

08-493-CD

Cit Group al vs Tuesday Passmore et al

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**

The CIT Group/Consumer  
Finance, Inc.

Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

## MORTGAGE FORECLOSURE

Tuesday L. Passmore  
Leo W. Coble

NO. 08-493-CD

**Defendant(s)**

# PRAECIPE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Please issue Writ of Execution in the above matter:

Amount due \$152,168.12 142.00 Prothonotary costs  
Interest From 7/27/08

(Costs to be added)

\$152,168.12 142.00 Prothonotary costs

UDREN LAW OFFICES, P.C.

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

FILED Atty pd. 20.00  
M 1:09 AM JUL 30 2008 ICC & 6 writs  
BOSTON, MA w/ prop. desc. to  
William A. Shaw Sheriff  
Prothonotary/Clerk of Courts

UDREN LAW OFFICES, P.C.

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[pleadings@udren.com](mailto:pleadings@udren.com)

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Defendant(s)

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
- 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: Chandra Arkema  
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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The CIT Group/Consumer  
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COURT OF COMMON PLEAS  
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## MORTGAGE FORECLOSURE

NO. 08-493-CD

Tuesday L. Passmore

Leo W. Coble

Defendant(s)

**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 Praecept for the Writ of Execution was filed the following information concerning the real property located at: 374 Pifer Road, Clearfield, PA 16830

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

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 \_\_\_\_\_

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: *Chandra Arkema*  
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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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

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 Willie L. Shaefer

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

Chandra Arkema

UDREN LAW OFFICES, P.C.

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

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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.

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ATTORNEY FOR PLAINTIFF

FILED Atty pd.  
M 10:35 AM 95.00  
MAR 19 2008  
4CC Sheriff  
William A. Shaw  
Prothonotary/Clerk of Courts

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

v.

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

COURT OF COMMON PLEAS  
CIVIL DIVISION

Clearfield County

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

June 5, 2008 Document  
Reinstated, Reissued to Sheriff's Attorney  
for service

William A. Shaw  
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 asentir una comparecencia 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 daфиnde, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, 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 SUFFICIENTE 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% *<br>from 7/1/07 to 2/8/08<br>(the per diem interest accruing on<br>this debt is \$76.50 and that sum<br>should be added each day after<br>2/8/08) | 5,911.71            |
| Title Report   | 325.00              |
| Court Costs (anticipated, excluding<br>Sheriff's Sale costs)   | 280.00              |
| Late Charges<br>(monthly late charge of \$46.79<br>should be added in accordance<br>with the terms of the note<br>each month after 2/8/08)                                   | 237.16              |
| Corporate Advance  | 93.50               |
| Attorneys Fees (anticipated and actual<br>to 5% of principal)  | <u>6,291.02</u>     |
| <b>TOTAL</b>   | <b>\$138,958.88</b> |

\* 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.

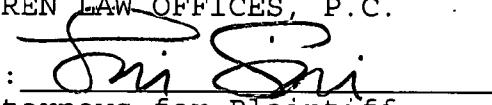
BY:   
Attorneys for Plaintiff  
MARK J. UDREN, ESQUIRE  
STUART WINNEG, ESQUIRE  
LORRAINE DOYLE, ESQUIRE  
ALAN M. MINATO, ESQUIRE  
CHANDRA M. ARKEMA, ESQUIRE  
LOUIS A. SIMONI, ESQUIRE

EXHIBIT "A"  
LEGAL DESCRIPTION

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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.

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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 INMEDIATAMENTE 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:

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

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/Servicer: | <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

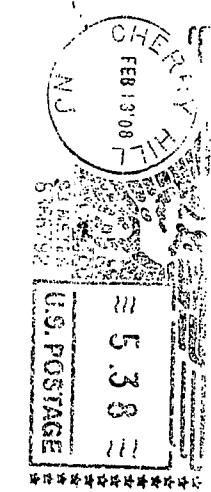
CCCS of Western Pennsylvania, Inc.  
217 E. Plank Road  
Altoona PA 16602  
(814) 944-8100  
FAX (814) 944-5747

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

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



7007 3020 0000 0000 0879 9697 4694

QUEEN LAW OFFICES, Etc.  
WOODCREST CORRIDOR, 1670

PLEASE 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:

Leo W. Coble  
 933 Old Turnpike Road  
 Airport, 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

Express Mail

Registered

Return Receipt for Merchandise

Insured Mail

C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

**Certified Mail Provides:**

■ A mailing receipt

■ A unique identifier for your mailpiece

■ A record of delivery kept by the Postal Service for two years

■ Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.

■ NO INSURANCE COVERAGE IS PROVIDED WITH CERTIFIED MAIL.

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2. Article Number  
 (Transfer from service label)

7007 3020 0000 0876 5943

Domestic Return Receipt

102595-02-M-1540





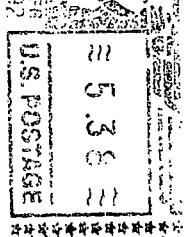
Tuesday L. Passmore  
933 Old Turnpike Road  
Allport, PA 16821

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

**CERTIFIED MAIL™**



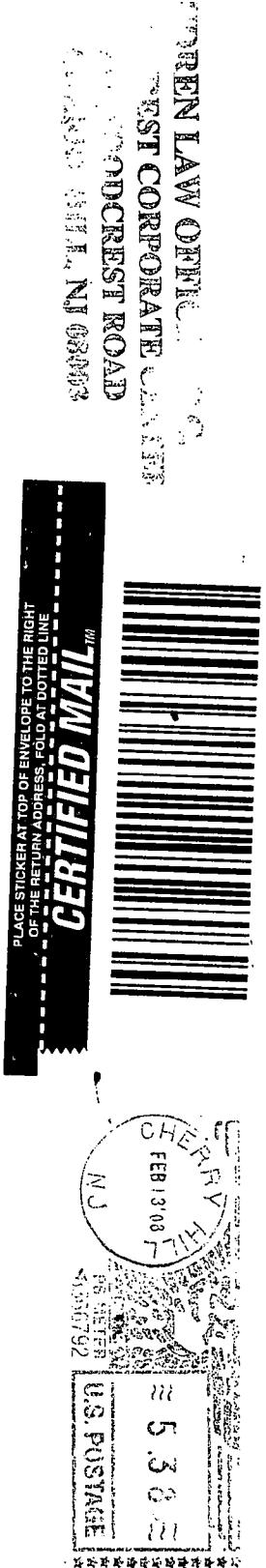
6269 9280 0000 0200 2002



OPEN LAW OFFICES  
OF THE  
COUNSELOR ROYAL  
P.C.



Tuesday L. Passmore  
374 Pifer Road  
Clearfield, PA 16830

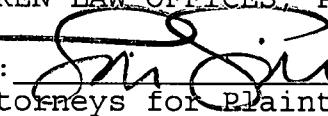




V E R I F I C A T I O N

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

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Tuesday L. Passmore  
Leo W. Coble

Defendant(s)

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

The CIT Group/Consumer  
Finance, Inc.

Plaintiff

v.  
Tuesday L. Passmore  
Leo W. Coble

Defendant(s)

ATTORNEY FOR PLAINTIFF

FILED *No cc*  
*M 10:56 AM*  
MAY 27 2008 *CP*

William A. Shaw  
Prothonotary/Clerk of Courts

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

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.  
MARK J. UDREN, ESQUIRE - ID #04302  
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856-669-5400, pleadings@udren.com

ATTORNEY FOR PLAINTIFF

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

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: 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.  
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  
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CHERRY HILL, NJ 08003-3620  
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

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.  
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 pleadings@udren.com

ATTORNEY FOR PLAINTIFF

The CIT Group/Consumer  
Finance, Inc.

Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Tuesday L. Passmore  
Leo W. Coble

MORTGAGE FORECLOSURE

Defendant(s)

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  
Alipoint, 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 INFORMATION**A. SOCIAL SECURITY NUMBER(S): **177-50-8276**

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, Alipoint, 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 &amp; 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

Erica Smith  
Notary Public - Notary Seal  
State of Missouri  
County of St. Charles  
Expires May 02, 2008

Players National Locator 174 Clarkson Road, Ste 225 Ellisville, MO 63011  
(636)230-9922 (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.  
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LORRAINE DOYLE, ESQUIRE - ID #34576  
ALAN M. MINATO, ESQUIRE - ID #75860  
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WOODCREST CORPORATE CENTER  
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CHERRY HILL, NJ 08003-3620  
856-669-5400, pleadings@udren.com

ATTORNEY FOR PLAINTIFF

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

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

THE CIT GROUP/CONSUMER FINANCE, INC. \*  
Plaintiff \*  
vs. \* NO. 08-493-CD  
TUESDAY L. PASSMORE \*  
LEO W. COBLE \*  
Defendants \*

O R D E R

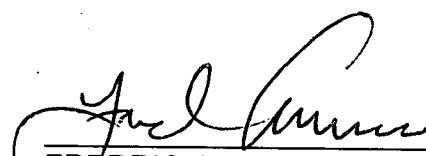
NOW, this 2<sup>nd</sup> day of May, 2008, the Plaintiff is granted leave to serve the  
Complaint in Mortgage Foreclosure upon the Defendant **TUESDAY L. PASSMORE**  
by:

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 11:55a.m. 6K  
MAY 28 2008 3CC TO  
WILLIAM A. ARKEMA  
William A. Shaw  
Prothonotary/Clerk of Courts  
GK

  
FREDRIC J. AMMERMAN  
President Judge

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

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  
M 11:19 AM 08  
JUN 16 2008  
NO CC

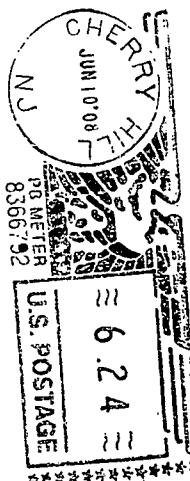
William A. Shaw  
Prothonotary/Clerk of Courts

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

Tuesday L. Rossmore  
933 Old Turnpike Road  
Airport, PA 116821

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

**CERTIFIED MAIL™**



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

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

**OFFICIAL USE**

9E95 2280 0000 020E 4002  
9E95 2280 0000 020E 2002

|   |    |
|---|----|
| Postage   | \$ |
| Certified Fee                                     |    |
| Return Receipt Fee<br>(Endorsement Required)      |    |
| Restricted Delivery Fee<br>(Endorsement Required) |    |
| Total Postage & Fees                              | \$ |

Postmark  
Here

Send to *Tuesday L. Rossmore*  
Street, Apt. No.,  
or PO Box No.  
City, State, ZIP/Postal Code  
PS Form 3800, August 2006

See Reverse for Instructions

NIKKI

| SENDER: COMPLETE THIS SECTION  |  |  |  |   |  |   |  |
|--|--|--|--|---|--|---|--|
| <ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>   |  |  |  |   |  |   |  |
| <b>COMPLETE THIS SECTION ON DELIVERY</b>   |  |  |  |   |  |   |  |
| <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; padding: 5px;"> <b>A. Signature</b><br/> <input checked="" type="checkbox"/> </td> <td style="width: 50%; padding: 5px;"> <input type="checkbox"/> Agent<br/> <input type="checkbox"/> Addressee         </td> </tr> <tr> <td colspan="2" style="padding: 5px;"> <b>B. Received by (Printed Name)</b>      <b>C. Date of Delivery</b> </td> </tr> <tr> <td colspan="2" style="padding: 5px;"> <b>D. Is delivery address different from item 1?</b>      <input type="checkbox"/> Yes<br/> <input type="checkbox"/> No<br/>           If YES, enter delivery address below:         </td> </tr> </table> |  | <b>A. Signature</b><br><input checked="" type="checkbox"/> | <input type="checkbox"/> Agent<br><input type="checkbox"/> Addressee | <b>B. Received by (Printed Name)</b> <b>C. Date of Delivery</b> |  | <b>D. Is delivery address different from item 1?</b> <input type="checkbox"/> Yes<br><input type="checkbox"/> No<br>If YES, enter delivery address below: |  |
| <b>A. Signature</b><br><input checked="" type="checkbox"/>   | <input type="checkbox"/> Agent<br><input type="checkbox"/> Addressee |  |  |   |  |   |  |
| <b>B. Received by (Printed Name)</b> <b>C. Date of Delivery</b>  |  |  |  |   |  |   |  |
| <b>D. Is delivery address different from item 1?</b> <input type="checkbox"/> Yes<br><input type="checkbox"/> No<br>If YES, enter delivery address below:  |  |  |  |   |  |   |  |
| <b>3. Service Type</b><br><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail<br><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise<br><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.  |  |  |  |   |  |   |  |
| <b>4. Restricted Delivery? (Extra Fee)</b> <input type="checkbox"/> Yes  |  |  |  |   |  |   |  |

PS Form 3800, August 2001 (Rev. 08/01) PSN 7530-02-00-9047

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

Recipient is not needed, delete and affix label with postage and mail.

If a postmark on the Certified Mail receipt is desired, please present the article to the post office for a postmark.

Recipient is not needed, address the clerk or mark the mailpiece with the addressee's address.

For an additional fee, delivery may be restricted to the addressee or end recipient.

For an additional fee, a USPS® postmark on your Certified Mail receipt is required.

Delivery to return recipient, Return Receipt Requested. To receive a fee waiver for the fee, Enclose mailpiece, Return Receipt Requested. To cover the additional fee, Enclose Form 3811, To the article and attach a Return Receipt.

For an additional fee, a Return Receipt may be requested to provide protection for an article returned to the recipient.

No INSURANCE PROVIDED WITH CERTIFIED MAIL. For valuable mail, please consider insured or Registered Mail.

Certified Mail is not available for any class of International mail.

A record of delivery kept by the Postal Service for two years.

A mailing identifier for your mailpiece

Certified Mail Provides:

A unique identifier for your mailpiece

Delivery to your mailpiece

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

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

**CERTIFIED MAIL**



6295 22.90 00000 020E 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](http://www.usps.com)

**OFFICIAL USE**

|   |    |
|---|----|
| Postage   | \$ |
| Certified Fee                                     |    |
| Return Receipt Fee<br>(Endorsement Required)      |    |
| Restricted Delivery Fee<br>(Endorsement Required) |    |
| Total Postage & Fees                              | \$ |

Postmark  
Here

Sent To: **Tuesday L. Passmore**  
Street, Apt. No.,  
or PO Box No.  
City, State, ZIP+4  
**374 Pifey Road**  
**Clearfield, PA 16830**

PS Form 3800, August 2006

See Reverse for Instructions



Tuesday L. Passmore  
374 Pifey Road  
Clearfield, PA 16830

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.

**COMPLETE THIS SECTION ON DELIVERY**

|                                      |  |
|--------------------------------------|--|
| <b>X</b>                             | A. Signature   |
| <b>B. Received by (Printed Name)</b> | <input type="checkbox"/> Agent<br><input type="checkbox"/> Addressee |
| <b>C. Date of Delivery</b>           |  |

D. Is delivery address different from item 1?  Yes  No

TUESDAY C. FASMANE  
374 RIVER ROAD  
CLEARFIELD, PA 16830

333-334/300A

Domestic Return Receipt

102595-02-M-1540

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

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

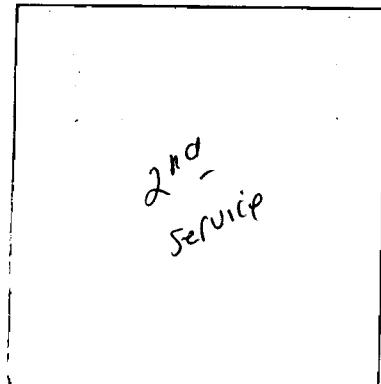
ORDER

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  
07/07/2008  
JUL 07 2008

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

Day of 2008



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

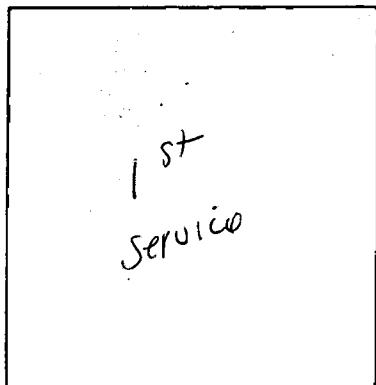
TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

**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**

07/07/2008  
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.  
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](mailto:pleadings@udren.com)

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

v.

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

ATTORNEY FOR PLAINTIFF

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

COURT OF COMMON PLEAS  
CIVIL DIVISION  
I hereby certify this to be a true  
and accurate copy of the original  
statement filed in this case.  
Clearfield County

MAR 19 2008

Attest,

NO. 08-493-CD

*William L. Coble*  
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. 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 asentir 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 dafiene, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, 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 SUFFICIENTE 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% *<br>from 7/1/07 to 2/8/08<br>(the per diem interest accruing on<br>this debt is \$76.50 and that sum<br>should be added each day after<br>2/8/08) | 5,911.71        |
| Title Report   | 325.00          |
| Court Costs (anticipated, excluding<br>Sheriff's Sale costs)   | 280.00          |
| Late Charges<br>(monthly late charge of \$46.79<br>should be added in accordance<br>with the terms of the note<br>each month after 2/8/08)                                   | 237.16          |
| Corporate Advance  | 93.50           |
| Attorneys Fees (anticipated and actual<br>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.

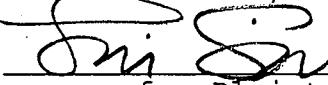
7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the 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 INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO **THE 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:

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

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:**

|                                 |                                    |
|---------------------------------|------------------------------------|
| <b>Name of Lender/Servicer:</b> | <u>CIT</u>                         |
| <b>Address:</b>                 | <u>715 South Metropolis Avenue</u> |
|                                 | <u>Suite 150</u>                   |
|                                 | <u>Oklahoma City, OK 73108</u>     |
| <b>Phone Number:</b>            | <u>1-800-621-1437</u>              |
| <b>Fax Number:</b>              | <u>1-405-553-4790</u>              |
| <b>Contact Person:</b>          | <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

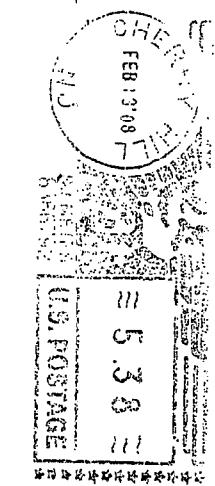
Indiana Co. Community Action Program  
827 Water Street, Box 187  
Indiana, PA 15701  
(724) 465-2657  
FAX (412) 465-5118

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

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



7007 3020 0000 0876 943

■ 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  
933 Old Turnpike Road  
Airport, PA 16821

**SENDER: COMPLETE THIS SECTION**

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

**X**

Agent

Addressee

**B. Received by (Printed Name)**

**X**

**C. Date of Delivery**

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

**If YES, enter delivery address below:  No**

**Important Reminders:**

- A mailing recipient 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.
- DELIVERY TO RETURN RECIPIENT MAY BE REQUESTED TO PROVIDE PROOF OF RECEIPT (PS FORM 3811) TO THE ADDRESSEE AND ADD APPLICABLE POSTAGE TO COVER THE ADDRESSEE'S UNAUTHORIZED RECEIPT OF CERTIFIED MAIL.
- ADDRESSEES, UNAUTHORIZED RECEIPT OF CERTIFIED MAIL MAY BE REQUIRING ADDITIONAL FEE, DELIVERY MAY BE RESTRICTED TO THE ADDRESSEE OR ADDRESSEES AUTHORIZED AGENT. ADVISE THE CLERK OR MARK THE MAILPIECE WITH THE ENDORSEMENT "RESTRICTED DELIVERY".
- FOR AN ADDITIONAL FEE, ADDRESSEES MAY BE RESTRICTED TO THE ADDRESSEE OR ADDRESSEES AUTHORIZED AGENT. ADVISE THE CLERK OR MARK THE MAILPIECE WITH THE ENDORSEMENT "RESTRICTED DELIVERY".
- IF A POSTMASTER ON THE CERTIFIED MAIL RECEIPT IS DESIRED, PLEASE PRESENT THE CERTIFIED MAIL RECEIPT IS NOT NEEDED, DETACH AND ATTACH POSTAGE AND MAIL.
- IF A POSTMASTER ON THE CERTIFIED MAIL RECEIPT IS DESIRED, PLEASE PRESENT THE CERTIFIED MAIL RECEIPT ON THE POST OFFICE FOR POSTMASTERING. IF A POSTMASTER ON THE CERTIFIED MAIL RECEIPT IS DESIRED, PLEASE PRESENT THE CERTIFIED MAIL RECEIPT ON THE POST OFFICE FOR POSTMASTERING.

**Certified Mail Provides:**

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 6743

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-14-1540

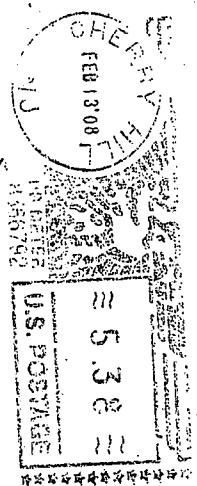
Leo W. Coble  
374 Pifer Road  
Clarifield, PA 16830

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

U.S. POSTAL SERVICE  
CERTIFIED MAIL CENTER  
PROFESSIONAL MAIL OFFICES, INC.



7007 3020 0000 0876 9936





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



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

- At the post office for postmarking, if a postmark is desired, please present the certified mail receipt is not needed, detach and affix label with postage and mail.
- If a postmark in the certified mail receipt is desired, please present the certified mail addresser's authorized agent the clerk or mark the mailpiece with the addressee's name and "Restricted Delivery".
- 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 addressee's name and "Restricted Delivery".
- For an additional fee, delivery may be completed to the addressee or addressee's authorized agent the clerk or mark the mailpiece with the addressee's name and "Restricted Delivery".
- 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<sup>®</sup> postmark on your certified mail receipt is required.
- For an additional fee, a 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<sup>®</sup> postmark on your certified mail receipt is required.
- For an additional fee, a 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<sup>®</sup> postmark on your certified mail receipt is required.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuable items, consider insured or Registered Mail.
- Certified Mail is not available for any class of international mail.
- Certified Mail may ONLY be combined with First-Class Mail<sup>®</sup> or Priority Mail.
- A record of delivery kept by the Postal Service for two years.
- A unique identifier for your mailpiece.
- A mailing receipt.

**Certified Mail Providers:**

- Certified Mail may ONLY be combined with First-Class Mail<sup>®</sup> or Priority Mail.
- A record of delivery kept by the Postal Service for two years.
- A unique identifier for your mailpiece.
- A mailing receipt.

**SENDER: COMPLETE THIS SECTION**

**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**

**No**

**If YES, enter delivery address below:**

Tuesday L. Passmore  
933 Old Turnpike Road

Allport, PA 16821

**3. Service Type**

Certified Mail

Registered

Insured Mail

C.O.D.

Express Mail

Return Receipt for Merchandise

**4. Restricted Delivery? (Extra Fee)  Yes**

2. Article Number **7007 3020 0000 0876 6929**

(Transfer from service label)

Tuesday L. Passmore  
374 Pifer Road  
Clearfield, PA 16830



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

**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 Addressee to:

Tuesday L. Passmore  
374 Pifer Road  
Clearfield, PA 16830

**COMPLETE THIS SECTION ON DELIVERY**

## A. Signature

## B. Received by (Printed Name)

## C. Date of Delivery

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

## 3. Service Type

|  |  |
|--|--|
| <input checked="" type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail                              |
| <input type="checkbox"/> Registered                | <input checked="" type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail              | <input type="checkbox"/> C.O.D.                                    |

## 4. Restricted Delivery? (Extra Fee)

</

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.  
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](mailto:pleadings@udren.com)

ATTORNEY FOR PLAINTIFF

"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  
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

Attest.

*William L. Clegg*  
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 asentear 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. Ademas, 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 SUFFICIENTE 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<br>(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>     |
| <b>TOTAL</b>  | <b>\$138,958.88</b> |

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

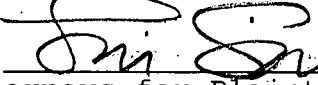
7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the 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 INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN PRESTAMO POR EL PROGRAMA LLAMADO **THE 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<br><u>Leo W. Coble</u>    |
| PROPERTY ADDRESS:    | 374 Pifer Road<br><u>Clearfield, PA 16830</u> |
| 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:

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

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/Servicer: | <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

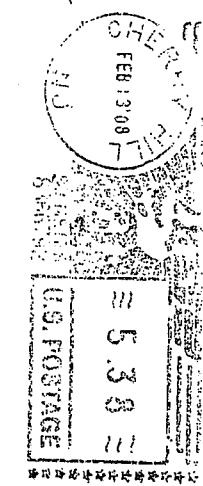
Indiana Co. Community Action Program  
827 Water Street, Box 187  
Indiana, PA 15701  
(724) 465-2657  
FAX (412) 465-5118

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

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



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U.S. POSTAL LAW (P.L. 96-223, 1984, P.L. 97-248, 1986)  
WORLDWIDE COMMUNICATIONS

IN A DOCUMENT

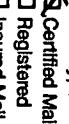
Leo W. Coble  
933 Old Turnpike Road  
Altoona, PA 16821

| COMPLETE THIS SECTION ON DELIVERY   |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
|---|--|--|---------------------------------------|---|--|---------------------------------------|---------------------------------|--------------------------------------|--|----------------------------|--|---|--|
| <p><b>SENDER: COMPLETE THIS SECTION</b></p> <ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>  |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <p>1. Article Addressed to:</p> <p>Leo W. Cobble<br/>933 Old Turnpike Road<br/>Airport, PA 16821</p>  |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <table border="1"> <tr> <td colspan="2">A. Signature</td> </tr> <tr> <td colspan="2"> <input checked="" type="checkbox"/> Agent           </td> </tr> <tr> <td colspan="2"> <input type="checkbox"/> Addressee           </td> </tr> <tr> <td colspan="2"> <p>B. Received by (Printed Name)</p> </td> </tr> <tr> <td colspan="2"> <p>C. Date of Delivery</p> </td> </tr> <tr> <td colspan="2"> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes<br/>If YES, enter delivery address below: <input type="checkbox"/> No</p> </td> </tr> </table> |  | A. Signature                                       |                                       | <input checked="" type="checkbox"/> Agent |  | <input type="checkbox"/> Addressee    |                                 | <p>B. Received by (Printed Name)</p> |  | <p>C. Date of Delivery</p> |  | <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes<br/>If YES, enter delivery address below: <input type="checkbox"/> No</p> |  |
| A. Signature  |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <input checked="" type="checkbox"/> Agent   |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <input type="checkbox"/> Addressee  |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <p>B. Received by (Printed Name)</p>  |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <p>C. Date of Delivery</p>  |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes<br/>If YES, enter delivery address below: <input type="checkbox"/> No</p>   |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <p>3. Service Type</p> <table> <tr> <td> <input checked="" type="checkbox"/> Certified Mail           </td> <td> <input type="checkbox"/> Express Mail           </td> </tr> <tr> <td> <input type="checkbox"/> Registered           </td> <td> <input checked="" type="checkbox"/> Return Receipt for Merchandise           </td> </tr> <tr> <td> <input type="checkbox"/> Insured Mail           </td> <td> <input type="checkbox"/> C.O.D.           </td> </tr> </table>  |  | <input checked="" type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail | <input type="checkbox"/> Registered       | <input checked="" type="checkbox"/> Return Receipt for Merchandise | <input type="checkbox"/> Insured Mail | <input type="checkbox"/> C.O.D. |                                      |  |                            |  |   |  |
| <input checked="" type="checkbox"/> Certified Mail  | <input type="checkbox"/> Express Mail                              |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <input type="checkbox"/> Registered   | <input checked="" type="checkbox"/> Return Receipt for Merchandise |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <input type="checkbox"/> Insured Mail   | <input type="checkbox"/> C.O.D.                                    |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>   |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |
| <p>2. Article Number<br/><i>(Transfer from service label)</i> 7007 3020 0000 0876 6943</p>  |  |  |                                       |   |  |                                       |                                 |                                      |  |                            |  |   |  |

**IMPORTANT:** Save this receipt and present it when making an inquiry.  
PS Form 3800, August 2006 (Rev 06/06) PSN 7530-0-000-9047

- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuable packages, 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 attach a Return Receipt (PS Form 38-11) to the article and add applicable postage to cover the fee. Endorsements multiply Return Receipt fees. Please complete and attach a Return Receipt to the postmark on your Certified Mail receipt is required.
- Delivery, to obtain Return Receipt service, may be requested to provide proof of delivery. A Return Receipt may be requested on Registered Mail. For an additional fee, a Return Receipt may be requested on Registered Mail.
- For an additional fee, a Return Receipt is issued for Registered Mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuable packages, please consider insured or International Mail.
- Certified Mail is not available for any class of International Mail.
- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- If a postmark on the post office 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 a label with the Certified Mail address, as authorized delivery.
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■ A record of delivery kept by the Postal Service for two years

|  |  |
|--|--|
| <p><b>A. Signature</b></p>       |  |
| <p><b>B. Received by (Printed Name)</b></p>  |  |
| <p><b>C. Date of Delivery</b></p>  |  |
| <p><b>D. Is delivery address different from item 1?</b></p>  |  |
| <p>If YES, enter delivery address below:</p>   |  |
| <p><b>4. Restricted Delivery? (Extra Fee)</b></p>  |  |
| <p><input checked="" type="checkbox"/> Certified Mail      <input type="checkbox"/> Express Mail</p>               |  |
| <p><input checked="" type="checkbox"/> Registered      <input type="checkbox"/> Return Receipt for Merchandise</p> |  |
| <p><input type="checkbox"/> Insured Mail      <input type="checkbox"/> C.O.D.</p>                                  |  |
| <p><input type="checkbox"/> Yes</p>  |  |

**SENDER: COMPLETE THIS SECTION**

COMPLETE THIS SECTION ON DELIVERY

1. Article Addressed to:
  - 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:

### **Certified Mail Provides:**

Leo W. Coble  
374 Pifer Road  
Clearfield, PA 16830



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

receipt is not needed, detach and affix label with postage and mail.

It is a postmark on the Certified Mail receipt is desired, please present the article addressee's authorized agent. Advises the clerk or mark the mailpiece with the endorsement "Restriced Delivery".

■ For an additional fee delivery may be restricted to the addresses listed below.

- For an additional fee, Reclaim Receipt may be requested to provide proof of delivery. To obtain Reclaim Receipt service, please complete and attach a Return Receipt (PS Form 381) to the article and add applicable postage to cover the delivery charges.

- Certified Mail is not available for any class of international mail.
- Certified Mail may only be combined with First-Class Mail® or Priority Mail®.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For additional details please refer to the [Rate Tables](#).

Important Reminders: [View](#) [Print](#) [Email](#) [Share](#)

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

## Certified Mail Provides:

— — — — —

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.

COMPLETE HISTORY OF EGYPT

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| <b>A. Signature</b>  |                            |
| <b>X</b>   |                            |
| <b>B. Received by (Printed Name)</b>   | <b>C. Date of Delivery</b> |
| <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes<br/>         If YES, enter delivery address below: <input type="checkbox"/> No</p> |                            |

|  |  |   |
|--|--|---|
| X  |  | A. Signature  |
| B. Received by (Printed Name).....   |  | C. Date of Delivery   |
| D. Is delivery address different from item 17. <input type="checkbox"/> Yes<br>If YES, enter delivery address below: <input type="checkbox"/> No |  | D. <input type="checkbox"/> Agent<br><input type="checkbox"/> Addressee |

Leo W. Coble  
374 Pifer Road  
Clearfield, PA 16830

## 2. Article Number

תְּמִימָנָה תְּמִימָנָה

PS Form 3811, February 2004

## Domestic Return Receipt

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

7007 3020 0000 0000 0000 0000 0000 9769 6269



Tuesday L. Passmore  
374 Pfaff Road

Clearfield, PA 16830





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.  
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 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/11/08 261 \$7.00  
JUN 05 2008

William A. Shaw  
Prothonotary/Clerk of Courts

1 Compl. reinstated  
to Sheriff

(6)

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

THE CIT GROUP/CONSUMER FINANCE, INC.

Plaintiff

\*

\*

\*

NO. 08-493-CD

\*

\*

TUESDAY L. PASSMORE  
LEO W. COBLE

Defendants

\*

\*

O R D E R

NOW, this 2<sup>nd</sup> 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

MAY 28 2008

---

FREDRIC J. AMMERMAN  
President Judge

Attest.

*William J. Ammerman*  
Prothonotary/  
Clerk of Court

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 08003-3620  
856-669-5400  
[pleadings@udren.com](mailto:pleadings@udren.com)

ATTORNEY FOR PLAINTIFF

FILED  
COPY 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

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

v.

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

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

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

COPY

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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-493-CD

THE CIT GROUP/CONSUMER FINANCE INC.

vs

TUESDAY L. PASSMORE and LEO W. COBLE

COMPLAINT IN MORTGAGE FORECLOSURE & ORDER

SERVICE # 1 OF 1

SERVE BY: 07/05/2008

HEARING:

PAGE: 104252

**FILED**

08/15/08 AM 6:46

JUN 11 2008

(610)

DEFENDANT: TUESDAY L. PASSMORE  
ADDRESS: 374 PIFER ROAD  
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

William A. Shaw  
Prothonotary/Clerk of Courts

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

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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  
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

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William A. Shaw  
Prothonotary/Clerk of Courts

CLASS A CDL Driver needed immediately for  
MAIL Contractor. Part time position out of Ky-  
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MVR and able to pass FBI background check.  
Call Beerm Bros. Trucks Inc. at 800-824-2846.

Employment

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**PROOF OF PUBLICATION**

STATE OF PENNSYLVANIA :  
COUNTY OF CLEARFIELD : SS

SS:

On this 30th day of June, A.D. 2008, 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. 1 /

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

Sworn and Subscribed  
Creedy J. Robison  
Notary Public Clearfield, Pa.

My Commission Expires  
October 31, 2011

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

**Notary Public  
My Commission Expires**

## 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

三

JUL 16 2008

William A. Shaw  
Prothonotary/Clerk of Courts

## МОТАЦИИ ПО СЮРР

APPENDIX NUMBER 3 TO STATE

### COMMITTEE OF CHARTERS

Witnesse the 21st day of April, 2008. CA signed to witness this affidavit.  
Aye D. Baskerville, witness, 2012 days young & I have read this affidavit &  
to the best of my knowledge & belief it is true to the best of my knowledge &  
believe and I have signed it this 21st day of April, 2008. Aye D. Baskerville  
Aye D. Baskerville, witness, 2012 days young & I have read this affidavit &  
believe and I have signed it this 21st day of April, 2008. Aye D. Baskerville

*Crupina vulgaris* A. Nels.

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Mr. James H. M.   
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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](mailto:pleadings@udren.com)

ATTORNEY FOR PLAINTIFF

**FILED** Atty pd. \$20.00  
M 11:09 AM JUL 30 2008 Notice to  
Def.  
W.A. Shaw Statement to  
Prothonotary/Clerk of Courts  
Atty

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

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

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

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     |                     |
| <br>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.

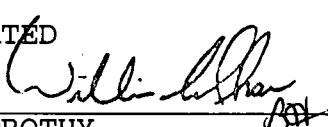
BY: Chandra Arkema

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

  
PRO PROTHY

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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856-669-5400

[pleadings@udren.com](mailto:pleadings@udren.com)

ATTORNEY FOR PLAINTIFF

FILED  
MAY 19 2008  
COPY  
William A. Shaw  
Prothonotary/Clerk of Courts

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

v.

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

COURT OF COMMON PLEAS  
CIVIL DIVISION

Clearfield County

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

080176  
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## Verbal Confirmation of Service of Complaint

Date: 4/21/08

Spoke with: Marilynn

Defendant(s): Tuesday Passmore was served on \_\_\_\_\_  
at: prop vacant  
no s/c made @ the mailing

Defendant(s): Leo Coble was served on 4/1/08  
at: 933 Old Turnpike Road  
Allentown, 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

TUESDAY L. PASSMORE and LEO W. COBLE

COMPLAINT IN MORTGAGE FORECLOSURE & ORDER

SERVICE # 1 OF 1

SERVE BY: 07/05/2008 HEARING: PAGE: 104252

DEFENDANT: TUESDAY L. PASSMORE  
ADDRESS: 374 PIFER ROAD  
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH POSTON 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 150 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

**COPY**

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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CHERRY HILL, NJ 08003  
856-669-5400  
[pleadings@udren.com](mailto: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 IMMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFFICIENTE 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 ASSISTENCIA LEGAL.

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

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

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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

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CHERRY HILL, NJ 08003  
856-669-5400  
[pleadings@udren.com](mailto: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  
933 Old Turnpike Road  
Allport, PA 16821

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 IMMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFFICIENTE 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 ASSISTENCIA LEGAL.

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

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  
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

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

:

COUNTY OF CAMDEN

SS

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

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

Chandria Arkema  
Name: \_\_\_\_\_  
Title: ATTORNEY FOR PLAINTIFF  
Company: UDREN LAW OFFICES, P.C.

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.  
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  
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  
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.

*William J. Udren 7/3/08*

Prothonotary

- 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  
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  
[pleadings@udren.com](mailto: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.

*Prothonotary  
John L. Shan  
7/30/08  
BA*

- 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  
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

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  
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.

Prothonotary

7/30/08  
CJ

- 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.

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: \$

Vs. Costs: \$

Int. From: \$

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

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: July 30, 2008

Expires: July 30, 2013

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.  
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

FILED  
m 11:10 a.m. GK  
OCT 01 2008 No cc  
S  
William A. Shaw  
Prothonotary/Clerk of Courts  
GIV

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

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 22<sup>nd</sup> 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:

Person Served, and  
Method of Service: Tuesday L. Passmore BY POSTING

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 25<sup>th</sup> day of August, 20 08  
Signature of Server Marilyn A. Campbell  
Notary Public (Commission Expires)

APS International, Ltd.

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 2<sup>nd</sup> 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.

*William J. Ammerman*  
Prothonotary/  
Clerk of Courts

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)

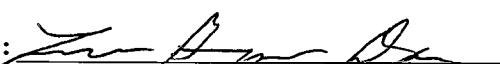
PRAECIPE TO FILE PROOF OF PUBLICATION

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 11/27/08, 11: 56  
OCT 01 2008 No cc  
S  
William A. Shaw  
Prothonotary/Clerk of Courts  
GLO

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA : SS:

COUNTY OF CLEARFIELD

On this 4th day of September, A.D. 2008, 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. Robison* COMMONWEALTH OF PENNSYLVANIA  
Notary Public  
Clearfield, Pa.  
Notarial Seal  
Charles J. Robison, Notary Public  
Clearfield Boro, Clearfield County  
My Commission Expires Oct. 31, 2011  
Member, Pennsylvania Association of Notaries

NOTICE OF ACTION  
IN MORTGAGE FORECLOSURE  
BETWEEN:  
COPMONPLEAS  
OF CLEARFIELD COUNTY,  
PA,  
PLAINTIFF  
AND  
CLOTH-ON-LAW  
08-493-CD

The City  
Group/Consumer Finance, Inc.,  
Plaintiff  
v.  
Tuesday Passmore and  
Levi Cole  
Defendants

NOTICE OF  
SHORT SALE  
OF REAL PROPERTY  
TO: Tuesday Passmore,  
Levi Cole  
374 River Road  
Clearfield, PA 16830  
Your house (real estate) at 374 River Road  
for Route 1000, Clearfield, PA 16830 is  
scheduled to be sold at the  
Sheriff's Sale on October 2008,  
at 10:00 AM, at the Clearfield  
County Courthouse, 1 North Second  
Street, Suite 116, Clearfield,  
PA 16830. The estimated amount  
of \$152,168.12, ob-  
tained by Plaintiff above (the mort-  
gage) against you. If the sale is  
postponed, the date will be in  
the notice of sale.

NOTICE OF SHORT SALE  
PROPERTY DESCRIPTION  
ALL that piece of parcel of land  
located in Lawrence Township, Clear-  
field County, Pennsylvania,  
bound and described as follows:  
BEGINNING at a point on the N. 1  
Joy Road, thence S 45° E, 100 feet  
thence East 40.82 perches  
to post, thence South 56° perches  
to post, thence North 33° perches  
to post, thence South 56° perches  
to road, thence along said township  
road its several courses to a  
point on the S. 1 Joy Road, thence  
North 75° E, 15 perches and 75 perches, more or  
less.

BEING known as Parcel  
#103-007-000-0004-B,  
EXCEPTING AND RELEASING  
therefrom a certain tract or lot of  
ground containing one (1) acre  
which was conveyed to the Mt. Joy  
Cemetery Association, a full de-  
scription of which is contained in  
a deed recorded in Deed  
Book 1064, Page 159.

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  
construction of Route No. 1009, more  
popularly known as Interstate 20  
Keystone, located in Lawrence  
Township, Clearfield County, and  
the premises acquired by the Common-  
wealth of Pennsylvania for the  
construction of Route No. 1009, Section No. 29  
Clearfield County, Pennsylvania  
from the Commonwealth of the  
Commonwealth of Pennsylvania on  
August 25, 1964.

ALSO, EXCEPTING AND RESER-  
VING that certain parcel of land  
previously conveyed by the Grant-  
ors herein by deed dated June 6,  
1971, recorded in Deed Book  
576 at Page 41, to Luther Ogden  
and Lee M. Land, and Esther  
Lund, and reserving the  
right of survivorship. Said parcel of  
land includes 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  
El-Sherif, dated March 27, 1993, and  
recorded in Deed Book 1064, Page  
159, to Lee M. Land, which  
Lee M. Land and Esther C. Lut-  
rich, her wife, by deed dated July  
15, 1971, recorded in Deed  
Book 576, Volume 577, Page 150,  
granted and conveyed to Lee M.  
Land and Esther C. Lutrich, her  
husband and wife, as tenants by the  
entireties.

NOTICE OF  
OWNER'S RIGHTS

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

1. The sale will be canceled if you  
pay the Sheriff the full amount  
of the bid price, less court  
costs, late charges, costs and re-  
sponsible attorney's fees. To find out  
how much you must pay, you may  
call (856) 669-5400.

2. You may also be able to stop the  
sale by filing a motion with the  
Court to open the sale if the  
judgment was impro-  
portionate. You may also ask the  
Court to postpone the sale for good  
cause.

3. You may also be able to stop  
the sale by filing a motion with the  
Court to set aside the sale if the bid  
price was grossly inadequate com-  
pared to the value of the property.

3. You may also stop the sale if  
the buyer pays the Sheriff the full  
amount of the sale. To find out if  
this has happened, you may call  
(856) 669-5400.

4. If the amount paid from the  
buyer to the Sheriff is less  
than the amount you owe  
the Sheriff, the Sheriff will  
return the difference to you  
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. If the  
Sheriff does not pay you, 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 distri-  
bution of the money paid  
will be filed by the Sheriff within 30  
days after the sale. This schedule  
will state who will be receiving your  
portion of the money and when it will be paid out  
in accordance with this schedule  
unless exceptions (reasons  
why the money paid for your house  
was not paid to the Sheriff) are filed with the Sheriff within ten  
(10) days after Schedule of Dis-  
tribution is filed.

7. You may also have other rights  
and defenses, or ways of getting  
your home back, if you act imme-  
diately.

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

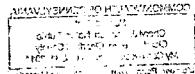
LAWYER GENERAL SERVICE  
David M. Melnick  
Court Administrator  
Clearfield County Courthouse  
111 WOODCHEST ROAD  
814-765-2641, Ext. 5982

ASSOCIATION  
OF LAWYERS  
David M. Melnick  
Court Administrator  
Clearfield County Courthouse  
111 WOODCHEST ROAD  
814-765-2641, Ext. 5982

MARK J. UDREN  
Attala, Udren & Plaintiff  
MARK J. UDREN

ASSOCIATED  
LAWYERS  
CORPORATE CENTER  
111 WOODCHEST ROAD  
CHERRY HILL, NJ 08003-3620

856-669-5400



might be necessary to remove a natural remedy of a teaspoon of olive oil to stimulate anal-gland contractions, and, in seven years, we return.

When I notice sluggish

immediate results.

Others will appreciate your

certainly worth trying on

and problems. Olive oil

is remarkable properties

and are good for animals!

I read your columns in

time. Usually, it's about

to know what you think

usual for a pet bird to

cockatiel, about 15 years

— he knows how to communicate easily.

should have serious care

time with my husband

like a zebra, not

his perch and staring

I respond to anything

nothing I tried. As soon

ime, the bird came back

again.

his behavior, very intel-

## years, Bi adlands

By Walker  
Press Writer  
PARK, S.D. (AP) —

out dig.

ly known as the Pig

ational Park will close

summer, 15 years after

unearthing prehis-

f the site is to better

re-preserved and how

lular setting.

unique here at the

site like it in the White

Shelton Benton, park pale-

June 1983 after two visi-

one sticking out of the

Picnic Area in what

a watering hole that

00 visitors have stopped

National Park Service

South Dakota School of

apid City remove sedi-

ments under a shelter

Scenic Byway, so it's

isn't have any dinosaur

in fossils of other crea-

on the first fossil that

be the remains of an

called Archaeotherium.

ture have been found at

determined the initial

ss rhinoceros called a

have been found at the

e-toed horses, tiny deer

a bobcat-sized saber-

toothed cat and a

ll

term: cumulative effects of

for concern.

DEAR DR. FOX: In

Norfolk, Va., whose minia-

to have impacted anal glan-

age. I had two situations t-

ret in which the surgery

should they reoccur. I refer

book that recommends

in the food daily to stimula-

I followed this advice

have yet to see the problem

I also give her probiotic

digestive aids and get

it, I, Norfolk, Va.

DEAR S.R.: Many read

natural remedy that is ef-

fective with chronic anal-gi-

and olive leaves have some

powerful antioxidants at

parts and skin.

DEAR DR. FOX: I have

ur newspaper for a long

ogs 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 amiable guy

verso and does a few things

and cleans his cage. They

A few years ago, my hu-

er surgery — twice. Each

was absent, the bird beca-

ating, just sitting out

straight ahead. He would

and seemed oblivious to all

is my husband returned to

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.

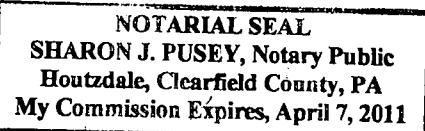


---

Gary A. Knaresboro, Esquire  
Editor

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

Sharon J. Pusey  
Notary Public  
My Commission Expires



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 2<sup>nd</sup> 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

Attest,

William A.  
Prothonotary/  
Clerk of Courts

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

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: 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 11:02 a.m. GK  
OCT 01 2008 NO C.C  
S  
William A. Shaw  
Prothonotary/Clerk of Courts  
(GIC)

| Line   | Article Number | Name of Addressee, Street, and Post Office Address                | Postage  | Fee | Handling Charge | Act. Value<br>(If Regis.) | Insured<br>Value | Check appropriate block for<br>Registered Mail;<br>With Postal Insurance |                                  |  | Affix stamp here if issued as<br>certificate of mailing or for<br>additional copies of this bill. | Postmark and Date of Receipt |
|--|----------------|---|--|-----|-----------------|---------------------------|------------------|--|----------------------------------|--|---|------------------------------|
|  |                |   |  |     |                 |                           |                  | <input type="checkbox"/> Registered                                      | <input type="checkbox"/> Insured | <input type="checkbox"/> Return Receipt for<br>Merchandise |   |                              |
| 1  |                | Tuesday L. Passmore<br>933 Old Turnpike Road<br>Allport, PA 16821 |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 2  |                | Tuesday L. Passmore<br>374 Pifer Road<br>Clearfield, PA 16830     |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 3  |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 4  |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 5  |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 6  |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 7  |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 8  |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 9  |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 10   |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 11   |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 12   |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 13   |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 14   |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| 15   |                |   |  |     |                 |                           |                  | <input type="checkbox"/>   | <input type="checkbox"/>         | <input type="checkbox"/>                                   |   |                              |
| Total number of Pieces<br>Listed by Sender   |                | Total Number of Pieces.....<br>Received at Post Office            | Postmaster, Per (Name of Receiving Post Office)<br>CHERRY HILL, NJ 08003 |     | AUG 19 2008     |                           | 016H26519216     |  | \$ 02.200<br>08/19/2008          |  | Mailed From 08003<br>US POSTAGE   |                              |
| <p>The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of non-negotiable 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.</p> |                |   |  |     |                 |                           |                  |  |                                  |  |   |                              |

PS Form 3877, February 1994

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

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

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

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

**OFFICIAL USE**

|   |         |
|---|---------|
| Postage   | \$ .42  |
| Certified Fee                                     | \$ .70  |
| Return Receipt Fee<br>(Endorsement Required)      | \$ .20  |
| Restricted Delivery Fee<br>(Endorsement Required) |         |
| Total Postage & Fees                              | \$ 5.32 |

Postmark  
Here

|                                    |                      |
|------------------------------------|----------------------|
| <i>Send To</i>                     | Tuesday L. Passmore  |
| Street, Apt. No.;<br>or PO Box No. | 374 Pifer Road       |
| City, State, ZIP+4                 | Clearfield, PA 16830 |

See Reverse for Instructions

PS Form 3800, August 2006

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



NOTICE OF SHERIFF'S SALE OF RE

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

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

Hasler

**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  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 0873 8919

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

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

## OFFICIAL USE

|   |         |
|---|---------|
| Postage   | \$ 42   |
| Certified Fee                                     | 2.70    |
| Return Receipt Fee<br>(Endorsement Required)      | 2.20    |
| Restricted Delivery Fee<br>(Endorsement Required) |         |
| Total Postage & Fees                              | \$ 5.32 |

Postmark  
Here

|  |   |
|--|---|
| Send To  | Tuesday L. Passmore<br>933 Old Turnpike Road<br>Allport, PA 16821 |
| Street, Apt. No.,<br>or PO Box No.<br>City, State, ZIP+4 |   |

See Reverse for Instructions

PS Form 3800, August 2006

2007 3020 0000 0873 896  
2007 3020 0000 0873 896



**CERTIFIED MAIL™**

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

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

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

Haster



**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.****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

**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 0873 8902

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

NO. 08-493-CD

## Defendants

ORDER

NOW, this 2<sup>nd</sup> 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

Attest,

William H. Prothonotary,  
Clerk of Courts

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

FILED  
m10/22/08  
OCT 08 2008  
NO CC  
G10

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 Praeclipe 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: 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.  
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

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

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 Praeclipe 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

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.  
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

**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<br>Or Sender              |                | 111 WOODCREST ROAD, SUITE 200<br>CHERRY HILL, NJ 08003   |   | ATTN: Amber D. Sandor   |     | UDREN LAW OFFICES, P.C. |                           | 111 WOODCREST ROAD, SUITE 200<br>CHERRY HILL, NJ 08003 |                         | ATTN: Amber D. Sandor |             |             |   |
|--|----------------|--|---|---|-----|-------------------------|---------------------------|--|-------------------------|-----------------------|-------------|-------------|---|
| Line                                       | Article Number | Name of Addressee, Street, and Post Office Address   |   | Postage   | Fee | Handling Charge         | Act. Value<br>(If Regis.) | Insured<br>Value<br>If COD                             | Due<br>Sender<br>If COD | R.R.<br>Fee           | S.D.<br>Fee | S.H.<br>Fee | Rst. Del. Fee   |
| 1  |                | COMMONWEALTH OF PA, DEPT. OF<br>REVENUE, BUREAU OF COMPLIANCE<br>PO Box 281230, Department of Revenue<br>Harrisburg, PA 17128-1230 |   |   |     |                         |                           |  |                         |                       |             |             | Affix stamp here if issued as<br>certificate of mailing or for<br>additional copies of this bill. |
| 2  |                | TENANTS/OCCUPANTS<br>374 Pifer Road<br>(Lawrence Township)<br>Clearfield, PA 16830   |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 3  |                | EUGENE SHADECK<br>1600 Potter Street<br>Karthaus, PA 16845   |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 4  |                | THE CIT GROUP/CONSUMER FINANCE<br>715 South Metropolitan Avenue, Suite 150<br>Oklahoma City, OK 73108                              |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 5  |                | REAL ESTATE TAX DEPARTMENT<br>1 North Second Street, Suite 116<br>Clearfield, PA 16830   |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 6  |                | DOMESTIC RELATIONS SECTION<br>1 North Second Street, Suite 116<br>Clearfield, PA 16830   |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 7  |                |  |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 8  |                |  |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 9  |                |  |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 10   |                |  |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 11   |                |  |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 12   |                |  |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 13   |                |  |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 14   |                |  |   |   |     |                         |                           |  |                         |                       |             |             |   |
| 15   |                |  |   |   |     |                         |                           |  |                         |                       |             |             |   |
| Total number of Pieces<br>Listed by Sender |                | Total Number of Pieces<br>Received at Post Office  | Postmaster, Re (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 \$500.00 per piece subject to a limit of \$500.00 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)

10/3/08

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: John J. Udren  
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.  
APS File #: 091517-0001

### AFFIDAVIT OF SERVICE -- Individual

Service of Process on:

**UDREN LAW OFFICES**

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

--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 22<sup>nd</sup> 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:

Person Served, and  
Method of Service: Tuesday L. Passmore BY POSTING

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 Subscribed and sworn to before me this  
that the foregoing is true and correct.

D.M. Ellis

Signature of Server

25<sup>th</sup> day of AUGUST, 20 08

Marilyn A. Campbell  
Notary Public  
(Commission Expires)

APS International, Ltd.

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**



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

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: Mark J. Udren  
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

**Plaintiff**

vs.

TUESDAY L. PASSMORE  
LEO W. COBLE

### Defendants

NO. 08-493-CD

## ORDER

NOW, this 2<sup>nd</sup> 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

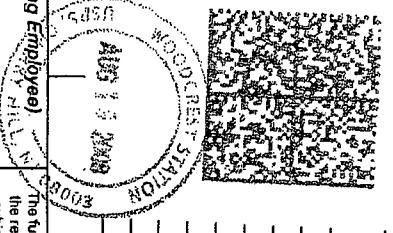
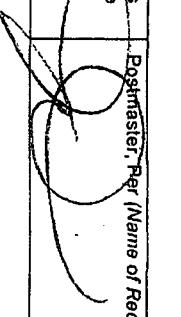
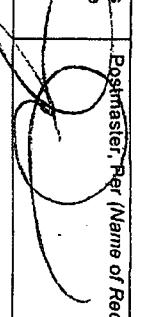
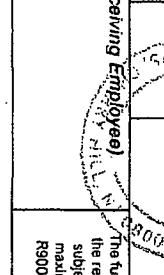
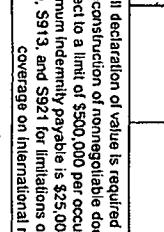
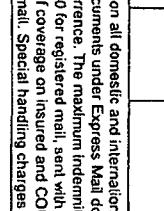
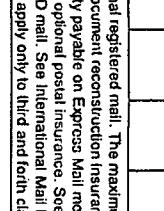
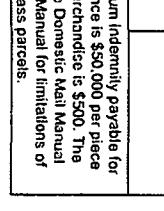
**FREDRIC J. AMMERMAN**  
President Judge 

Attest,

William E. Clark  
Prothonotary/  
Clark of Courts

MAY 28 2008

GERMAN  
**EXHIBIT B**

|  |                |   |  |  |  |   |   |               |                      |          |          |          |
|--|----------------|---|--|--|--|---|---|---------------|----------------------|----------|----------|----------|
| Name and Address Of Sender   |                | UDREN LAW OFFICES, P.C.<br>111 WOODCREST ROAD, SUITE 200<br>CHERRY HILL, NJ 08003<br>ATTN: Amber Sandor |  | <input type="checkbox"/> Registered<br><input type="checkbox"/> Insured<br><input type="checkbox"/> COD<br><input type="checkbox"/> Certified  | <input type="checkbox"/> Return Receipt for Merchandise<br><input type="checkbox"/> Int'l Recorded Del.<br><input type="checkbox"/> Express Mail | Check appropriate block for Registered Mail:<br><input type="checkbox"/> With Postal Insurance<br><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<br>(if Regis.)   | Insured Value | Due Sender<br>if COD | R.R. Fee | S.D. Fee | S.H. Fee |
| 1  |                | Tuesday L. Passmore<br>933 Old Turnpike Road<br>Allport, PA 16821                                       |  |  |  |   |   |               |                      |          |          |          |
| 2  |                | Tuesday L. Passmore<br>374 Pifer Road<br>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) | 016H26519216<br><b>\$02.200</b><br>08/19/2008<br>Mailed From 08003<br><b>US POSTAGE</b><br><br><br><br><br><br><br><br><br> |  |   |   |               |                      |          |          |          |
| 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)

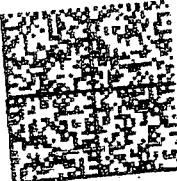
|  |   |
|--|---|
| <b>U.S. Postal Service<sup>TM</sup></b><br><b>CERTIFIED MAIL<sup>TM</sup> RECEIPT</b><br><i>(Domestic Mail Only, No Insurance Coverage Provided)</i> |   |
| For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>   |   |
| <b>OFFICIAL USE</b>  |   |
| Postage  | \$ .48  |
| Certified Fee  | \$ 2.70   |
| Return Receipt Fee<br>(Endorsement Required)   | \$ 2.20   |
| Restricted Delivery Fee<br>(Endorsement Required)  |   |
| Total Postage & Fees   | <b>\$ 5.38</b>  |
| Postmark   | Here  |
| Sent To  | Tuesday L. Passmore<br>374 Pifer Road<br>Clearfield, PA 16830 |
| <small>See reverse for instructions<br/>Rev. Form 3900, Aug. 22, 2006</small>  |   |

7007 3020 0000 0873 8929  
7007 3020 0000 0873 8929

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



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



Hagler

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 Mails or Priority Mails.
- Certified Mail is not available for any class of International mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuable items, 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 7550-02-000-9047

**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  |                     |
| <input checked="" type="checkbox"/> X <input type="checkbox"/> Agent<br><input type="checkbox"/> Addressee  |                     |
| B. Received by (Printed Name)   | C. Date of Delivery |
| D. Is delivery address different from item 1? <input type="checkbox"/> Yes<br>If YES, enter delivery address below: <input type="checkbox"/> No   |                     |
| E. Service Type   |                     |
| <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail<br><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise<br><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. |                     |
| F. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes  |                     |

2. Article Number  
(Transfer from service label)

7007 3020 0000 0873 8919

102595-02-M-1540

PS Form 3811, February 2004

Domestic Return Receipt

A8

EXHIBIT B

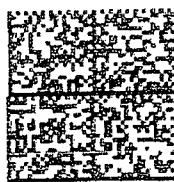
|  |         |
|--|---------|
| <b>U.S. Postal Service MAIL RECEIPT</b><br><i>(Domestic Mail Only; No Insurance Coverage Provided)</i> |         |
| For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>           |         |
| <b>OFFICIAL USE</b>  |         |
| Postage  | \$ 42   |
| Certified Fee  | 2.70    |
| Return Receipt Fee<br>(Endorsement Required)   | 2.20    |
| Restricted Delivery Fee<br>(Endorsement Required)  | 0.00    |
| Total Postage & Fees   | \$ 5.32 |
| <b>Send To</b><br>Street, Apt. No.<br>or PO Box No.<br>City, State, ZIP+4                              |         |
| Tuesday L. Passmore<br>933 Old Turnpike Road<br>Allport, PA 16821                                      |         |
| PS Form 3600, August 2006<br><small>See Reverse for Instructions.</small>                              |         |

LAW OFFICES, P.C.  
 100 CORPORATE CENTER  
 100 CREST ROAD  
 RY HILL, NJ 08003



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



Hasler

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

**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 valuable items, 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 381) to the article and add applicable postage to cover the fee. Enclose mailpiece "Return Receipt requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
  - If 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

**COMPLETE THIS SECTION ON DELIVERY**

**A. Signature**

□ Ac

Agent

**B. Received by (Printed Name)**

**C. Date of Delivery:**

D. Is delivery address different from Item 1?  Yes  
 No

**3. Service Type**

Certified Mail       Express Mail

Registered  Return

4 Printed Bill 0.00

Yes

**2. Article Number**  
*(Transfer from service label)*

Domestic Return Receipt

102595-02-M-1540

PS Form 3811 February 2004

Domestic Return Receipt

102595-02-M-1540

## EXHIBIT B

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 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 City  
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 Pifer 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 Second Street, Suite 116, Clearfield, PA 16830 to enforce the court judgment of \$152,168.32 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 situated 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 1.8 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. La-

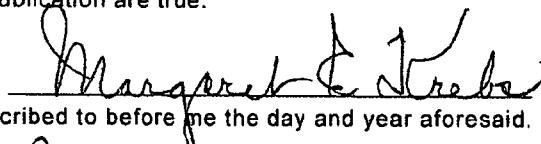
## PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :  
: SS:  
COUNTY OF CLEARFIELD :

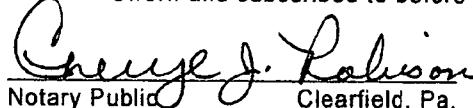
On this 4th day of September, A.D. 20 08, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Margaret E. Krebs, who being duly sworn according to law, deposes and says that she is the President of The Progressive Publishing Company, Inc., and Associate Publisher 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.



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. Lannich and Esther C. Lannich, 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. Meholic  
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. Melnick  
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

8:30-10-0

EXHIBIT B

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.)

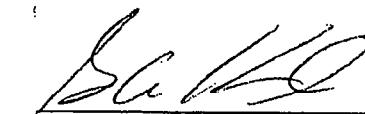
YOU MAY STILL BE ABLE TO SAVE  
YOUR PROPERTY AND YOU HAVE  
OTHER RIGHTS EVEN IF THE SHERIFF'S  
SALE DOES TAKE PLACE.

EXHIBIT B

## PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :  
:  
COUNTY OF CLEARFIELD :

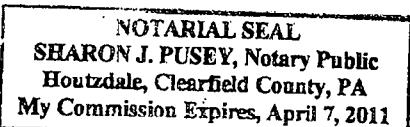
On this 5th day of September AD 2008, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement 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.

Sharon J. Pusey  
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

S  
FILED  
01/3/2009  
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 #7006081000045073992 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*  
By *Amber Bitter-Aufhauser*  
Chester A. Hawkins  
Sheriff

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

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 7/27/08 140.00 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) \$ \_\_\_\_\_

By Willie Morgan

Prothonotary

Clerk

Date 7/30/08

Received this writ this 30<sup>th</sup> day  
of July A.D. 2008  
At 8:00 A.M.P.M.

Robert A. Hawkins  
Sheriff by Amber S. Coughenour

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

Chandra Arkema

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 SERVICE                | 15.00             |
| MILEAGE                    | 15.00             |
| LEVY                       | 18.72             |
| MILEAGE                    | 15.00             |
| POSTING                    | 2.00              |
| CSDS                       | 15.00             |
| COMMISSION                 | 10.00             |
| POSTAGE                    | 1,780.00          |
| HANDBILLS                  | 18.46             |
| DISTRIBUTION               | 15.00             |
| ADVERTISING                | 25.00             |
| 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             |
| <b>TOTAL SHERIFF COSTS</b> | <b>\$2,074.18</b> |

**DEED COSTS:**

|                         |                   |
|-------------------------|-------------------|
| ACKNOWLEDGEMENT         | 5.00              |
| REGISTER & RECORDER     | 32.00             |
| TRANSFER TAX 2%         | 1,729.56          |
| <b>TOTAL DEED COSTS</b> | <b>\$1,761.56</b> |

**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                  |                     |
| <b>TOTAL DEBT AND INTEREST</b> | <b>\$160,087.62</b> |

**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            |
| <b>TOTAL COSTS</b>  | <b>\$8,362.77</b> |

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

C  
NO. 08-493-CD

O R D E R

NOW, this 2<sup>nd</sup> 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

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FREDRIC J. AMMERMAN  
President Judge

Attest.

William J. Ammerman  
Prothonotary/  
Clerk of Court

MAY 28 2008



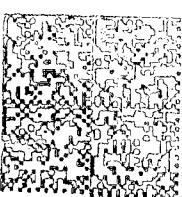


CHESTER A. HAWKINS  
SHERIFF

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



7006 0810 0001 4507 3992



0554855  
\$05.490  
05.25.2008  
Master  
Rated from 16830

US POSTAGE

TUESDAY L. PASSMORE  
633 OLD TURNPIKE ROAD  
ALLPORT, PA 16821

100-71-06

NIXIE

165 5E 1 72 08/27/08

RETURN TO SENDER  
NOT DELIVERABLE AS ADDRESSED  
UNABLE TO FORWARD

BC: 16830247201 \*0598-04073-27-25

16830247201

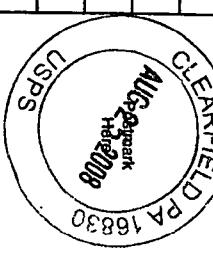
16830247201

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

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

OFFICIAL USE

| Postage                 | \$ 39   |
|-------------------------|---------|
| Certified Fee           |         |
| (Endorsement Required)  |         |
| Return Receipt Fee      |         |
| (Endorsement Required)  |         |
| Restricted Delivery Fee |         |
| (Endorsement Required)  |         |
| Total Postage & Fees    | \$ 5.49 |



7006 0810 0001 4507 3992

|                    |                       |
|--------------------|-----------------------|
| Street/ Apt. No.:  | TUESDAY L. PASSMORE   |
| or P.O. Box No.    | 933 OLD TURNPIKE ROAD |
| City, State, ZIP/4 | ALLPORT, PA 16821     |

**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

**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 3992

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540



CHESTER A. HAWKINS  
SHERIFF

1 NORTH SECOND STREET - SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830



7006 0810 0001 4507 4005



50¢  
\$05 490  
05/25/08  
Date sent 2008  
US POSTAGE

Rec  
8-26-08

*W*  
TUESDAY L. PASSMORE  
374 PIFER ROAD  
CLEARFIELD, PA 16830

1683002472

72 08/27/08

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

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

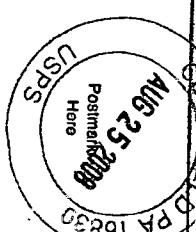
For delivery information visit our website at [www.usps.com](http://www.usps.com)®

OFFICIAL

|   |        |
|---|--------|
| Postage   | \$ 5.9 |
| Certified Fee                                     |        |
| Return Receipt Fee<br>(Endorsement Required)      |        |
| Restricted Delivery Fee<br>(Endorsement Required) |        |

Total Postage & Fees

\$ 5.49



|                                    |                      |
|------------------------------------|----------------------|
| Sent To                            | TUESDAY L. PASSMORE  |
| Street/ Apt. No.,<br>or PO Box No. | 374 PIFER ROAD       |
| City, State, Zip/4                 | CLEARFIELD, PA 16830 |

**CERTIFIED MAIL**PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE REVERSE ADDRESS FOLD AT DOTLINE**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

7006 0810 0001 4507 4005

2. Article Number  
(Transfer from service label)

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

**UDREN LAW OFFICES, P.C.**

WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 300  
CHERRY HILL, NEW JERSEY 08003-3620

856. 669. 5400

FAX: 856. 669. 5399

PENNSYLVANIA OFFICE  
715-368-9300

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 Stearns  
Foreclosure Manager

/kap