

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

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

Plaintiff
v.

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

Defendant

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

FILED pd \$95.00 Atty
m/jl:adm ICC Shft
JUN 20 2008

William A. Shaw
Prothonotary/Clerk of Courts

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION
TERM

NO. 2008-1123-CJ
CLEARFIELD COUNTY

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
2nd and Market Streets
Clearfield, PA 16830
814-765-2641 x 5982

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

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

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

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

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

1. Plaintiff is

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 02/01/2008 through 06/18/2008	\$1,501.44
Attorney's Fees	\$1,250.00
Cumulative Late Charges 12/27/2001 to 06/18/2008	\$89.15
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>
TOTAL	\$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:  81077

LAURENCE 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 6TH 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.



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 J.W.

FILED

07/25/08
JUN 25 2008

J.W.

SHERIFF'S RETURN

NOW, this 25th 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 CFP.

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. DeHaen
Deputy Signature

Deputy George F. DeHaen
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**

: COURT OF COMMON PLEAS

: CIVIL DIVISION

Plaintiff

: NO. 2008-1123-CD

vs.

: CLEARFIELD COUNTY

CRYSTAL LEE LANAGER

:

Defendant(s)

:

:

PRAEICE 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
M 11/13/08
JUL 25 2008
610

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

Name: Jeffrey Stephan
Title: Limited Signing Officer

Company: HOMECOMINGS FINANCIAL,
LLC

Loan: 7433541133

File #: 180603

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**

COURT OF COMMON PLEAS

Plaintiff

CIVIL DIVISION

vs.

NO. 2008-1123-CD

CRYSTAL LEE LANAGER

CLEARFIELD COUNTY

Defendant(s)

:

:

:

:

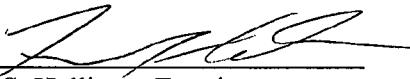
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CERTIFICATE OF SERVICE

I hereby certify that a strue 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

01115676

William A. Shaw

Prothonotary/Clerk of Courts

3 CERT TO ATT

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

LASALLE BANK NATIONAL ASSOC.	:	No.2008-1123-CD
AS TRUSTEE	:	
	:	
Plaintiff	:	Mortgage Foreclosure
Vs.	:	
	:	
CRYSTAL LEE LANAGER	:	
511 EAST 6 th STREET	:	
CLEARFIELD PA 16830	:	
Defendant	:	

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,

Carl Mollica 114
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
03-27-08
AUG 07 2008
WAS
William A. Shaw
Prothonotary/Clerk of Courts

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

LASALLE BANK NATIONAL ASSOC. : No.2008-1123-CD
AS TRUSTEE

Plaintiff : Mortgage Foreclosure
Vs.

CRYSTAL LEE LANAGER
511 EAST 6th STREET
CLEARFIELD PA 16830
Defendant

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 5th 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

CLERK OF THE COURT FOR THE STATE OF PENNSYLVANIA
MAIL CENTER 2000, 2015 MARKET ST., PHILADELPHIA, PA 19103

RECEIVED

CLERK OF THE COURT FOR THE STATE OF PENNSYLVANIA
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CLERK OF THE COURT FOR THE STATE OF PENNSYLVANIA
MAIL CENTER 2000, 2015 MARKET ST., PHILADELPHIA, PA 19103

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CLERK OF THE COURT FOR THE STATE OF PENNSYLVANIA
MAIL CENTER 2000, 2015 MARKET ST., PHILADELPHIA, PA 19103

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 6th Street
Clearfield, PA 16830

Defendant

FILED 1CC & 1Cmt
m/12:00pm of 12/08/2008
SEP - 8 2008 to Atty Davey

William A. Shaw
Prothonotary/Clerk of Courts

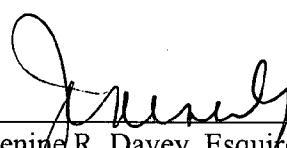
Copy to CIA

PRAECIPE TO WITHDRAW COMPLAINT

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.
Crystal Lee Lanager

No. 2008-01123-CD

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 6th Street
Clearfield, PA 16830

Defendant

CERTIFICATION OF SERVICE

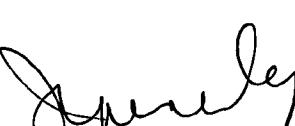
I hereby certify a true and correct copy of the foregoing Plaintiff's Praeclipe to Withdraw Complaint was served by regular mail on counsel for Defendant on the date listed below:

Carl Mollica, Esquire
MidPenn Legal Services
2054 East College Avenue
State College, PA 16801

DATE: 9/3/08

FILED 1 CC Atty
m/12/00Lm Davey
SEP - 8 2008
LAW

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
02.55.04
OCT 03 2008
S
William A. Shaw
Prothonotary/Clerk of Courts
WAS

Sworn to Before Me This

So Answers,

Day of _____ 2008



Chester A. Hawkins
Sheriff