

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
DANIEL G. SCHMIEG, ESQ., Id. No. 62205  
MICHELE M. BRADFORD, ESQ., Id. No. 69849  
JUDITH T. ROMANO, ESQ., Id. No. 58745  
SHEETAL SHAH-JANI, ESQ., Id. No. 81760  
JENINE R. DAVEY, ESQ., Id. No. 87077  
LAUREN R. TABAS, ESQ., Id. No. 93337  
VIVEK SRIVASTAVA, ESQ., Id. No. 202331  
JAY B. JONES, ESQ., Id. No. 86657  
PETER MULCAHY, ESQ., Id. No. 61791  
ANDREW SPIVACK, ESQ., Id. No. 84439  
JAIME MCGUINNESS, ESQ., Id. No. 90134  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000 180603

Plaintiff

v.

CRYSTAL LEE LANAGER  
511 EAST 6TH STREET  
CLEARFIELD, PA 16830

Defendant

FILED pd \$95.00 Atty  
m/11:22am ICC Shff  
JUN 20 2008

William A. Shaw (SM)  
Prothonotary/Clerk of Courts

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 2008-1123-CD

CLEARFIELD COUNTY

**CIVIL ACTION - LAW**  
**COMPLAINT IN MORTGAGE FORECLOSURE**

## NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so, the case may proceed without you, and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral Service:  
Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
100 South Street  
PO Box 186  
Harrisburg, PA 17108  
800-692-7375

Notice to Defend:  
Daniel J. Nelson, Court Administrator  
Clearfield County Courthouse  
2<sup>nd</sup> and Market Streets  
Clearfield, PA 16830  
814-765-2641 x 5982

**IF THIS IS THE FIRST NOTICE THAT YOU HAVE  
RECEIVED FROM THIS OFFICE, BE ADVISED THAT:**

**PURSUANT TO THE FAIR DEBT COLLECTION  
PRACTICES ACT, 15 U.S.C. § 1692 et seq. (1977),  
DEFENDANT(S) MAY DISPUTE THE VALIDITY OF THE  
DEBT OR ANY PORTION THEREOF. IF DEFENDANT(S)  
DO SO IN WRITING WITHIN THIRTY (30) DAYS OF  
RECEIPT OF THIS PLEADING, COUNSEL FOR  
PLAINTIFF WILL OBTAIN AND PROVIDE  
DEFENDANT(S) WITH WRITTEN VERIFICATION  
THEREOF; OTHERWISE, THE DEBT WILL BE ASSUMED  
TO BE VALID. LIKEWISE, IF REQUESTED WITHIN  
THIRTY (30) DAYS OF RECEIPT OF THIS PLEADING,  
COUNSEL FOR PLAINTIFF WILL SEND DEFENDANT(S)  
THE NAME AND ADDRESS OF THE ORIGINAL  
CREDITOR, IF DIFFERENT FROM ABOVE.**

**THE LAW DOES NOT REQUIRE US TO WAIT UNTIL  
THE END OF THE THIRTY (30) DAY PERIOD  
FOLLOWING FIRST CONTACT WITH YOU BEFORE  
SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH  
THE LAW PROVIDES THAT YOUR ANSWER TO THIS**

**COMPLAINT IS TO BE FILED IN THIS ACTION WITHIN TWENTY (20) DAYS, YOU MAY OBTAIN AN EXTENSION OF THAT TIME. FURTHERMORE, NO REQUEST WILL BE MADE TO THE COURT FOR A JUDGMENT UNTIL THE EXPIRATION OF THIRTY (30) DAYS AFTER YOU HAVE RECEIVED THIS COMPLAINT. HOWEVER, IF YOU REQUEST PROOF OF THE DEBT OR THE NAME AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN THE THIRTY (30) DAY PERIOD THAT BEGINS UPON YOUR RECEIPT OF THIS COMPLAINT, THE LAW REQUIRES US TO CEASE OUR EFFORTS (THROUGH LITIGATION OR OTHERWISE) TO COLLECT THE DEBT UNTIL WE MAIL THE REQUESTED INFORMATION TO YOU. YOU SHOULD CONSULT AN ATTORNEY FOR ADVICE CONCERNING YOUR RIGHTS AND OBLIGATIONS IN THIS SUIT.**

**IF YOU HAVE FILED BANKRUPTCY AND RECEIVED A DISCHARGE, THIS IS NOT AN ATTEMPT TO COLLECT A DEBT. IT IS AN ACTION TO ENFORCE A LIEN ON REAL ESTATE.**

1. Plaintiff is

LASALLE BANK NATIONAL ASSOCIATION AS TRUSTEE  
1100 VIRGINIA DRIVE  
P.O. BOX 8300  
FORT WASHINGTON, PA 19034

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

CRYSTAL LEE LANAGER  
511 EAST 6TH STREET  
CLEARFIELD, PA 16830

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

3. On 12/27/2001 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to CHARTER BANK which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200120936. By Assignment of Mortgage recorded 03/24/2003 the mortgage was assigned to CHARTER BANK which Assignment is recorded in Assignment of Mortgage Instrument No. 200304570. The PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same. The mortgage and assignment(s), if any, are matters of public record and are incorporated herein by reference in accordance with Pa.R.C.P. 1019(g); which Rule relieves the Plaintiff from its obligations to attach documents to pleadings if those documents are of public record.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 03/01/2008 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$35,304.86
Interest	\$1,501.44
02/01/2008 through 06/18/2008	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$89.15
12/27/2001 to 06/18/2008	
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$38,695.45
Escrow	
Credit	\$0.00
Deficit	\$0.00
Subtotal	<u>\$0.00</u>
<b>TOTAL</b>	\$38,695.45

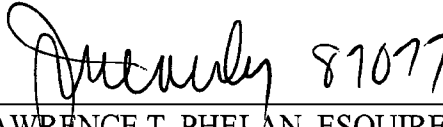
7. If the mortgage is reinstated prior to a Sheriff's Sale, the attorney's fee set forth above may be less than the amount demanded based on work actually performed. The attorney's fees requested are in conformity with the mortgage and Pennsylvania law. Plaintiff reserves its right to collect attorney's fees up to 5% of the remaining principal balance in the event the property is sold to a third party purchaser at Sheriff's Sale, or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.
8. Plaintiff is not seeking a judgment of personal liability (or an in personam judgment) against the Defendant(s) in the Action; however, Plaintiff reserves its right to bring a separate Action to establish that right, if such right exists. If Defendant(s) has/have received a discharge of personal liability in a bankruptcy proceeding, this Action of Mortgage Foreclosure is in no way an attempt to reestablish such personal liability discharged in bankruptcy, but only to foreclose the mortgage and sell the mortgaged premises pursuant to Pennsylvania Law.

9. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$38,695.45, together with interest from 06/18/2008 at the rate of \$10.88 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By: \_\_\_\_\_

 87077  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
DANIEL G. SCHMIEG, ESQUIRE  
MICHELE M. BRADFORD, ESQUIRE  
JUDITH T. ROMANO, ESQUIRE  
SHEETAL R. SHAH-JANI, ESQUIRE  
JENINE R. DAVEY, ESQUIRE  
LAUREN R. TABAS, ESQUIRE  
VIVEK SRIVASTAVA, ESQUIRE  
JAY B. JONES, ESQUIRE  
PETER MULCAHY, ESQUIRE  
ANDREW SPIVACK, ESQUIRE  
JAIME MCGUINNESS, ESQUIRE  
Attorneys for Plaintiff

## **LEGAL DESCRIPTION**

ALL that certain lot or piece of land situate in the Fourth Ward of the Borough of Clearfield, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at the corner of an alley and Sixth Street; thence north along said Sixth Street thirty (30) feet to post on line of land formerly of Mary Ann Swales and J. Thaddeus Swales, now of Walter L. Spriggle; thence along said line east two hundred (200) feet to an alley; thence south along said alley thirty (30) feet to an alley; thence along said alley west two hundred (200) feet to Sixth Street and place of beginning. BEING a part of two lots known on the Plan of Lots as 'A-1' and 'A-2', and being one-half of Lot 'A-2'. MAP #4.4-K08-246-00046

BEING the same premises conveyed by Judith A. Billotte, administratrix of the Sara B. Miles Estate, to Helen E. Albert, an individual, by deed dated May 3, 1995 and recorded May 3, 1995 in Clearfield County Record Book 1673, Page 308.

PARCEL # K08-246-00046

PROPERTY BEING – 511 EAST 6<sup>TH</sup> STREET

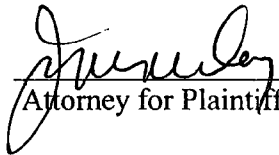


VERIFICATION

I hereby state that I am the attorney for Plaintiff in this matter, that Plaintiff is outside the jurisdiction of the Court and/or the verification could not be obtained within the time allowed for the filing of the pleading, that I am authorized to make this verification pursuant to Pa.R.C.P. 1024 (c), and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of my knowledge, information and belief.

Furthermore, counsel intends to substitute a verification from Plaintiff upon receipt.

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

 87077  
Attorney for Plaintiff

DATE: 6/18/08

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1123-CD

LASALLES BANK NATIONAL ASSOCIATION AS TRUSTEE  
vs  
CRYSTAL LEE LANAGER

SERVICE # 1 OF 1

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 07/20/2008

HEARING:

PAGE: 104303

DEFENDANT: CRYSTAL LEE LANAGER  
ADDRESS: 511 EAST 6TH ST.  
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

William A. Shaw  
Clerk of Courts

ATTEMPTS

6-25-08 JH

**SHERIFF'S RETURN**

NOW this 25<sup>th</sup> day of June 2008 AT 2:47 AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON CRYSTAL LEE LANAGER, DEFENDANT

BY HANDING TO Crystal L. Lanager, Def.

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

ADDRESS SERVED 511 E 6th St CLFD.

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM **POSTED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE FOR CRYSTAL LEE LANAGER

AT (ADDRESS) \_\_\_\_\_

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

I MAKE RETURN OF **NOT FOUND** AS TO CRYSTAL LEE LANAGER

REASON UNABLE TO LOCATE \_\_\_\_\_

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Deputy George F. DeHaven  
Deputy Signature

Deputy George F. DeHaven  
Print Deputy Name

PHELAN HALLINAN & SCHMIEG, LLP  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

LASALLE BANK NATIONAL  
ASSOCIATION AS TRUSTEE

Plaintiff

vs.

CRYSTAL LEE LANAGER

Defendant(s)


: COURT OF COMMON PLEAS  
:  
: CIVIL DIVISION  
:  
: NO. 2008-1123-CD  
:  
: CLEARFIELD COUNTY  
:  
:  
:

**PRAECIPE TO SUBSTITUTE VERIFICATION**  
**TO CIVIL ACTION COMPLAINT**  
**IN MORTGAGE FORECLOSURE**

TO THE PROTHONOTARY:

Kindly substitute the attached verification for the verification originally filed with the complaint in the instant matter.

Phelan Hallinan & Schmieg, LLP  
Attorney for Plaintiff

By:   
Francis S. Hallinan, Esquire

Date: 7/23/08

PHS #: 180603

**FILED**  
3/11/13  
JUL 25 2008  
CC  
(612)

William A. Shaw  
Prothonotary/Clerk of Courts

**VERIFICATION**

**Jeffrey Stephan**  
**Limited Signing Officer**

hereby states that he/she is

\_\_\_\_\_ of HOMECOMINGS FINANCIAL, LLC, servicing agent for Plaintiff in this matter, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

DATE:

7-7-08

Names: \_\_\_\_\_

**Jeffrey Stephan**  
Title: **Limited Signing Officer**

Company: HOMECOMINGS FINANCIAL,  
LLC

Loan: 7433541133

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

ATTORNEY FOR PLAINTIFF

**LASALLE BANK NATIONAL  
ASSOCIATION AS TRUSTEE**

**Plaintiff**

**vs.**

**CRYSTAL LEE LANAGER**

**Defendant(s)**

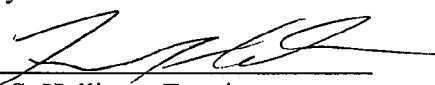
: **COURT OF COMMON PLEAS**  
:  
: **CIVIL DIVISION**  
:  
: **NO. 2008-1123-CD**  
:  
: **CLEARFIELD COUNTY**  
:  
:  
:

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Plaintiff's Praecipe to attach Verification of Complaint was sent via first class mail to the following on the date listed below:

CRYSTAL LEE LANAGER  
511 EAST 6TH STREET  
CLEARFIELD, PA 16830

Phelan Hallinan & Schmieg, LLP  
Attorney for Plaintiff

By:   
Francis S. Hallinan, Esquire

Date: 7/23/08

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

LASALLE BANK NATIONAL  
ASSOC. AS TRUSTEE,  
Plaintiff

vs.

CRYSTAL LEE LANAGER,  
Defendant

\*

\*

\*

\* NO.: 08-1123

\*

\* Type of Case: Civil

\*

\* Type of Pleading: Preliminary Objections

\*

\*

\* Filed on Behalf of: Defendant

\*

\* Counsel of Record for this Party:

\* Carl Mollica, Esquire

\*

\* Supreme Court No.: 41277

\*

\* MidPenn Legal Services

\* 2054 East College Avenue

\* State College, PA 16801

\* (814)238-4958 ext. 1126

FILED

AUG 01 2008

0/11:56 (u)

William A. Shaw  
Prothonotary/Clerk of Courts

3 cert to App

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY  
PENNSYLVANIA      CIVIL ACTION - LAW**

**LASALLE BANK NATIONAL ASSOC.  
AS TRUSTEE**

**Plaintiff**  
**Vs.**

**CRYSTAL LEE LANAGER  
511 EAST 6<sup>th</sup> STREET  
CLEARFIELD PA 16830  
Defendant**

**No.2008-1123-CD**

**Mortgage Foreclosure**

**PRELIMINARY OBJECTIONS**

**AND NOW, comes the Defendant, by and through her attorneys,  
MidPenn Legal Services, to file these Preliminary Objections to the  
Plaintiff's Complaint in Mortgage Foreclosure:**

**I.     Objection Raising Question of Failure of a Pleading to Conform to  
Rule of Court**

- 1.     The Plaintiff has filed its action as one in mortgage  
foreclosure.**
- 2.     The verification attached to the Complaint is signed by the  
Plaintiff's attorney. The Plaintiff's attorney avers in the verification that he  
signed for the Plaintiff because the Plaintiff is outside of the jurisdiction of  
the court and/or the verification could not be obtained within the time  
allowed for the pleading.**
- 3.     Defendant's counsel knows of no requirement under law or  
civil procedure, concerning a foreclosure matter, which would have  
created such an exigency or constraint of time that an officer or employee**

of the party plaintiff could not have verified the pleading as required by Pa.R.C.P. 1024(c).

4. The reasons given for not having the party sign do not meet the requirements of Rule 1024(c)(1) as the verification clearly implies that the Plaintiff has or is able to obtain all the information needed to enable it to verify the complaint.

5. The Plaintiff's complaint, therefore, fails to conform to rule of court and should be dismissed.

WHEREFORE, the Defendant respectfully requests this Honorable Court to dismiss the Plaintiff's Complaint and to provide any other and further relief to which the Court deems the Defendant entitled.

## **II. Nonjoinder of a Necessary Party/Lack of Standing to Sue**

6. At paragraph 3 of its complaint the Plaintiff indicates that it is the legal owner of the mortgage and is in the process of formalizing an assignment of the mortgage. The Plaintiff thereby admits that it had no assignment of the mortgage, which must be in writing, at the time the complaint was filed.

7. The Plaintiff was without standing to bring this action if it was not an assignee. If it was not an assignee then there has been a failure to join an indispensable party.



8. Further, the Plaintiff does not plead ownership of the note which underlies the mortgage recorded to secure it. The Plaintiff has no standing if the note has not been assigned to it.

WHEREFORE, the Defendant respectfully requests this Honorable Court to dismiss the Plaintiff's Complaint and to provide any other and further relief to which the Court deems the Defendant entitled.

Respectfully submitted,



---

MidPenn Legal Services  
By Carl Mollica, #41277  
2054 East College Avenue  
State College, PA 16801  
814-238-4958, ext. 1126  
800-326-9177

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

LASALLE BANK NATIONAL  
ASSOC. AS TRUSTEE,  
Plaintiff

vs.

CRYSTAL LEE LANAGER,  
Defendant

\*  
\*  
\*  
\* NO.: 08-1123  
\*  
\* Type of Case: Civil  
\*  
\* Type of Pleading: Certificate of Service  
\*  
\*  
\* Filed on Behalf of: Defendant  
\*  
\* Counsel of Record for this Party:  
\* Carl Mollica, Esquire  
\*  
\* Supreme Court No.: 41277  
\*  
\* MidPenn Legal Services  
\* 2054 East College Avenue  
\* State College, PA 16801  
\* (814)238-4958 ext. 1126

**FILED** 1cc  
0/3:27/34 Atty Mollica  
AUG 07 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

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

LASALLE BANK NATIONAL ASSOC.  
AS TRUSTEE

Plaintiff

Vs.

CRYSTAL LEE LANAGER  
511 EAST 6<sup>th</sup> STREET  
CLEARFIELD PA 16830  
Defendant

No.2008-1123-CD

Mortgage Foreclosure

CERTIFICATE OF SERVICE

I, Carl Mollica, Esq., counsel for Defendant, Crystal Lee Lanager, hereby certify that I served a true and correct copy of Defendant's Preliminary Objections to Plaintiff's Complaint via first-class, United States mail on the 5<sup>th</sup> day of August, 2008, addressed as follows:

Peter Mulcahy, Esq.  
Phelan, Hallinan & Schmieg LLP  
One Penn Center Plaza  
Suite 1400  
Philadelphia PA 19103

Respectfully submitted,

BY:



Carl Mollica, Esq.  
I.D. No. 41277  
MidPenn Legal Services, Inc.  
2054 East College Avenue  
State College PA 16801  
814 238-4958, ext 1126

FILED

AUG 07 2008

William A. Shaw  
Prothonotary/Clerk of Courts

IN SENATE  
JULY 11, 2008

REPORT OF THE  
COMMISSIONER OF THE  
DEPARTMENT OF REVENUE

FOR THE YEAR  
ENDING DECEMBER 31, 2007

ALBANY, N.Y.  
JULY 11, 2008

DEPARTMENT OF REVENUE

The Department of Revenue is pleased to present to you the report of the Commissioner for the year ending December 31, 2007. This report provides a summary of the Department's activities and accomplishments during the year.

During the year, the Department has continued to work closely with the Legislature and the public to ensure the efficient collection and distribution of state revenues. We have also implemented various initiatives to improve our services and reduce costs.

We look forward to continuing our efforts in the coming year.

W.A. Shaw

William A. Shaw  
Prothonotary/Clerk of Courts  
Department of Revenue  
Albany, New York

PHELAN HALLINAN & SCHMIEG, LLP  
BY: JENINE R. DAVEY, ESQUIRE  
Identification No.: 87077  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard, Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000  
LaSalle Bank National Association, as Trustee  
1100 Virginia Drive  
P.O. Box 8300  
Fort Washington, PA 19034

Plaintiff

ATTORNEY FOR PLAINTIFF

Court of Common Pleas  
Civil Division  
Clearfield County  
No.: 2008-1123-CD

vs.

Crystal Lee Lanager  
511 East 6<sup>th</sup> Street  
Clearfield, PA 16830

Defendant

**FILED** ICC & 1 Cert  
m/12:00pm of d.sc issued  
SEP - 8 2008 to Atty Davey

**PRAECIPE TO WITHDRAW COMPLAINT**

William A. Shaw  
Prothonotary/Clerk of Courts  
Copy to CIA

TO THE PROTHONOTARY:

Please withdraw the Complaint and mark the case Discontinued and Ended without prejudice in the above referenced case

Date:

9/3/08

Jenine R. Davey, Esquire  
Attorney for Plaintiff

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

**CIVIL DIVISION**

COPY

**LaSalle Bank National Association**

**Vs.**

**No. 2008-01123-CD**

**Crystal Lee Lanager**

**CERTIFICATE OF DISCONTINUATION**

Commonwealth of PA  
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on September 8, 2008, marked:

Withdraw the Complaint and mark the case Discontinued and ended without prejudice

Record costs in the sum of \$95.00 have been paid in full by Jenine R. Davey Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 8th day of September A.D. 2008.

 LM

William A. Shaw, Prothonotary

PHELAN HALLINAN & SCHMIEG, LLP

BY: JENINE R. DAVEY, ESQUIRE

Identification No.: 87077

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

LaSalle Bank National Association, as Trustee

1100 Virginia Drive

P.O. Box 8300

Fort Washington, PA 19034

Plaintiff

ATTORNEY FOR PLAINTIFF

Court of Common Pleas

Civil Division

Clearfield County

No.: 2008-1123-CD

vs.

Crystal Lee Lanager

511 East 6<sup>th</sup> Street

Clearfield, PA 16830

Defendant

**CERTIFICATION OF SERVICE**

I hereby certify a true and correct copy of the foregoing Plaintiff's Praecept to Withdraw Complaint was served by regular mail on counsel for Defendant on the date listed below:

Carl Mollica, Esquire

MidPenn Legal Services

2054 East College Avenue

State College, PA 16801

DATE: 9/3/08

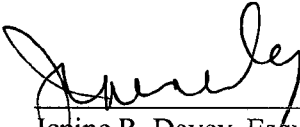
**FILED**

m/12:00Lm

SEP - 8 2008

William A. Shaw

Prothonotary/Clerk of Courts

  
Jenine R. Davey, Esquire  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104303  
NO: 08-1123-CD  
SERVICES 1  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: LASALLES BANK NATIONAL ASSOCIATION AS TRUSTEE  
vs.  
DEFENDANT: CRYSTAL LEE LANAGER

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	705860	10.00
SHERIFF HAWKINS	PHELAN	705860	20.00

FILED  
012:5534  
OCT 03 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

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

So Answers,



Chester A. Hawkins  
Sheriff