2008, at 10:00 am in the Clearfield County
Courthouse, 1 North Second Street, Suite
116, Clearfield, PA 16830, to enforce the
court judgment of \$152,168.12, obtained by
Plaintiff above (the mortgagee) against you.
If the sale is postponed, the property will be
relisted for the Next Available Sale.

PROPERTY DESCRIPTION:

ALL that piece or parcel of land situate
in Lawrence Township, Clearfield County,
Pennsylvania, bounded and described as
follows:

BEGINNING at a point on the Mt. Joy
Road, the corner of Mrs. John Butler; thence
East 40.82 perches to post; thence South 56
perches to post; thence North 86 1/2
degrees East 66 perches to township road;
thence along said township road its several
courses to the place of beginning.
Containing 18 acres and 75 perches, more
or less.

BEING known as Parcel #123-K07-000-
00048.

EXCEPTING AND RESERVING
therefrom a certain tract or lot of ground
consisting of one (1) acre which was
conveyed to the Mt. Joy Cemetery

Association, a full description of which will
more fully appear by a deed recorded in
Deed Book 106 at Page 199.

ALSO EXCEPTING AND RESERVING
all that certain parcel of land consisting of
approximately 10 acres acquired by the
Commonwealth of Pennsylvania for the
construction of Route No. 1009, more
popularly known as Interstate 80 Keystone
Short-way. A description of the premises
acquired by the Commonwealth of
Pennsylvania appears on Sheets No. 8, 9,
10, 12 and 52 of the right-of-way plan for
Route No. 1009, Section No. 29, Clearfield
County, Pennsylvania, approved by the
Governor of the Commonwealth of
Pennsylvania on August 25, 1964.

EXCEPTING AND RESERVING all that
certain parcel of land previously conveyed
by the Grantors herein by deed dated June
8, 1971, and recorded in Deed Book 576 at
Page 416, to Luther Ogden and Lee M.
Lanich and Esther C. Lanich, as joint
tenants, with the right of survivorship. Said
parcel of land adjoins the land of the Mt. Joy
Cemetery.

ALSO EXCEPTING AND RESERVING
all the coal and coal rights as contained in
the deed by Tamer Elizabeth Lutz to R. H.
Thompson by a deed dated March 27, 1907,
in Deed Book 166 at Page 108.

BEING the same premises which Lee K.
Lanich and Esther C. Lanich, his wife, by
deed dated July 15, 1971 and recorded July
15, 1971 in Clearfield County in Deed Book
Volume 577, Page 150, granted and
conveyed unto Nicholas Mayhew and Hilda
Mayhew, husband and wife, as tenants by
the entireties.

NOTICE OF OWNER'S RIGHTS

**YOU MAY BE ABLE TO PREVENT
THIS SHERIFF'S SALE**

To prevent this Sheriff's Sale, you must
take immediate action:

1. The sale will be cancelled if you pay
to the mortgagee the back payment, late
charges, costs and reasonable attorney's
fees. To find out how much you must pay,
you may call: (856) 669-5400.

2. You may be able to stop the sale by
filing a petition asking the Court to strike or
open the judgment, if the judgment was
improperly entered. You may also ask the
Court to postpone the sale for good cause.

3. You may also be able to stop the sale
through other legal proceedings. You may
need an attorney to assert your rights. The
sooner you contact one, the more chance
you will have of stopping the sale. (See
notice below on how to obtain an Attorney.)

**YOU MAY STILL BE ABLE TO SAVE
YOUR PROPERTY AND YOU HAVE
OTHER RIGHTS EVEN IF THE SHERIFF'S
SALE DOES TAKE PLACE.**

1. If the Sheriff's Sale is not stopped, your property will be sold to the highest bidder. You may find out the price bid by calling 856-669-5400.

2. You may be able to petition the Court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.

3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened, you may call 856-659-5400.

4. If the amount due from the Buyer is not paid to the Sheriff, you will remain the owner of the property as if the sale never happened.

5. You have the right to remain in the property until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.

6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money bid for your house will be filed by the Sheriff within 30 days after the sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after Schedule of Distribution is filed.

7. You may also have other rights and defenses, or ways of getting your home back, if you act immediately after the sale.

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 LISTED BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERRAL SERVICE, David S. Meholick, Court Administrator, Clearfield County Courthouse, Clearfield, PA 16830, 814-765-2641, ext. 5982.

ASSOCIATION DE LICENCIADOS, David S. Meholick, Court Administrator, Clearfield County Courthouse, Clearfield, PA 16830, 814-765-2641, ext. 5982.

MARK J. UDREN, ATTORNEY FOR PLAINTIFF, MARK J. UDREN & ASSOCIATES, WOODCREST CORPORATE CENTER, 111 WOODCREST ROAD, SUITE 200, CHERRY HILL, NJ 08003-3620, 856-669-5400.

William J. Mansfield, Inc., Legal Advertising Agency, The Woods, 998 Old Eagle School Road, Suite 1209, Wayne, PA 19087.


PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

:

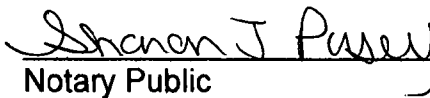
COUNTY OF CLEARFIELD :

On this 5th day of September AD 2008, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement published in said publication in the regular issues of Week of September 5, 2008, Vol. 20, No. 36. And that all of the allegations of this statement as to the time, place, and character of the publication are true.



Gary A. Knaresboro, Esquire
Editor

Sworn and subscribed to before me the day and year aforesaid.



Notary Public
My Commission Expires

NOTARIAL SEAL
SHARON J. PUSEY, Notary Public
Houtzdale, Clearfield County, PA
My Commission Expires, April 7, 2011

William J. Mansfield, Inc.
The Woods
998 Old Eagle School Rd Suite 1209
Wayne, PA 19087

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

THE CIT GROUP/CONSUMER FINANCE, INC.
Plaintiff

vs.

TUESDAY L. PASSMORE
LEO W. COBLE

Defendants

NO. 08-493-CD

ORDER

NOW, this 2nd day of May, 2008, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon the Defendant **TUESDAY L. PASSMORE** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821;
3. By certified mail, return receipt requested, to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821; and
4. By posting the mortgaged premises known in this herein action as 374 Pifer Road, Clearfield, PA 16830.

Service of the aforementioned publication and mailings is effective upon the date of publication and mailing and is to be done by Plaintiff's attorney, who will file Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,

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

/s/ Fredric J. Ammerman

FREDRIC J. AMMERMAN
President Judge

MAY 28 2008

Attest.


Prothonotary/
Clerk of Courts

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302

STUART WINNEG, ESQUIRE - ID #45362

LORRAINE DOYLE, ESQUIRE - ID #34576

ALAN M. MINATO, ESQUIRE - ID #75860

CHANDRA M. ARKEMA, ESQUIRE - ID #203437

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400 pleadings@udren.com

The CIT Group/Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821

NO. 08-493-CD

Defendant(s)

VERIFICATION OF SERVICE BY CERTIFIED MAIL AND
REGULAR MAIL PURSUANT TO COURT ORDER

The undersigned hereby verifies that he is counsel for Plaintiff in the above case and that pursuant to the Court order issued in this matter he mailed a true and correct copy of the Notice of Sale to Defendant(s), by certified mail and regular first class mail, to the last known address of Defendant(s) as follows:

DATE MAILED: August 19, 2008

Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821
AND
374 Pifer Road
Clearfield, PA 16830

I verify that the statements made herein are true and correct and I understand that false statements made herein are subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Dated: September 17, 2008

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

FILED

M 11:06 a.m. GK

OCT 01 2008

No CC

William A. Shaw
Prothonotary/Clerk of Courts



Name and Address Of Sender

UDREN LAW OFFICES, P.C.
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003

ATTN: Amber Sandor

☐ Registered
☐ Insured

☐ Return Receipt for Merchandise
☐ Init/Recorded Del.
☐ Express Mail

Check appropriate block for Registered Mail:
☐ With Postal Insurance
☐ Without postal insurance

Affix stamp here if issued as certificate of mailing or for additional copies of this bill.

Postmark and Date of Receipt

Line Article Number Name of Addressee, Street, and Post Office Address

Postage

Fee

Handling Charge

Act. Value (if Regis.)

Insured Value

Due Sender If COD

R.R. Fee

S.D. Fee

S.H. Fee

Rst. Del. Fee Remarks

1 Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821

2 Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

016H26519216

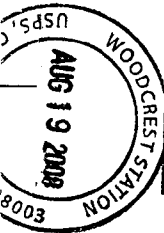
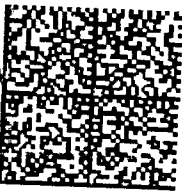
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08/19/2008

Mailed From 08003

US POSTAGE

16152H



Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge	Act. Value (if Regis.)	Insured Value	Due Sender If COD	R.R. Fee	S.D. Fee	S.H. Fee	Rst. Del. Fee	Remarks
1		Tuesday L. Passmore 933 Old Turnpike Road Allport, PA 16821											
2		Tuesday L. Passmore 374 Pifer Road Clearfield, PA 16830											
3													
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10													
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14													
15													
Total number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)										

The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to third and fourth class parcels.

PS Form 3877, February 1994

Form Must be Completed by Typewriter, Ink or Ball Point Pen

Tuesday L. Passmore
Leo W. Coble: #08020176 (Clearfield)

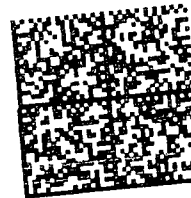
AW OFFICES, P.C.
CORPORATE CENTER
100 CRESCENT ROAD
MAY HILL, NJ 08003

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com ®	
OFFICIAL USE	
Postage	\$.42
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32
Postmark Here	
Sent To	Tuesday L. Passmore
Street, Apt. No., or PO Box No.	374 Pifer Road
City, State, ZIP+4	Clearfield, PA 16830
PS Form 3800, August 2006 See Reverse for Instructions	

7007 3020 0000 0873 8199
7007 3020 0000 0873 8199

CERTIFIED MAIL™

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE



Hasler

016H26519216
\$05.320
08/19/2008
Mailed From 08003
US POSTAGE

NOTICE OF SHERIFF'S SALE OF RE.

TO: Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

2. Article Number
(Transfer from service label)

7007 3020 0000 0873 8919

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

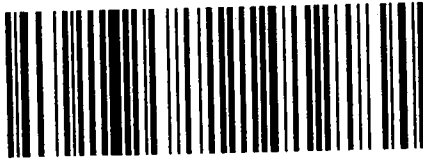
4. Restricted Delivery? (Extra Fee)

☐ Yes

A8

LAW OFFICES, P.C.
100 CORPORATE CENTER
WOODCREST ROAD
MIDRISTY HILL, NJ 08003

2068 8280 0000 0208 2002
2068 8280 0000 0208 2002



PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL™

TO: Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821

Your house (real estate) at 374 Pifer Road
is scheduled to be sold at the Sheriff's s

U.S. Postal Service™	
CERTIFIED MAIL™ RECEIPT	
<i>(Domestic Mail Only; No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$ 42
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32
Postmark Here	
Sent To	Tuesday L. Passmore
Street, Apt. No., or PO Box No.	933 Old Turnpike Road
City, State, Zip+4	Allport, PA 16821
PS Form 3800, August 2006 See Reverse for Instructions	



Hasler

016H26519216
\$05.320
08/19/2008
Mailed From 08003
US POSTAGE

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery."
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821

2. Article Number
(Transfer from service label)

7007 3020 0000 0873 8902

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

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

THE CIT GROUP/CONSUMER FINANCE, INC.
Plaintiff

vs.

TUESDAY L. PASSMORE
LEO W. COBLE

Defendants

NO. 08-493-CD

ORDER

NOW, this 2nd day of May, 2008, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon the Defendant **TUESDAY L. PASSMORE** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821;
3. By certified mail, return receipt requested, to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821; and
4. By posting the mortgaged premises known in this herein action as 374 Pifer Road, Clearfield, PA 16830.

Service of the aforementioned publication and mailings is effective upon the date of publication and mailing and is to be done by Plaintiff's attorney, who will file Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,

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

/s/ Fredric J. Ammerman

FREDRIC J. AMMERMAN
President Judge

MAY 28 2008

Attest.


Prothonotary/
Clerk of Court

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

FILED
m 10:22 AM
OCT 08 2008
(67)

The CIT Group/Consumer Finance,
Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

William A. Shaw
Prothonotary/Clerk of Courts

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821
Defendant(s)

NO. 08-493-CD

AFFIDAVIT OF SERVICE PURSUANT TO Pa.R.C.P. RULE 3129.1

Plaintiff, by its/his/her Attorney hereby verifies that:


1. A copy of the Notice of Sheriff's Sale, a true and correct copy of which is attached hereto as Exhibit "A", was sent to every recorded lienholder and every other interested party known as of the date of the filing of the Praecipe for the Writ of Execution, on the date(s) appearing on the attached Certificates of Mailing.
2. A Notice of Sheriff's Sale was sent to Defendant(s) by regular mail and certified mail on the date appearing on the attached Return Receipt, which was signed for by Defendant(s) on the date specified on the said Return Receipt. Copies of the said Notice and Return Receipt are attached hereto as Exhibit "B".
3. If a Return Receipt is not attached hereto, then service was by personal service on the date specified on the attached Return of Service, attached hereto as Exhibit "B".
4. If service was by Order of Court, then proof of compliance with said Order is attached hereto as Exhibit "B".

All Notices were served within the time limits set forth by Pa Rule C.P. 3129.

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

Dated: October 3, 2008

UDREN LAW OFFICES, P.C.

BY: 
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302

STUART WINNEG, ESQUIRE - ID #45362

LORRAINE DOYLE, ESQUIRE - ID #34576

ALAN M. MINATO, ESQUIRE - ID #75860

CHANDRA M. ARKEMA, ESQUIRE - ID #203437

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400

pleadings@udren.com

The CIT Group/Consumer
Finance, Inc.

Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

NO. 08-493-CD

AMENDED AFFIDAVIT PURSUANT TO RULE 3129.1

The CIT Group/Consumer Finance, Inc., Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at: 374 Pifer Road, Clearfield, PA 16830

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

Name

Address

Tuesday L. Passmore

933 Old Turnpike Road
Allport, PA 16821

374 Pifer Road
Clearfield, PA 16830

Leo W. Coble

933 Old Turnpike Road
Allport, PA 16821

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

Name

Address

SAME AS #1 ABOVE

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

Name

Address

Eugene Shadeck

1600 Potter St.
Karthaus, PA 16845

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

Name

Address

The CIT Group/Consumer
Finance, Inc.

715 South Metropolitan Avenue
Suite 150, Oklahoma City, OK 73108

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

Name	Address
------	---------

None

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

Name	Address
------	---------

Real Estate Tax Dept.	1 North Second St., Ste. 116, Clearfield, PA 16830
-----------------------	--

Domestic Relations Section	1 North Second St., Ste. 116, Clearfield, PA 16830
----------------------------	--

Commonwealth of PA, Department of Revenue	Bureau of Compliance, PO Box 281230 Harrisburg, PA 17128-1230
--	--

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:

Name	Address
------	---------

Tenants/Occupants	374 Pifer Road Clearfield, PA 16830
-------------------	--

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. sec. 4904 relating to unsworn falsification to authorities.

DATED: October 3, 2008

UDREN LAW OFFICES, P.C.

BY Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302

STUART WINNEG, ESQUIRE - ID #45362

LORRAINE DOYLE, ESQUIRE - ID #34576

ALAN M. MINATO, ESQUIRE - ID #75860

CHANDRA M. ARKEMA, ESQUIRE - ID #203437

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400

The CIT Group/Consumer Finance, Inc.
Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

**NOTICE OF SHERIFF'S SALE
OF REAL PROPERTY**

**OWNER(S): Tuesday L. Passmore
Leo W. Coble**

**PROPERTY: 374 Pifer Road
(Lawrence Township)
Clearfield, PA 16830**

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the Clearfield County Sheriff's Sale on October 3, 2008, at 10: 00 am, in the Clearfield County Courthouse, 1 North Second Street, Suite 116, Clearfield, PA 16830. Our records indicate that you may hold a mortgage or judgment on the property which will be extinguished by the sale. You may wish to attend the sale to protect your interests.

A Schedule of Distribution will be filed by the Sheriff on a date specified by the Sheriff not later than 30 days after sale. Distribution will be made in accordance with the schedule unless exceptions are filed thereto within 10 days after the filing of the schedule.

EXHIBIT A

Name and Address of Sender
 UDREN LAW OFFICES, P.C.
 111 WOODCREST ROAD, SUITE 200
 CHERRY HILL, NJ 08003

ATTN: Amber D. Sandor

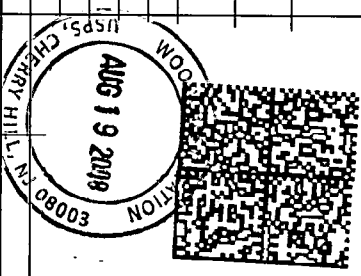
☐ Registered
☐ Insured
☐ COD
☐ Certified

☐ Return Receipt for Merchandise
☐ Int'l Recorded Del.
☐ Express Mail

Check appropriate block for Registered Mail:
☐ With Postal Insurance
☐ Without postal insurance

Affix stamp here if issued as certificate of mailing or for additional copies of this bill.
 Postmark and Date of Receipt

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge	Act. Value (if Regis.)	Insured Value	Due Sender If COD	R.R. Fee	S.D. Fee	S.H. Fee	Rst. Del. Fee
1		COMMONWEALTH OF PA. DEPT. OF REVENUE, BUREAU OF COMPLIANCE PO Box 281230, Department of Revenue Harrisburg, PA 17128-1230										
2		TENANTS/OCCUPANTS 374 Pifer Road (Lawrence Township) Clearfield, PA 16830										
3		EUGENE SHADECK 1600 Potter Street Karthaus, PA 16845										
4		THE CIT GROUP/CONSUMER FINANCE 715 South Metropolitan Avenue, Suite 150 Oklahoma City, OK 73108										
5		REAL ESTATE TAX DEPARTMENT 1 North Second Street, Suite 116 Clearfield, PA 16830										
6		DOMESTIC RELATIONS SECTION 1 North Second Street, Suite 116 Clearfield, PA 16830										
7												
8												
9												
10												
11												
12												
13												
14												
15												
Total number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)									



The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to third and forth class parcels.

PS Form 3877, February 1994

Form Must be Completed by Typewriter, Ink or Ball Point Pen

Tuesday L. Passmore
 Leo W. Coble, #08020176 (Clearfield) 10/3/08

EXHIBIT

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

v.
Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821
Defendant(s)

PRAECIPE TO FILE PROOF OF SERVICE

TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to
the captioned matter.

Date: September 17, 2008

UDREN LAW OFFICES, P.C.

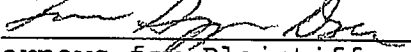
BY: 
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

EXHIBIT B

The CIT Group/Consumer Finance, Inc., et. al., Plaintiff(s)
vs.
Tuesday L. Passmore, et. al., Defendant(s)



Service of Process by
APS International, Ltd.
1-800-328-7171

APS International Plaza
7800 Glenroy Rd.
Minneapolis, MN 55439-
4444

APS File #: 091517-0001

AFFIDAVIT OF SERVICE -- Individual

UDREN LAW OFFICES
Ms. Amber Sandor
111 Woodcrest Rd, Ste 200
Cherry Hill, NJ 08003-3620

Service of Process on:

--Tuesday L. Passmore
Court Case No. 08-493-CD

State of: PA) ss.

County of: BLAIR)

Name of Server: D.M. ELLIS, undersigned, being duly sworn, deposes and says
that at the time of service, s/he was of legal age and was not a party to this action;

Date/Time of Service: that on the 22ND day of AUGUST, 20 08, at 12:41 o'clock P M

Place of Service: at 374 Pifer Road, in Clearfield, PA 16830

Documents Served: the undersigned served the documents described as:
Notice of Sheriff's Sale of Real Property w/ Order

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:

Tuesday L. Passmore BY POSTING

Person Served, and
Method of Service:

- ☐ By-personally delivering them into the hands of the person to be served.
☐ By delivering them into the hands of _____, a person
of suitable age, who verified, or who upon questioning stated, that he/she resides with
Tuesday L. Passmore
at the place of service, and whose relationship to the person is: _____

Description of Person
Receiving Documents: The person receiving documents is described as follows:

Sex ____; Skin Color ____; Hair Color ____; Facial Hair ____
Approx. Age ____; Approx. Height ____; Approx. Weight ____

- ☐ To the best of my knowledge and belief, said person was not engaged in the US Military at
the time of service.

Signature of Server: Undersigned declares under penalty of perjury
that the foregoing is true and correct.

D.M. Ellis
Signature of Server

APS International, Ltd.

Subscribed and sworn to before me this

25th day of AUGUST, 20 08

Marilyn A. Campbell
Notary Public (Commission Expires)

12-6-11

COMMONWEALTH OF PENNSYLVANIA

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

Member, Pennsylvania Association of Notaries

EXHIBIT B

The CIT Group/Consumer Finance, Inc., et. al., Plaintiff(s)
vs.
Tuesday L. Passmore, et. al., Defendant(s)



Service of Process by
APS International, Ltd.
1-800-328-7171

APS International Plaza
7800 Glenroy Rd.
Minneapolis, MN 55425

APS File #: 091517-0002

AFFIDAVIT OF SERVICE -- Individual

UDREN LAW OFFICES
Ms. Amber Sandor
111 Woodcrest Rd, Ste 200
Cherry Hill, NJ 08003-3620

Service of Process on:

--Leo W. Coble
Court Case No. 08-493-CD

State of: PA ss.

County of: BLAIR

Name of Server: D.M. ELLIS, undersigned, being duly sworn, deposes and says
that at the time of service, s/he was of legal age and was not a party to this action;

Date/Time of Service: that on the 1st day of September, 20 08, at 10:05 o'clock AM

Place of Service: at 933 Old Turnpike Road, in Altoona, PA 16821

Documents Served: the undersigned served the documents described as:
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:
Leo W. Coble

Person Served, and
Method of Service:

☒ By personally delivering them into the hands of the person to be served.

☐ By delivering them into the hands of _____,
of _____ age, _____ years of age, _____ who verified, on _____ upon questioning stated, that he/she resides with
_____ at the place of service, and whose relationship to the person is: _____

Description of Person
Receiving Documents:

The person receiving documents is described as follows:

Sex M; Skin Color Cauc; Hair Color Brown; Facial Hair STUBBY
Approx. Age 35; Approx. Height 5'7"; Weight 260

To the best of my knowledge and belief, said person was not engaged in the US Military at
the time of service.

Signature of Server: Undersigned declares under penalty of perjury
that the foregoing is true and correct.

Subscribed and sworn to before me this

2nd day of SEPTEMBER, 20 08

DMEllis
Signature of Server

Marilyn A. Campbell
Notary Public (Commission Expires) 12-6-11

APS International, Ltd.

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

EXHIBIT B

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400 pleadings@udren.com

The CIT Group/Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821

NO. 08-493-CD

Defendant(s)

VERIFICATION OF SERVICE BY CERTIFIED MAIL AND
REGULAR MAIL PURSUANT TO COURT ORDER

The undersigned hereby verifies that he is counsel for Plaintiff in the above case and that pursuant to the Court order issued in this matter he mailed a true and correct copy of the Notice of Sale to Defendant(s), by certified mail and regular first class mail, to the last known address of Defendant(s) as follows:

DATE MAILED: August 19, 2008

Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821
AND
374 Pifer Road
Clearfield, PA 16830

I verify that the statements made herein are true and correct and I understand that false statements made herein are subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

Dated: September 17, 2008

UDREN LAW OFFICES, P.C.

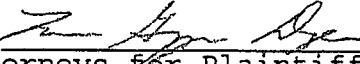
BY: 
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

EXHIBIT B

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

THE CIT GROUP/CONSUMER FINANCE, INC.
Plaintiff

vs.

TUESDAY L. PASSMORE
LEO W. COBLE

Defendants

NO. 08-493-CD

ORDER

NOW, this 2nd day of May, 2008, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon the Defendant **TUESDAY L. PASSMORE** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821;
3. By certified mail, return receipt requested, to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821; and
4. By posting the mortgaged premises known in this herein action as 374 Pifer Road, Clearfield, PA 16830.

Service of the aforementioned publication and mailings is effective upon the date of publication and mailing and is to be done by Plaintiff's attorney, who will file Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,

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

/s/ Fredric J. Ammerman

FREDRIC J. AMMERMAN
President Judge

MAY 28 2008

Attest.



Prothonotary/
Clerk of Courts

EXHIBIT B

Name and Address Of Sender UDREN LAW OFFICES, P.C. 111 WOODCREST ROAD, SUITE 200 CHERRY HILL, NJ 08003 ATTN: Amber Sandor		<input type="checkbox"/> Registered <input type="checkbox"/> Insured <input type="checkbox"/> COD <input type="checkbox"/> Certified		<input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Int'l Recorded Del. <input type="checkbox"/> Express Mail		Check appropriate block for Registered Mail: <input type="checkbox"/> With Postal Insurance <input type="checkbox"/> Without postal Insurance		Affix stamp here if issued as certificate of mailing or for additional copies of this bill.					
Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge	Act. Value (If Regis.)	Insured Value	Due Sender If COD	R.R. Fee	S.D. Fee	S.H. Fee	Reg. Del. Fee	Remarks
1		Tuesday L. Passmore 933 Old Turnpike Road Allport, PA 16821											
2		Tuesday L. Passmore 374 Pifer Road Clearfield, PA 16830											
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													
Total number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office		Postmaster, Per (Name of Receiving Employee)		The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to third and fourth class parcels.							

016H26519216
 \$02.200
 08/19/2008
 Mailed From 08003
 US POSTAGE

16821

EXHIBIT

PS Form 3877, February 1994

Form Must be Completed by Typewriter, Ink or Ball Point Pen

Tuesday L. Passmore
 Leo W. Coble, #08020176 (Clearfield)

AW OFFICES, P.C.
CORPORATE CENTER
ODCREST ROAD
Y HILL, NJ 08003

U.S. Postal ServiceTM
CERTIFIED MAIL[®] RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$.48
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.38

Postmark
Here

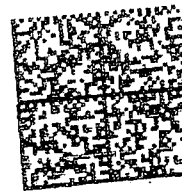
Sent To
Street, Apt. No.,
or PO Box No.
City, State, ZIP+4

Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

PST Form 3800, August 2006 See Reverse for Instructions

9768 8280 0000 0208 2007
9768 8280 0000 0208 2007

CERTIFIED MAIL[®]
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE



016H26519216
\$05.320
08/19/2008
Mailed From 08003
US POSTAGE

NOTICE OF SHERIFF'S SALE OF RE.

TO: Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

EXHIBIT B

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpieces "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Tuesday L. Passmore
374 Pifer Road
Clearfield, PA 16830

2. Article Number
(Transfer from service label)

7007 3020 0000 0873 8919

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

A8

EXHIBIT B

LAW OFFICES, P.C.
 T CORPORATE CENTER
 DODCREST ROAD
 RY HILL, NJ 08003

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

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

OFFICIAL USE

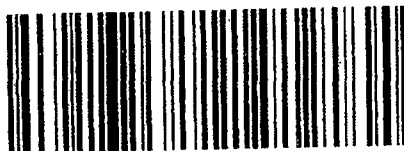
Postage	\$ 42	Postmark Here
Certified Fee	2.70	
Return Receipt Fee (Endorsement Required)	2.20	
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$ 5.32	

Sent To
 Street, Apt. No.,
 or PO Box No.
 City, State, ZIP+4

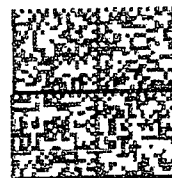
Tuesday L. Passmore
 933 Old Turnpike Road
 Allport, PA 16821

PS Form 3800, August 2006 See Reverse for Instructions

2007 3020 0000 020E 7002
 2007 3020 0000 020E 7002



CERTIFIED MAILTM
 PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
 OF THE RETURN ADDRESS, FOLD AT DOTTED LINE



016H26519216
\$05.320
 08/19/2008
 Mailed From 08003
US POSTAGE

TO: Tuesday L. Passmore
 933 Old Turnpike Road
 Allport, PA 16821

Your house (real estate) at 374 Pifer Road
 is scheduled to be sold at the Sheriff's s

EXHIBIT B

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Revised) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Tuesday L. Passmore
933 Old Turnpike Road
Allport, PA 16821

2. Article Number
(Transfer from service label)

7007 3020 0000 0873 8902

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☒ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

EXHIBIT B

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

The CIT Group/Consumer
Finance, Inc.
715 South Metropolitan Avenue
Suite 150
Oklahoma City, OK 73108
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 08-493-CD

v.

Tuesday L. Passmore
Leo W. Coble
933 Old Turnpike Road
Allport, PA 16821
Defendant(s)

PRAECIPE TO FILE PROOF OF PUBLICATION

TO THE PROTHONOTARY:

Kindly file the attached Proof of Publication with regard to
the captioned matter.

DATE: September 17, 2008

UDREN LAW OFFICES, P.C.


BY: 
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

EXHIBIT B

NOTICE OF ACTION
IN MORTGAGE FORECLOSURE
IN THE COURT
OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL ACTION LAW
08-493-CD

The CIT
Group/Consumer Finance, Inc.
Plaintiff

Tuesday L. Passmore and
Leo W. Coble
DEFENDANTS

NOTICE OF
SHERIFF'S SALE
OF REAL PROPERTY
TO Tuesday L. Passmore,
DEFENDANT

374 Pifer Road
Clearfield, PA 16830
Your house (real estate) at 374 Pi-
fer Road, Clearfield, PA 16830 is
scheduled to be sold at the
Sheriff's Sale on October 3, 2008,
at 10:00 a.m. in the Clearfield
County Courthouse, 1 North Sec-
ond Street, Suite 116, Clearfield,
PA 16830, to enforce the court
judgment of \$152,768.42, ob-
tained by Plaintiff above (the mort-
gage) against you. If the sale is
postponed, the property will be re-

listed for the Next Available Sale.

PROPERTY DESCRIPTION:
All that piece or parcel of land sit-
uate in Lawrence Township, Clear-
field County, Pennsylvania,
bounded and described as follows:
BEGINNING at a point on the Mt.
Joy Road, the corner of Mrs. John
Butler, thence East 40.82 perches
to post; thence South 56 perches
to post; thence North 86 1/2 de-
grees East 66 perches to township
road; thence along said township
road its several courses to the
place of beginning. Containing 18
acres and 75 perches, more or
less.

BEING known as Parcel
#123-K07-000-00048.

EXCEPTING AND RESERVING
therefrom a certain tract or lot of
ground consisting of one (1) acre
which was conveyed to the Mt. Joy
Cemetery Association, a full de-
scription of which will more fully ap-
pear by a deed recorded in Deed
Book 106 at Page 199.

ALSO EXCEPTING AND RESER-
VING all that certain parcel of land
consisting of approximately 10
acres acquired by the Common-
wealth of Pennsylvania for the con-
struction of Route No. 1009, more
popularly known as Interstate 80
Keystone Shortway. A description
of the premises acquired by the
Commonwealth of Pennsylvania
appears on Sheets No. 8, 9, 10, 12
and 52 of the right-of-way plan for
Route No. 1009, Section No. 29,
Clearfield County, Pennsylvania,
approved by the Governor of the
Commonwealth of Pennsylvania on
August 25, 1964.

ALSO EXCEPTING AND RESER-
VING all that certain parcel of land
previously conveyed by the Grant-
ors herein by deed dated June 8,
1971, and recorded in Deed Book
576 at Page 416, to Luther Ogden
and Lee M. Lanich and Esther C.
Lanich, as joint tenants, with the
right of survivorship. Said parcel of
land adjoins the land of the Mt. Joy
Cemetery.

ALSO EXCEPTING AND RESER-
VING all the coal and coal rights as
contained in the deed by Tamer
Elizabeth Lutz to R.H. Thompson
by a deed dated March 27, 1907,
in Deed Book 166 at Page 108.

BEING the same premises which
Lee M. Lanich and Esther C. La-

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :
COUNTY OF CLEARFIELD : SS:

On this 4th day of September, A.D. 20 08,
before me, the subscriber, a Notary Public in and for said County and
State, personally appeared Margaret E. Krebs, who being duly sworn
according to law, deposes and says that she is the President of The
Progressive Publishing Company, Inc., and Associate Publisher of The
Progress, a daily newspaper published at Clearfield, in the County of
Clearfield and State of Pennsylvania, and established April 5, 1913, and
that the annexed is a true copy of a notice or advertisement published in
said publication in

the regular issues of August 30, 2008

And that the affiant is not interested in the subject matter of the notice or
advertising, and that all of the allegations of this statement as to the time,
place, and character of publication are true.

Margaret E. Krebs
Sworn and subscribed to before me the day and year aforesaid.

Cheryl J. Robison
Notary Public Clearfield, Pa.

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Cheryl J. Robison, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires Oct. 31, 2011
Member, Pennsylvania Association of Notaries

EXHIBIT B

Lee M. Lamon and Lester C. Lamon, his wife, by deed dated July 15, 1971 and recorded July 15, 1971 in Clearfield County in Deed Book Volume 577, Page 150, granted and conveyed unto Nicholas Mayhew and Hilda Mayhew, husband and wife, as tenants by the entireties.

**NOTICE OF
OWNER'S RIGHTS
YOU MAY BE ABLE TO
PREVENT THIS SHERIFF'S SALE**
To prevent this Sheriff's Sale, you must take immediate action:

1. The sale will be cancelled if you pay to the mortgagee the back payment, late charges, costs and reasonable attorney's fees. To find out how much you must pay, you may call: (856) 669-5400.

2. You may be able to stop the sale by filing a petition asking the Court to strike or open the judgment, if the judgment was improperly entered. You may also ask the Court to postpone the sale for good cause.

3. You may also be able to stop the sale through other legal proceedings. You may need an attorney to assert your rights. The sooner you contact one, the more chance you will have of stopping the sale. (See notice below on how to obtain an Attorney.)

**YOU MAY STILL BE ABLE TO
SAVE YOUR PROPERTY AND
YOU OTHER RIGHTS EVEN IF
THE SHERIFF'S SALE DOES TAKE
PLACE.**

1. If the Sheriff's Sale is not stopped, your property will be sold to the highest bidder. You may find out the price bid by calling 856-669-5400.

2. You may be able to petition the Court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.

3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened, you may call 856-669-5400.

4. If the amount due from the Buyer is not paid to the Sheriff, you will remain the owner of the property as if the sale never happened.

5. You have the right to remain in the property until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.

6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money bid for your house will be filed by the Sheriff within 30 days after the sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after Schedule of Distribution is filed.

7. You may also have other rights and defenses, or ways of getting your home back, if you act immediately after the sale.

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 LISTED BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, Ext. 5982

EXHIBIT

Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, Ext. 5982
ASSOCIATION
DE LICENCIADOS
David S. Mehoick
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
814-765-2641, Ext. 5982
MARK J. UDREN
ATTORNEY FOR PLAINTIFF
MARK J. UDREN
& ASSOCIATES
WOODCREST
CORPORATE CENTER
111 WOODCREST ROAD,
SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
8-30-10 b

EXHIBIT B

**NOTICE OF ACTION
IN MORTGAGE FORECLOSURE
IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION-LAW
08-493-CD**

The CIT Group/Consumer Finance, Inc.,
Plaintiff v. Tuesday L. Passmore and Leo W.
Coble DEFENDANTS.

**NOTICE OF SHERIFF'S SALE OF
REAL PROPERTY**

TO: Tuesday L. Passmore,
DEFENDANT, 374 Pifer Road, Clearfield,
PA 16830.

Your house (real estate) at 374 Pifer
Road, Clearfield, PA 16830 is scheduled to
be sold at the Sheriff's Sale on October 3,
2008, at 10:00 am in the Clearfield County
Courthouse, 1 North Second Street, Suite
116, Clearfield, PA 16830, to enforce the
court judgment of \$152,168.12, obtained by
Plaintiff above (the mortgagee) against you.
If the sale is postponed, the property will be
relisted for the Next Available Sale.

PROPERTY DESCRIPTION:

ALL that piece or parcel of land situate
in Lawrence Township, Clearfield County,
Pennsylvania, bounded and described as
follows:

BEGINNING at a point on the Mt. Joy
Road, the corner of Mrs. John Butler; thence
East 40.82 perches to post; thence South 56
perches to post; thence North 86 1/2
degrees East 66 perches to township road;
thence along said township road its several
courses to the place of beginning.
Containing 18 acres and 75 perches, more
or less.

BEING known as Parcel #123-K07-000-
00048.

EXCEPTING AND RESERVING
therefrom a certain tract or lot of ground
consisting of one (1) acre which was
conveyed to the Mt. Joy Cemetery

Association, a full description of which will
more fully appear by a deed recorded in
Deed Book 106 at Page 199.

ALSO EXCEPTING AND RESERVING
all that certain parcel of land consisting of
approximately 10 acres acquired by the
Commonwealth of Pennsylvania for the
construction of Route No. 1009, more
popularly known as Interstate 80 Keystone
Short-way. A description of the premises
acquired by the Commonwealth of
Pennsylvania appears on Sheets No. 8, 9,
10, 12 and 52 of the right-of-way plan for
Route No. 1009, Section No. 29, Clearfield
County, Pennsylvania, approved by the
Governor of the Commonwealth of
Pennsylvania on August 25, 1964.

EXCEPTING AND RESERVING all that
certain parcel of land previously conveyed
by the Grantors herein by deed dated June
8, 1971, and recorded in Deed Book 576 at
Page 416, to Luther Ogden and Lee M.
Lanich and Esther C. Lanich, as joint
tenants, with the right of survivorship. Said
parcel of land adjoins the land of the Mt. Joy
Cemetery.

ALSO EXCEPTING AND RESERVING
all the coal and coal rights as contained in
the deed by Tamer Elizabeth Lutz to R. H.
Thompson by a deed dated March 27, 1907,
in Deed Book 166 at Page 108.

BEING the same premises which Lee K.
Lanich and Esther C. Lanich, his wife, by
deed dated July 15, 1971 and recorded July
15, 1971 in Clearfield County in Deed Book
Volume 577, Page 150, granted and
conveyed unto Nicholas Mayhew and Hilda
Mayhew, husband and wife, as tenants by
the entireties.

NOTICE OF OWNER'S RIGHTS

**YOU MAY BE ABLE TO PREVENT
THIS SHERIFF'S SALE**

To prevent this Sheriff's Sale, you must
take immediate action:

1. The sale will be cancelled if you pay
to the mortgagee the back payment, late
charges, costs and reasonable attorney's
fees. To find out how much you must pay,
you may call: (856) 669-5400.

2. You may be able to stop the sale by
filing a petition asking the Court to strike or
open the judgment, if the judgment was
improperly entered. You may also ask the
Court to postpone the sale for good cause.

3. You may also be able to stop the sale
through other legal proceedings. You may
need an attorney to assert your rights. The
sooner you contact one, the more chance
you will have of stopping the sale. (See
notice below on how to obtain an Attorney.)

**YOU MAY STILL BE ABLE TO SAVE
YOUR PROPERTY AND YOU HAVE
OTHER RIGHTS EVEN IF THE SHERIFF'S
SALE DOES TAKE PLACE.**


PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

:

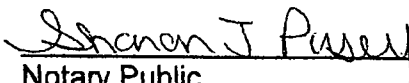
COUNTY OF CLEARFIELD :

On this 5th day of September AD 2008, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement published in said publication in the regular issues of Week of September 5, 2008, Vol. 20, No. 36. And that all of the allegations of this statement as to the time, place, and character of the publication are true.

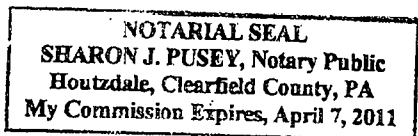


Gary A. Knaresboro, Esquire
Editor

Sworn and subscribed to before me the day and year aforesaid.



Notary Public
My Commission Expires



William J. Mansfield, Inc.
The Woods
998 Old Eagle School Rd Suite 1209
Wayne, PA 19087

EXHIBIT B

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20811
NO: 08-493-CD

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE, INC.
vs.
DEFENDANT: TUESDAY L. PASSMORE AND LEO W. COBLE

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 7/30/2008

LEVY TAKEN 8/14/2008 @ 10:33 AM

POSTED 8/14/2008 @ 10:32 AM

SALE HELD 11/7/2008

SOLD TO FRANK E. LITTLE AND LINDA R. LITTLE

SOLD FOR AMOUNT \$89,000.00 PLUS COSTS

WRIT RETURNED 12/10/2008

DATE DEED FILED 12/10/2008

PROPERTY ADDRESS 374 PIFER ROAD CLEARFIELD , PA 16830

⁵
FILED
01/31/2009
DEC 10 2008
William A. Shaw
Prothonotary/Clerk of Courts

SERVICES

8/25/2008 @ SERVED TUESDAY L. PASSMORE

SERVED TUESDAY L. PASSMORE, DEFENDANT, BY REG & CERT MAIL PER COURT ORDER TO 374 PIFER ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA. CERT #70068010000145074005 CERT & REG MAIL RETURNED UNCLAIMED 8/26/08.

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

8/25/2008 @ SERVED TUESDAY L. PASSMORE

SERVED TUESDAY L. PASSMORE, DEFENDANT BY REG & CERT MAIL PER COURT ORDER TO 933 OLD TURNPIKE ROAD, ALLPORT, CLEARFIELD COUNTY, PENNSYLVANIA. CERT #7006801000045073992 CERT & REG MAIL RETURNED UNCALIMED 8/27/08.

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

8/19/2008 @ 3:06 PM SERVED LEO W. COBLE

SERVED LEO W. COBLE, DEFENDNAT, AT HIS RESIDENCE 933 OLD TURNPIKE ROAD, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO LEO COBLE

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

@ SERVED

NOW, SEPTEMBER 30, 2008 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED FOR OCTOBER 3, 2008 TO NOVEMBER 7, 2008.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20811
NO: 08-493-CD

PLAINTIFF: THE CIT GROUP/CONSUMER FINANCE, INC.
vs.
DEFENDANT: TUESDAY L. PASSMORE AND LEO W. COBLE

Execution REAL ESTATE

SHERIFF RETURN

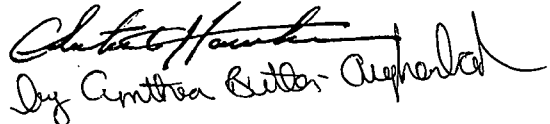
SHERIFF HAWKINS \$2,034.18

SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

The CIT Group/Consumer
Finance, Inc.

Plaintiff

v.

Tuesday L. Passmore
Leo W. Coble

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-493-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

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

374 Pifer Road
Clearfield, PA 16830
SEE LEGAL DESCRIPTION ATTACHED

Amount due

\$152,168.12

Interest From 7/27/08

142.00 Prothonotary costs

to Date of Sale _____

Ongoing Per Diem of \$76.50

to actual date of sale including if sale is
held at a later date

(Costs to be added)

\$ _____

Prothonotary

By Will L. Passmore

Clerk

Date 7/30/08

Received this writ this 30th day
of JULY A.D. 2008
At 2:00 A.M./P.M.

Christopher A. Kwiklis
Sheriff by Antonia Butler Stephen Day

COURT OF COMMON PLEAS
NO. 08-493-CD

=====

The CIT Group/Consumer Finance, Inc.
VS.
Tuesday L. Passmore
Leo W. Coble

=====

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 152,168.12

INTEREST \$ _____
 from 7/27/08
to Date of Sale _____
 Ongoing Per Diem of \$76.50
 to actual date of sale including if sale is
 held at a later date

COSTS PAID:
 PROTHY \$ 142.00

 SHERIFF \$ _____

 STATUTORY \$ _____

COSTS DUE PROTHY. \$ _____

PREMISES TO BE SOLD:
374 Pifer Road
Clearfield, PA 16830



UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 669-5400
pleadings@udren.com

EXHIBIT "A"
LEGAL DESCRIPTION

ALL that piece or parcel of land situate in Lawrence Township, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a point on the Mt. Joy Road, the corner of Mrs. John Butler; thence East 40.82 perches to post; thence South 56 perches to post; thence North 86 1/2 degrees East 66 perches to township road; thence along said township road its several courses to the place of beginning. Containing 18 acres and 75 perches, more or less.

BEING known as Parcel #123-K07-000-00048.

EXCEPTING AND RESERVING therefrom a certain tract or lot of ground consisting of one (1) acre which was conveyed to the Mt. Joy Cemetery Association, a full description of which will more fully appear by a deed recorded in Deed Book 106 at Page 199.

ALSO EXCEPTING AND RESERVING all that certain parcel of land consisting of approximately 10 acres acquired by the Commonwealth of Pennsylvania for the construction of Route No. 1009, more popularly known as Interstate 80 Keystone Shortway. A description of the premises acquired by the Commonwealth of Pennsylvania appears on Sheets No. 8, 9, 10, 12 and 52 of the right-of-way plan for Route No. 1009, Section No. 29, Clearfield County, Pennsylvania, approved by the Governor of the Commonwealth of Pennsylvania on August 25, 1964.

ALSO EXCEPTING AND RESERVING all that certain parcel of land previously conveyed by the Grantors herein by deed dated June 8, 1971, and recorded in Deed Book 576 at Page 416, to Luther Ogden and Lee M. Lanich and Esther C. Lanich, as joint tenants, with the right of survivorship. Said parcel of land adjoins the land of the Mt. Joy Cemetery.

ALSO EXCEPTING AND RESERVING all the coal and coal rights as contained in the deed by Tamer Elizabeth Lutz to R.H. Thompson by a deed dated March 27, 1907, in Deed Book 166 at Page 108.

BEING the same premises which Lee M. Lanich and Esther C. Lanich, his wife, by deed dated July 15, 1971 and recorded July 15, 1971 in Clearfield County in Deed Book Volume 577, Page 150, granted and conveyed unto Nicholas Mayhew and Hilda Mayhew, husband and wife, as tenants by the entireties.

BEING KNOWN AS: 374 Pifer Road
 Clearfield, PA 16830

PROPERTY ID NO.: 123-1607-000-00048

TITLE TO SAID PREMISES IS VESTED IN TUESDAY L. PASSMORE, A SINGLE MAN AND LEO W. COBLE, A SINGLE MAN BY DEED FROM NICHOLAS MAYHEW AND HILDA MAYHEW, HUSBAND AND WIFE DATED 12/1/05 RECORDED 12/8/08 INSTRUMENT NO.: 200521247.

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME TUESDAY L. PASSMORE

NO. 08-493-CD

NOW, December 09, 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 November 07, 2008, I exposed the within described real estate of Tuesday L. Passmore And Leo W. Coble to public venue or outcry at which time and place I sold the same to FRANK E. LITTLE AND LINDA F. LITTLE he/she being the highest bidder, for the sum of \$89,000.00 plus costs and made the following appropriations, viz:

SHERIFF COSTS:

RDR	15.00
SERVICE	15.00
MILEAGE	18.72
LEVY	15.00
MILEAGE	2.00
POSTING	15.00
CSDS	10.00
COMMISSION	1,780.00
POSTAGE	18.46
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	89,000.00
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	20.00
MISCELLANEOUS	40.00
TOTAL SHERIFF COSTS	\$2,074.18

DEED COSTS:

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	32.00
TRANSFER TAX 2%	1,729.56
TOTAL DEED COSTS	\$1,761.56

PLAINTIFF COSTS, DEBT AND INTEREST:

DEBT-AMOUNT DUE	152,168.12
INTEREST @ 76.5000 %	7,879.50
FROM 07/27/2008 TO 11/07/2008	

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	\$160,087.62
--------------------------------	---------------------

COSTS:

ADVERTISING	528.82
TAXES - COLLECTOR	1,923.25
TAXES - TAX CLAIM	1,541.42
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	1,761.56
SHERIFF COSTS	2,074.18
LEGAL JOURNAL COSTS	90.00
PROTHONOTARY	142.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	156.54

TOTAL COSTS	\$8,362.77
--------------------	-------------------

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

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

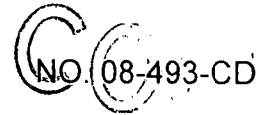
THE CIT GROUP/CONSUMER FINANCE, INC.
Plaintiff

vs.

TUESDAY L. PASSMORE
LEO W. COBLE

Defendants

*
*
*
*
*



ORDER

NOW, this 2nd day of May, 2008, the Plaintiff is granted leave to serve the Complaint in Mortgage Foreclosure upon the Defendant **TUESDAY L. PASSMORE** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821;
3. By certified mail, return receipt requested, to 374 Pifer Road, Clearfield, PA 16830 and 933 Old Turnpike Road, Allport, PA 16821; and
4. By posting the mortgaged premises known in this herein action as 374 Pifer Road, Clearfield, PA 16830.

Service of the aforementioned publication and mailings is effective upon the date of publication and mailing and is to be done by Plaintiff's attorney, who will file Affidavits of Service with the Prothonotary of Clearfield County.

BY THE COURT,

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

/s/ Fredric J. Ammerman

FREDRIC J. AMMERMAN
President Judge

MAY 28 2008

Attest.

Prothonotary/
Clerk of Court

CHESTER A. HAWKINS
SHERIFF

COURTHOUSE

1 NORTH SECOND STREET - SUITE 116
CLEARFIELD, PENNSYLVANIA 16830

ALTOONA PA 166

25 AUG 2008 PM 12:15

"LET US DARE TO READ,
THINK, SPEAK AND WRITE."

John Adams 1755

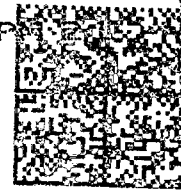
016H16505405

poweroftheletter.com

\$00.590

08/25/2008

Mailed From 16830
US POSTAGE



Hasler

Rec.
8-28-08

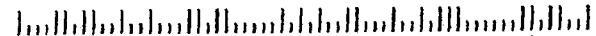
TUESDAY L. PASSMORE
374 PIFER ROAD
CLEARFIELD, PA 16830

NIXIE 165 DE 1 00 08/27/08

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

BC: 16830247201 *1173-09280-25-41

16830168302472



CHESTER A. HAWKINS
SHERIFF

COURTHOUSE

1 NORTH SECOND STREET - SUITE 116
CLEARFIELD, PENNSYLVANIA 16830



016H16505405

\$00.590

08/25/2008

Mailed From 16830
US POSTAGE

Hasler

Rec.
8-27-08

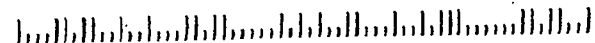
TUESDAY L. PASSMORE
933 OLD TURNPIKE ROAD
ALLPORT, PA 15821

NIXIE 165 DE 1 00 08/27/08

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

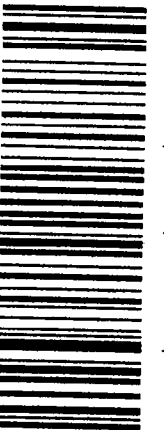
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168302472

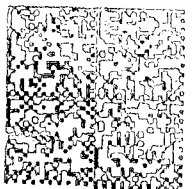




CHESTER A. HAWKINS
SHERIFF
COURTHOUSE
1 NORTH SECOND STREET - SUITE 116
CLEARFIELD, PENNSYLVANIA 16830



7006 0810 0001 4507 3992



Hastler

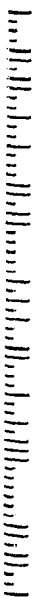
\$05.490
08/25/2008
Billed From 16830
US POSTAGE

TUESDAY L. PASSMORE
933 OLD TURNPIKE ROAD
ALLPORT, PA 16821

NIXIE 165 SE 1 72 08/27/08
NOT DELIVERABLE TO SENDER
UNABLE TO FORWARD

BC: 16830247201 *0596-04073-27-25

1683002472



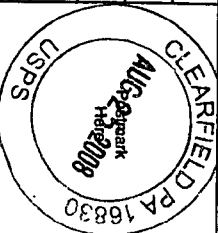
7006 0810 0001 4507 3992

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

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

OFFICIAL USE

Postage	\$ 59
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 549



Sent To
Street, Apt. No.,
or PO Box No.
City, State, ZIP+4
TUESDAY L. PASSMORE
933 OLD TURNPIKE ROAD
ALLPORT, PA 16821

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

TUESDAY L. PASSMORE
933 OLD TURNPIKE ROAD
ALLPORT, PA 16821

2. Article Number (Transfer from service label) **7006 0810 0001 4507 3992**

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☐ Agent
X ☐ Addressee

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

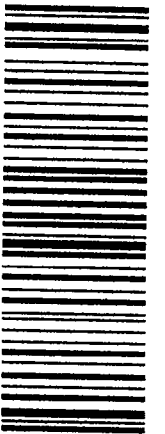
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

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

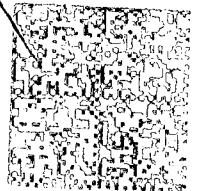
4. Restricted Delivery? (Extra Fee) ☐ Yes



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



7006 0810 0001 4507 4005



Master

000000000000
\$05.490
08/25/2008
US POSTAGE

rec
8-26-08

W

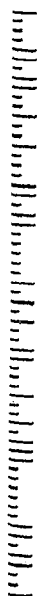
TUESDAY L. PASSMORE
374 PIFER ROAD
CLEARFIELD, PA 16830

NIXIE 165 4E 1 72 08/27/08

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD

BC: 16830247201 *0596-00664-27-26

1683002472



7006 0810 0001 4507 4005

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

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

OFFICIAL USE

Postage	\$ 5.9
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.49



Sent To

Street, Apt. No.,
or PO Box No.
City, State, ZIP+4

TUESDAY L. PASSMORE
374 PIFER ROAD
CLEARFIELD, PA 16830

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE
CERTIFIED MAIL

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

TUESDAY L. PASSMORE
374 PIFER ROAD
CLEARFIELD, PA 16830

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

☒ Certified Mail

☐ Express Mail

☐ Registered

☐ Return Receipt for Merchandise

☐ Insured Mail

☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

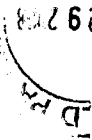
(Transfer from service label)

7006 0810 0001 4507 4005

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540



UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620
856. 669. 5400
FAX: 856. 669. 5399

PENNSYLVANIA OFFICE
215-368-9500

MARK J. UDREN*
STUART WINNEG**
LORRAINE DOYLE**
ALAN M. MINATO***
CHANDRA M. ARKEMA***
*ADMITTED NJ, PA, FL
**ADMITTED PA
***ADMITTED NJ, PA
TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PLEASE RESPOND TO NEW JERSEY OFFICE

September 29, 2008

Sent via telefax #814-765-5915

Clearfield County Sheriff's Office
1 North Second Street
Suite 116
Clearfield, PA 16830
ATTN: Cindy

Re: The CIT Group/Consumer Finance, Inc.
vs.
Tuesday L. Passmore
Leo W. Coble
Clearfield County C.C.P. No. 08-493-CD
Premises: 374 Pifer Road (Lawrence Township)
Clearfield, PA 16830
SS Date: October 3, 2008

Dear Cindy:

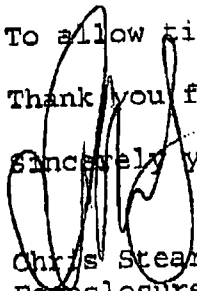
Please POSTPONE the Sheriff's Sale scheduled for October 3, 2008
to November 7, 2008.

Sale is Postponed for the following reason:

To allow time to complete service of the Notice of Sale.

Thank you for your attention to this matter.

Sincerely yours,


Chris Stears
Foreclosure Manager

/kap