

08-1808-CD
Deutsche Bank vs Jeanne Anderson

FILED *Atty pd. \$95.00*
SEP 24 2008 *2ccs sheriff*
William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 52695
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 _____ 187204

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST COMPANY, COURT OF COMMON PLEAS
AS TRUSTEE, FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED CERTIFICATES SERIES CIVIL DIVISION
2006-2
3476 STATEVIEW BLVD
FORT MILL, SC 29715

TERM

NO. 08-1808-CD

CLEARFIELD COUNTY

Plaintiff

v.

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

Defendant

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
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

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST ASSET-BACKED CERTIFICATES SERIES
2006-2
3476 STATEVIEW BLVD
FORT MILL, SC 29715

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

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

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

3. On 11/17/2005 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to CENTEX HOME EQUITY COMPANY, LLC which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200520299. By Assignment of Mortgage recorded 12/14/2007 the mortgage was assigned to PLAINTIFF which Assignment is recorded in Assignment of Mortgage Instrument No. 200720505. 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 06/01/2008 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	\$80,809.88
Interest	\$3,121.74
05/01/2008 through 09/19/2008	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$233.72
11/17/2005 to 09/19/2008	
Property Inspections	\$30.00
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$85,995.34
Escrow	
Credit	\$0.00
Deficit	\$826.43
Subtotal	<u>\$826.43</u>
TOTAL	\$86,821.77

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. The action does not come under Act 6 of 1974 because the original mortgage amount exceeds the dollar amount provided in the statute.
10. The mortgage premises are vacant and abandoned.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$86,821.77, together with interest from 09/19/2008 at the rate of \$22.14 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: 

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 86657
PETER MULCAHY, ESQUIRE
ANDREW SPIVACK, ESQUIRE
JAIME MCGUINNESS, ESQUIRE

Attorneys for Plaintiff

LEGAL DESCRIPTION

ALL that certain tract of land designated as Section 10, Lot 59, in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Clearfield County Recorder's Office.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declaration of Restrictions, Treasure Lake, Inc. recorded in Misc. Book Vol. 146, p. 476; all of said restrictions being covenants which run with the land.
3. All minerals and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Treasure Lake Property Owners Association, Inc.; which lien shall run with the land and be an encumbrance against it.

BEING the same premises conveyed by deed of Bessie L. Dubbs, widow, to Randy L. Anderson and Jeanne M. Anderson, husband and wife, dated December 31, 1997, and recorded in the Office of the Recorder of Deeds of Clearfield County in Volume 1899, page 358.

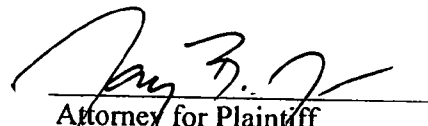
PARCEL NO: 1280-C02-010-00059-00-21
PROPERTY ADDRESS: **924 TREASURE LAKE**

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
ID. 86657

DATE: 9.19.08

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1808-CD

DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee
vs
JEANNE M. ANDERSON

SERVICE # 2 OF 2

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 10/24/2008 HEARING: PAGE: 104703

DEFENDANT: JEANNE M. ANDERSON
ADDRESS: 924 TREASURE LAKE
DUBOIS, PA 15801

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

(CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:)

VACANT

OCCUPIED

ATTEMPTS

371-0798

Sec 10 Lot 59 Lane

10-6-08 House VACANT - NOT HOME @ Sher De Lin.

SHERIFF'S RETURN

NOW, 10-17-08 AT 11:20 AM PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON JEANNE M. ANDERSON, DEFENDANT

BY HANDING TO Jeanne Anderson, Defendant

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

ADDRESS SERVED Progressive Business 51 Delaware Ave, DuBois, Pa. 15801

NOW AT AM / PM POSTED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE FOR JEANNE M. ANDERSON

AT (ADDRESS)

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

I MAKE RETURN OF NOT FOUND AS TO JEANNE M. ANDERSON

REASON UNABLE TO LOCATE

SWORN TO BEFORE ME THIS

DAY OF 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Jerome M. Neri
Deputy Signature

Jerome M. Neri
Print Deputy Name

FILED
03/13/09
OCT 17 2008
William A. Shaw
Prothonotary/Clerk of Courts

Phelan Hallinan & Schmieg, LLP
By: Daniel G. Schmieg, Esquire
Identification No. 62205
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
215-563-7000

FILED

Any pd. \$20.00
11/21/08
JAN 13 2009

5 William A. Shaw
Prothonotary/Clerk of Courts

1cc - Notice to Def. (at each of 3 addresses)
Statement to Atty (Cil)

Attorney for Plaintiff

**DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR SOUNDVIEW
HOME LOAN TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2**

: **CLEARFIELD COUNTY**
:
: **COURT OF COMMON PLEAS**
:
: **CIVIL DIVISION**
:
: **No. 08-1808-CD**
:
:

vs.

**JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023**

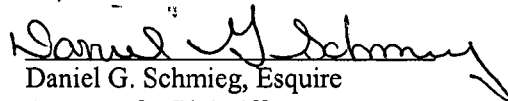
**PRAECIPE FOR IN REM JUDGMENT FOR FAILURE TO
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against **JEANNE M. ANDERSON**, Defendant(s) 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	\$86,821.77
Interest - 09/24/2008 to 01/08/2009	<u>\$2,368.98</u>
TOTAL	\$89,190.75

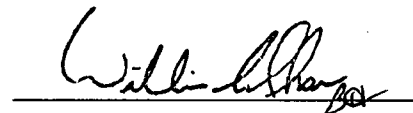
I hereby certify that (1) the addresses of the Defendant(s) are as shown above, and (2) that notice has been given in accordance with Rule 237.1, copy attached.


Daniel G. Schmieg, Esquire
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 1/13/09

PHS # 187204



PRO PROTHY

PHELAN HALLINAN & SCHMIEG, LLP
By: LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR SOUNDVIEW
HOME LOAN TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

COURT OF COMMON PLEAS
CIVIL DIVISION

NO. 08-1808-CD

Plaintiff

CLEARFIELD COUNTY

v.

JEANNE M. ANDERSON

Defendant

TO: JEANNE M. ANDERSON
378 Sher De Lin Road
Du Bois, PA 15801

FILE COPY

DATE OF NOTICE: December 24, 2008


THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

IMPORTANT NOTICE

You are in default because you have failed to enter a written appearance personally or by attorney and file in writing with the court your defenses or objections to the claims set forth against you. Unless you act within ten (10) days from the date of this notice, a Judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to a lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
100 South Street
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Daniel J. Nelson
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641


JASON RICCO
Legal Assistant

PHELAN HALLINAN & SCHMIEG, LLP
By: LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR SOUNDVIEW
HOME LOAN TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

COURT OF COMMON PLEAS
CIVIL DIVISION

NO. 08-1808-CD

Plaintiff

CLEARFIELD COUNTY

v.

JEANNE M. ANDERSON

Defendant(s)

TO: JEANNE M. ANDERSON
PROGRESSIVE BUSINESS
51 DELAWARE AVENUE
DUBOIS, PA 15801

FILE 6077

DATE OF NOTICE: December 24, 2008

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

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Daniel J. Nelson
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641


JASON RICCO
Legal Assistant

PHELAN HALLINAN & SCHMIEG, LLP
By: LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR SOUNDVIEW
HOME LOAN TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

COURT OF COMMON PLEAS
CIVIL DIVISION

NO. 08-1808-CD

Plaintiff

CLEARFIELD COUNTY

v.
JEANNE M. ANDERSON

Defendant(s)

TO: JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

FILE COPY

DATE OF NOTICE: December 24, 2008

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

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100 South Street
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Daniel J. Nelson
Court Administrator
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641


JASON RICCO
Legal Assistant

Phelan Hallinan & Schmieg, LLP
By: Daniel G. Schmieg, Esquire
Identification No. 62205
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
215-563-7000

Attorney for Plaintiff

**DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST ASSET-
BACKED CERTIFICATES SERIES 2006-2**

**: CLEARFIELD COUNTY
:
: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: No. 08-1808-CD
:**

vs.

JEANNE M. ANDERSON


VERIFICATION OF NON-MILITARY SERVICE

Daniel G. Schmieg, Esquire, hereby verifies that he is attorney for the Plaintiff in the above-captioned matter, and that on information and belief, he has knowledge of the following facts, to wit:

(a) that the defendant(s) is/are not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of Congress of 1940, as amended.

(b) that defendant JEANNE M. ANDERSON is over 18 years of age and resides at 924 TREASURE LAKE, DUBOIS, PA 15801-9023.

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


Daniel G. Schmieg, Esquire
Attorney for Plaintiff

(Rule of Civil Procedure No. 236) – Revised

COPY

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR SOUNDVIEW
HOME LOAN TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

vs.

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

: CLEARFIELD COUNTY
:
: COURT OF COMMON PLEAS
:
:
: CIVIL DIVISION
:
: No. 08-1808-CD
:
:

Notice is given that a Judgment in the above captioned matter has been entered
against you on January 13, 2009

By: William H. Hays DEPUTY

If you have any questions concerning this matter please contact:

Daniel G. Schmieg
Daniel G. Schmieg, Esquire
Attorney or Party Filing
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
215-563-7000

**** THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. IF YOU
HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS IS NOT AND
SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT
ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY. ****

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

Deutsche Bank National Trust Company
Plaintiff(s)

No.: 2008-01808-CD

Real Debt: \$89,190.75

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Jeanne M. Anderson
Defendant(s)

Entry: \$20.00

Instrument: In Rem Judgment

Date of Entry: January 13, 2009

Expires: January 13, 2013

Certified from the record this 13th day of January, 2009.



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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1808-CD

DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee
vs
JEANNE M. ANDERSON

SERVICE # 1 OF 2

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 10/24/2008 HEARING: PAGE: 104703

DEFENDANT: JEANNE M. ANDERSON
ADDRESS: 378 SHER DE LIN ROAD
DUBOIS, PA 15801

- Mome's 25

590-8742

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS 10-01-08 N/A 10-06-08 11:08 AM - N/A

FILED
0134309
OCT 17 2008
William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF'S RETURN

NOW, 10-17-08 AT 11:20 AM PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON JEANNE M. ANDERSON, DEFENDANT

BY HANDING TO Jeanne Anderson, Defendant

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

ADDRESS SERVED Progressive Business 51 Delaware Ave Dubois, PA - 15801

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE FOR JEANNE M. ANDERSON

AT (ADDRESS) _____

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

I MAKE RETURN OF NOT FOUND AS TO JEANNE M. ANDERSON

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: Jerome M. Verdine
Deputy Signature

Jerome M. Verdine
Print Deputy Name

FILED

OCT 31 2008

12:10/a

William A. Shaw

Prothonotary/Clerk of Courts

W.A. Shaw C/C ETO

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

DEUTSCHE BANK NATIONAL
TRUST COMPANY, AS TRUSTEE,
FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

: COURT OF COMMON PLEAS

:

: CIVIL DIVISION

:

: NO. 08-1808-CD

:

Plaintiff

: CLEARFIELD COUNTY

:

vs.

:

:

JEANNE M. ANDERSON

:

Defendant(s)

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
Francis S. Hallinan, Esquire

Date: 10/29/08

PHS #: 187204

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

DEUTSCHE BANK NATIONAL
TRUST COMPANY, AS TRUSTEE,
FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

Plaintiff

vs.

JEANNE M. ANDERSON

: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: NO. 08-1808-CD
:
: CLEARFIELD COUNTY
:
:
:
:

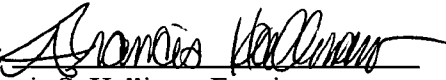
Defendant(s)

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:

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

Phelan Hallinan & Schmieg, LLP
Attorney for Plaintiff

By: 
Francis S. Hallinan, Esquire

Date: 10/29/08

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104703
NO: 08-1808-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, As Trustee
vs.
DEFENDANT: JEANNE M. ANDERSON

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	734128	20.00
SHERIFF HAWKINS	PHELAN	734128	80.00

FILED
8/3:30am
JAN 15 2009

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

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

DEUTSCHE BANK NATIONAL
TRUST COMPANY, AS TRUSTEE,
FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

vs.

JEANNE M. ANDERSON

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No. 08-1808-CD

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

To the PROTHONOTARY:

Issue writ of execution in the above matter:

Amount Due

\$89,190.75

Prothonotary costs 135.00

\$ _____

Interest from 1/9/09 to Sale

Per diem \$14.66

Add'l Costs

\$2,880.00

Writ Total

\$


DANIEL G. SCHMIEG, ESQUIRE

Attorney for Plaintiff

Note: Please attach description of Property.

187204

FILED

FEB 11 2009

William A. Shaw
Prothonotary/Clerk of Courts

Att'y pd.
20.00

ICC @ 6 w/rits

w/prop desc.
to Sheriff

(610)

No. 08-1808-CD.....

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

FILED

FEB 11 2009


DEUTSCHE BANK NATIONAL TRUST COMPANY, William A. Shaw
AS TRUSTEE, FOR SOUNDVIEW HOME LOAN Prothonotary/Clerk of Courts
TRUST ASSET-BACKED CERTIFICATES SERIES
2006-2

vs.

JEANNE M. ANDERSON

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed:


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Address: JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

PHELAN HALLINAN & SCHMIEG
By: DANIEL G. SCHMIEG
Identification No. 62205
Suite 1400
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST ASSET-
BACKED CERTIFICATES SERIES 2006-2
3476 STATEVIEW BOULEVARD
FORT MILL, SC 29715

Plaintiff,

v.

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

Defendant(s).

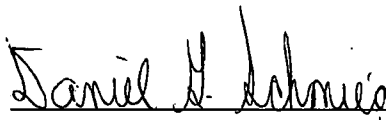
:
:
: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: NO. 08-1808-CD
:
:
:
:
:

CERTIFICATION

DANIEL G. SCHMIEG, ESQUIRE, hereby states that he is 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 Mortgage
() non-owner occupied
(X) vacant
() Act 91 procedures have been fulfilled

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



DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST ASSET-
BACKED CERTIFICATES SERIES 2006-2
3476 STATEVIEW BOULEVARD
FORT MILL, SC 29715

Plaintiff,

v.

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

Defendant(s).

CLEARFIELD COUNTY
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 08-1808-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

**DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST ASSET-BACKED CERTIFICATES SERIES 2006-2**, Plaintiff in
the above action, by its attorney, DANIEL G. SCHMIEG, ESQUIRE, sets forth as of the date the Praecipe for
the Writ of Execution was filed, the following information concerning the real property located at **924
TREASURE LAKE, DUBOIS, PA 15801-9023**.

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

NAME

LAST KNOWN ADDRESS (If address cannot
be reasonably ascertained, please so indicate.)

JEANNE M. ANDERSON

924 TREASURE LAKE
DUBOIS, PA 15801-9023

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

NAME


LAST KNOWN ADDRESS (If address cannot
be reasonably ascertained, please so indicate.)

Same as Above

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

FEBRUARY 10, 2009

Date


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST ASSET-
BACKED CERTIFICATES SERIES 2006-2
3476 STATEVIEW BOULEVARD
FORT MILL, SC 29715

Plaintiff,

v.

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

Defendant(s).

CLEARFIELD COUNTY
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 08-1808-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

**DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST ASSET-BACKED CERTIFICATES SERIES 2006-2**, Plaintiff in
the above action, by its attorney, DANIEL G. SCHMIEG, ESQUIRE, sets forth as of the date the Praecipe for
the Writ of Execution was filed, the following information concerning the real property located at **924
TREASURE LAKE, DUBOIS, PA 15801-9023**.

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

NAME

LAST KNOWN ADDRESS (If address cannot
be reasonably ascertained, please so indicate.)

None

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

NAME

LAST KNOWN ADDRESS (If address cannot
be reasonably ascertained, please so indicate.)

None

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

NAME

LAST KNOWN ADDRESS (If address cannot
be reasonably ascertained, please so indicate.)

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

LAST KNOWN ADDRESS (If address cannot
be reasonably ascertained, please so indicate.)

None

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

NAME	LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
------	---

TENANT/OCCUPANT	924 TREASURE LAKE DUBOIS, PA 15801-9023
-----------------	--

DOMESTIC RELATIONS CLEARFIELD COUNTY	CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830
---	--

COMMONWEALTH OF PENNSYLVANIA	DEPARTMENT OF WELFARE PO BOX 2675 HARRISBURG, PA 17105
---------------------------------	--

Commonwealth of Pennsylvania Bureau of Individual Tax Inheritance Tax Division	6 th Floor, Strawberry Sq., Dept 28061 Harrisburg, PA 17128
--	---

Internal Revenue Service Federated Investors Tower	13 TH Floor, Suite 1300 1001 Liberty Avenue Pittsburgh, PA 15222
---	---

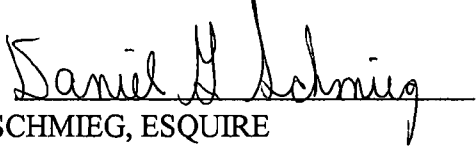
Department of Public Welfare TPL Casualty Unit Estate Recovery Program	P.O. Box 8486 Willow Oak Building Harrisburg, PA 17105
--	--

TREASURE LAKE PROERTY OWNERS	13 TREASURE LAKE DUBOIS, PA 15801
------------------------------	--------------------------------------

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

FEBRUARY 10, 2009

Date


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

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

COPY

DEUTSCHE BANK NATIONAL
TRUST COMPANY, AS TRUSTEE,
FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No.
No. 08-1808-CD
No.

WRIT OF EXECUTION
(Mortgage Foreclosure)

vs.

JEANNE M. ANDERSON

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

PREMISES: 924 TREASURE LAKE, DUBOIS, PA 15801-9023
(See Legal Description attached)

Amount Due

Interest from 1/9/09 to Sale
Per diem \$14.66
Add'l Costs
Writ Total

Prothonotary costs \$89,190.75
135.00
\$ _____

\$2,880.00

\$


OFFICE OF THE PROTHONOTARY OF CLEARFIELD
COUNTY, PENNSYLVANIA

Dated 2/11/09
(SEAL)

No. 08-1808-CD.....

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE, FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED CERTIFICATES SERIES
2006-2

vs.

JEANNE M. ANDERSON

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Real Debt \$89,190.75

Int. from 1/9/09

To Date of Sale (\$14.66 per diem)

Costs

Prothy Pd.

135.00

Sheriff

Daniel G. Schmieg

DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Address: JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

LEGAL DESCRIPTION

Sandy Township, Clearfield County, Pennsylvania, recorded in the Clearfield County Recorder's Office.

EXCEPTING AND RESERVING therefrom and subject to:

- 1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.**
- 2. The Declaration of Restrictions, Treasure Lake, Inc. recorded in Misc. Book Vol. 146, p. 476; all of said restrictions being covenants, which run with the land.**
- 3. All minerals and mining rights of every kind and nature.**
- 4. A lien for all unpaid charges or assessments as may be made by Treasure Lake Property Owners Association, Inc.; which lien shall run with the land and be an encumbrance against it.**

BEING the same premises conveyed by deed of Bessie L. Dubbs, widow, to Randy L. Anderson and Jeanne M. Anderson, husband and wife, dated December 31, 1997, and recorded in the Office of the Recorder of Deeds of Clearfield County in Volume 1899, page 358.

TITLE TO SAID PREMISES IS VESTED IN Jeanne M. Anderson, a widow, by Deed from Jeanne M. Anderson, a widow, dated 07/12/2004, recorded 07/16/2004 in Instrument Number 200411524.

**Premises being: 924 TREASURE LAKE
DUBOIS, PA 15801-9023**

Tax Parcel No. 1280-C02-010-00059-00-21

17

FILED ^{NOCC}
MAR 19 2009
William A. Shaw
Prothonotary/Clerk of Courts

5

610

CA

PHELAN HALLINAN & SCHMIEG, LLP
by: Michele M. Bradford, Esquire
Atty. I.D. No. 69849
One Penn Center, Suite 1400
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST	:	Court of Common Pleas
COMPANY, AS TRUSTEE, FOR SOUNDVIEW	:	
HOME LOAN TRUST ASSET-BACKED	:	Civil Division
CERTIFICATES SERIES 2006-2	:	
Plaintiff	:	CLEARFIELD County
	:	
v.	:	No. 08-1808-CD
	:	
JEANNE M. ANDERSON	:	
Defendant	:	

PLAINTIFF'S MOTION TO REASSESS DAMAGES

Plaintiff, by its Attorney, Michele M. Bradford, Esquire, moves the Court to direct the Prothonotary to amend the judgment in this matter, and in support thereof avers the following:

1. Plaintiff commenced this foreclosure action by filing a Complaint on September 24, 2008, a true and correct copy of which is attached hereto, made part hereof, and marked as Exhibit "A".
2. Judgment was entered on January 13, 2009 in the amount of \$89,190.75. A true and correct copy of the praecipe for judgment is attached hereto, made part hereof, and marked as Exhibit "B".

3. Pursuant to Pennsylvania Rule of Civil Procedure 1037(b)(1), a default judgment containing a dollar amount must be entered for the amount claimed in the complaint and any item which can be calculated from the complaint, i.e. bringing the interest current. However, new items cannot be added at the time of entry of the judgment.

4. The Property is listed for Sheriff's Sale on May 1, 2009.

5. Additional sums have been incurred or expended on Defendant's behalf since the Complaint was filed and Defendant has been given credit for any payments that have been made since the judgment. The amount of damages should now read as follows:

Principal Balance	\$80,809.88
Interest Through May 1, 2009	\$8,130.84
Per Diem \$21.86	
Late Charges	\$233.72
Legal fees	\$1,850.00
Cost of Suit and Title	\$1,020.00
Sheriff's Sale Costs	\$0.00
Property Inspections/ Property Preservation	\$127.50
Appraisal/Brokers Price Opinion	\$420.00
Mortgage Insurance Premium /	\$0.00
Private Mortgage Insurance	
Non Sufficient Funds Charge	\$0.00
Suspense/Misc. Credits	(\$0.00)
Escrow Deficit	\$1,076.66
TOTAL	\$93,668.60

6. The judgment formerly entered is insufficient to satisfy the amounts due on the Mortgage.

7. Under the terms of the Mortgage and Pennsylvania law, Plaintiff is entitled to inclusion of the figures set forth above in the amount of judgment against the Defendant.

8. Plaintiff's foreclosure judgment is in rem only and does not include personal liability, as addressed in Plaintiff's attached brief.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court amend the judgment as requested.

DATE: 3/8/09


By: 
Phelan Hallinan & Schmieg, LLP
Michele M. Bradford, Esquire
Attorney for Plaintiff

Exhibit “A”

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. 36657
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

187204

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE, FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED CERTIFICATES SERIES
2006-2
3476 STATEVIEW BLVD
FORT MILL, SC 29715

Plaintiff

v.
JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

Defendant

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

FILED
SEP 24 2008
William A. Shaw
Prothonotary/Clerk of Courts

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS
CIVIL DIVISION

TERM

NO. 08-1808-CD

CLEARFIELD COUNTY

We hereby certify the
within to be a true and
correct copy of the
original filed of record

ATTORNEY FILE COPY
PLEASE RETURN

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

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST ASSET-BACKED CERTIFICATES SERIES
2006-2
3476 STATEVIEW BLVD
FORT MILL, SC 29715

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

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

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

3. On 11/17/2005 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to CENTEX HOME EQUITY COMPANY, LLC which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200520299. By Assignment of Mortgage recorded 12/14/2007 the mortgage was assigned to PLAINTIFF which Assignment is recorded in Assignment of Mortgage Instrument No. 200720505. 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 06/01/2008 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	\$80,809.88
Interest	\$3,121.74
05/01/2008 through 09/19/2008	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$233.72
11/17/2005 to 09/19/2008	
Property Inspections	\$30.00
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$85,995.34
Escrow	
Credit	\$0.00
Deficit	\$826.43
Subtotal	<u>\$826.43</u>
TOTAL	\$86,821.77

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. The action does not come under Act 6 of 1974 because the original mortgage amount exceeds the dollar amount provided in the statute.
10. The mortgage premises are vacant and abandoned.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$86,821.77, together with interest from 09/19/2008 at the rate of \$22.14 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.

PHILAN HALLINAN & SCHMIEG, LLP

By: 

LAWRENCE T. PHILAN, ESQUIRE
FRANCIS S. HALLINAN, ESQUIRE
DANIEL G. SCHMIEG, ESQUIRE
MICHELE M. BRADFORD, ESQUIRE
JUDITH T. ROMANO, ESQUIRE
SHEETAL R. SHAH-JANI, ESQUIRE
JENNIFER 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 tract of land designated as Section 10, Lot 59, in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Clearfield County Recorder's Office.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declaration of Restrictions, Treasure Lake, Inc. recorded in Misc. Book Vol. 146, p. 476; all of said restrictions being covenants which run with the land.
3. All minerals and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Treasure Lake Property Owners Association, Inc.; which lien shall run with the land and be an encumbrance against it.

BEING the same premises conveyed by deed of Bessie L. Dubbs, widow, to Randy L. Anderson and Jeanne M. Anderson, husband and wife, dated December 31, 1997, and recorded in the Office of the Recorder of Deeds of Clearfield County in Volume 1899, page 358.


PARCEL NO: 1280-C02-010-00059-00-21
PROPERTY ADDRESS: 924 TREASURE LAKE

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
I.D. 86657

DATE: 9.19.08

Exhibit “B”

Phelan Hallinan & Schmieg, LLP
By: Daniel G. Schmieg, Esquire
Identification No. 62205
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
215-563-7000

COPY
ATTORNEY FILE COPY
PLEASE RETURN

Attorney for Plaintiff

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR SOUNDVIEW
HOME LOAN TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

: CLEARFIELD COUNTY
:
: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: No. 08-1808-CD
:

ATTORNEY FILE COPY
PLEASE RETURN

vs.

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

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

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against JEANNE M. ANDERSON,
Defendant(s) 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	\$86,821.77
Interest - 09/24/2008 to 01/08/2009	<u>\$2,368.98</u>
TOTAL	\$89,190.75

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

Daniel G. Schmieg
Daniel G. Schmieg, Esquire
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 1/13/09

PHS # 187204

PRO PRATHY

FILED

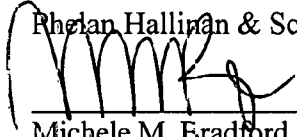
COPY
JAN 13 2009
William A. Shaw
Prothonotary/Clerk of Courts

VERIFICATION

Michele M. Bradford, Esquire, hereby states that she is the attorney for Plaintiff in this action, that she is authorized to make this verification, and that the statements made in the foregoing Motion to Reassess Damages are true and correct to the best of her knowledge, information and belief. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

DATE: 3/18/09

By:


Phelan Hallinan & Schmieg, LLP

Michele M. Bradford, Esquire
Attorney for Plaintiff

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire, Atty. I.D. No. 69849

1617 John F. Kennedy Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR SOUNDVIEW
HOME LOAN TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

Plaintiff

Court of Common Pleas

Civil Division

CLEARFIELD County

No. 08-1808-CD

v.

JEANNE M. ANDERSON

Defendant

CERTIFICATION OF SERVICE

I hereby certify that true and correct copies of Plaintiff's Motion to Reassess Damages, and Brief in Support thereof were sent to the following individuals on the date indicated below.

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

JEANNE M. ANDERSON
PROGRESSIVE BUSINESS
51 DELAWARE AVENUE
DUBOIS, PA 15801

JEANNE M. ANDERSON
378 Sher De Lin Road
Du Bois, PA 15801

DATE: 3/18/09

By:

Phelan Hallinan & Schmieg, LLP

Michele M. Bradford, Esquire
Attorney for Plaintiff

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

DEUTSCHE BANK NATIONAL TRUST	:	Court of Common Pleas
COMPANY, AS TRUSTEE, FOR SOUNDVIEW	:	
HOME LOAN TRUST ASSET-BACKED	:	Civil Division
CERTIFICATES SERIES 2006-2	:	
	:	CLEARFIELD County
Plaintiff	:	
	:	No. 08-1803-CD
v.	:	

JEANNE M. ANDERSON

Defendant

ORDER

AND NOW, this _____ day of _____, 2009 the Prothonotary is ORDERED to amend the in rem judgment and the Sheriff is ORDERED to amend the writ nunc pro tunc in this case as follows:

Principal Balance	\$80,809.88
Interest Through May 1, 2009	\$8,130.84
Per Diem \$21.86	
Late Charges	\$233.72
Legal fees	\$1,850.00
Cost of Suit and Title	\$1,020.00
Sheriff's Sale Costs	\$0.00
Property Inspections/ Property Preservation	\$127.50
Appraisal/Brokers Price Opinion	\$420.00
Mortgage Insurance Premium /	\$0.00
Private Mortgage Insurance	
Non Sufficient Funds Charge	\$0.00

(\$0.00)
\$1,076.66

\$93,668.60

Note: The above figure is not a payoff quote. Sheriff's commission is not included in the above figure.

J.

187204

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY
PENNSYLVANIA

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR SOUNDVIEW
HOME LOAN TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2
Plaintiff

v.

JEANNE M. ANDERSON

Defendant

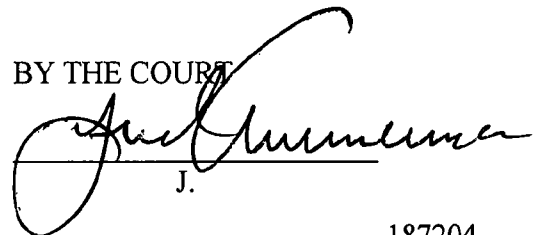
: Court of Common Pleas
:
: Civil Division
:
: CLEARFIELD County
:
: No. 08-1808-CD
:

RULE

AND NOW, this 20th day of March 2009, a Rule is entered upon the
Defendant to show cause why an Order should not be entered granting Plaintiff's Motion to
Reassess Damages.

Rule Returnable on the 16th day of April 2009, at 10:35 A.M. in the Clearfield
County Courthouse, Clearfield, Pennsylvania.
Hearing Room # 3.

BY THE COURT


J.

187204

FILED

011:30
MAR 20 2009

Atty Bradford

William A. Shaw
Prothonotary/Clerk of Courts

FILED

MAR 20 2009

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 3/22/09

☒ You are responsible for serving all appropriate parties.
____ The Prothonotary's office has provided service to the following parties:
____ Plaintiff(s) ____ Plaintiff(s) Attorney ____ Other
____ Defendant(s) ____ Defendant(s) Attorney
____ Special Instructions:

WILLIAM A. SHAW, PROTHONOTARY
AND CLERK OF COURTS

2009 MAR 17 10:32 AM

FILED *no cc*
m 110:3280
APR 01 2009
William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire, Atty. I.D. No. 69849

1617 John F. Kennedy Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR SOUNDVIEW
HOME LOAN TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

Plaintiff

: Court of Common Pleas

: Civil Division

: CLEARFIELD County

: No. 08-1808-CD

v.

JEANNE M. ANDERSON

Defendant

CERTIFICATION OF SERVICE

I hereby certify that a true and correct copy of the Court's March 20, 2009 Rule directing the Defendant to show cause as to why Plaintiff's Motion to Reassess Damages should not be granted was served upon the following individuals on the date indicated below.

JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

JEANNE M. ANDERSON
PROGRESSIVE BUSINESS
51 DELAWARE AVENUE
DUBOIS, PA 15801

JEANNE M. ANDERSON
378 Sher De Lin Road
Du Bois, PA 15801

DATE: 3/26/09

By:

Phelan Hallinan & Schmieg, LLP

Michele M. Bradford, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS : CLEARFIELD COUNTY
TRUSTEE, FOR SOUNDVIEW HOME LOAN TRUST : COURT OF COMMON PLEAS
ASSET-BACKED CERTIFICATES SERIES 2006-2 :
Plaintiff, : CIVIL DIVISION
v. :
JEANNE M. ANDERSON : NO. 08-1808-CD
Defendant(s) :

AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF CLEARFIELD) SS:

Plaintiff in the above action sets forth as of the date the Præcipe for the Writ of Execution was filed the following information concerning the real property located at: 924 TREASURE LAKE A/K/A 21 WAITING LANE DUBOIS, PA 15801-9023.

As required by Pa. R.C.P. 3129.2(e) Notice of Sale has been given to Lienholders in the manner required by Pa. R.C.F. 3129.2(c) on each of the persons or parties named, at that address set forth on the Affidavit No. 2 (previously filed) and/or Amended Affidavit No. 2 on the date indicated. A copy of the Certificate of Mailing (Form 3817) and/or Certified Mail Return Receipt stamped by the U.S. Postal Service is attached for each notice.

Daniel G. Schmieg
DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Date: March 31, 2009

IMPORTANT NOTICE: This property is sold at the direction of the plaintiff. It may not be sold in the absence of a representative of the plaintiff at the Sheriff's Sale. The sale must be postponed or stayed in the event that a representative of the plaintiff is not present at the sale.

187204

FILED
m 11:26 AM
APR 06 2009
William A. Shaw
Prothonotary/Clerk of Courts

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

NAME

LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)

TENANT/OCCUPANT

924 TREASURE LAKE
A/K/A 21 WAITING LANE
DUBOIS, PA 15801-9023

DOMESTIC RELATIONS
CLEARFIELD COUNTY

CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET STREET
CLEARFIELD, PA 16830

COMMONWEALTH OF
PENNSYLVANIA

DEPARTMENT OF WELFARE
PO BOX 2675
HARRISBURG, PA 17105

Commonwealth of Pennsylvania
Bureau of Individual Tax
Inheritance Tax Division

6th Floor, Strawberry Sq., Dept 28061
Harrisburg, PA 17128

Internal Revenue Service
Federated Investors Tower

13TH Floor, Suite 1300
1001 Liberty Avenue
Pittsburgh, PA 15222

Department of Public Welfare
TPL Casualty Unit
Estate Recovery Program

P.O. Box 8486
Willow Oak Building
Harrisburg, PA 17105

TREASURE LAKE PROERTY
OWNERS ASSOCIATION

13 TREASURE LAKE
DUBOIS, PA 15801

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

MARCH 31, 2009

Date


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Name and
Address
of Sender



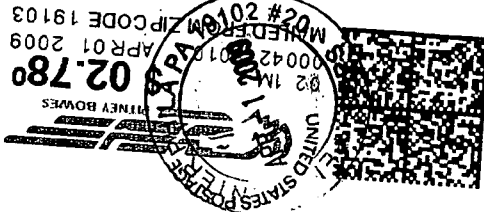
PHELAN HALLINAN & SCHMIEG
One Penn Center at Suburban Station, Suite 1400
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814

SENT 3/31/09

TEAM 5 JED

SALE DATE 5/1/09

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee
1		TENANT/OCCUPANT 924 TREASURE LAKE A/K/A 21 WAITING LANE DUBOIS, PA 15801-9023		
2		DOMESTIC RELATIONS CLEARFIELD COUNTY CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830		
3		COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF WELFARE PO BOX 2675 HARRISBURG, PA 17105		
4		Commonwealth of Pennsylvania, Bureau of Individual Tax Inheritance Tax Division, 6 th Floor Strawberry Sq., Dept 28061 Harrisburg, PA 17128		
5		Internal Revenue Service, Federated Investors Tower 13 TH Floor, Suite 1300 1001 Liberty Avenue Pittsburgh, PA 15222		
6		Department of Public Welfare, TPL Casualty Unit Estate Recovery Program, P.O. Box 8486 Willow Oak Building Harrisburg, PA 17105		
7		TREASURE LAKE PROERTY OWNERS 13 TREASURE LAKE DUBOIS, PA 15801		
8				
9				
10				
11				
12				
Total Number of Pieces Listed by Sender		Re: JEANNE M. ANDERSON	187204	
Total Number of Pieces Received at Post Office		Postmaster, Per (Name of Receiving Employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional insurance. See Domestic Mail Manual R900.S913 and S921 for limitations of coverage.	



PHELAN HALLINAN & SCHMIEG
BY: DANIEL G. SCHMIEG, ESQUIRE
I.D. NO. 62205
ONE PENN CENTER AT SUBURBAN
STATION, SUITE 1400
1617 JOHN F. KENNEDY BOULEVARD
PHILADELPHIA, PA 19103-1814

ATTORNEY FOR PLAINTIFF

187204

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST ASSET-
BACKED CERTIFICATES SERIES 2006-2

: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: NO. 08-1808-CD

v.

JEANNE M. ANDERSON

SUGGESTION OF RECORD CHANGE
RE: ADDRESS CHANGE

TO THE PROTHONOTARY:

DANIEL G. SCHMIEG, ESQUIRE, attorney for the plaintiff, hereby certifies that to the best of
his knowledge, information and belief, the defendant(s)' property address was erroneously listed as:

924 TREASURE LAKE, DUBOIS, PA 15801-9023,

The correct address for the defendant(s) is:

924 TREASURE LAKE A/K/A 21 WAITING LANE, DUBOIS, PA 15801-9023

Kindly change the information on the docket to reflect this change.


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

FILED *ICC Sheriff*
m 11:17 AM
APR 06 2009 *(610)*
William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP
By: Daniel G. Schmieg, Esquire, ID No. 62205
One Penn Center at Suburban Station
Suite 1400
Philadelphia, PA 1903-1814
215-563-7000

Attorney for Plaintiff

187204

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST
ASSET-BACKED CERTIFICATES SERIES
2006-2

COURT OF COMMON PLEAS

CIVIL DIVISION

CLEARFIELD COUNTY

vs.

No.: 08-1808-CD

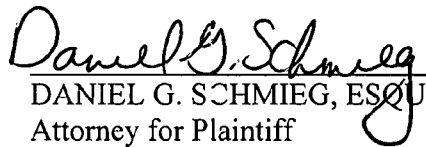
JEANNE M. ANDERSON

PRAECIPE TO SUBSTITUTE LEGAL DESCRIPTION

TO THE PROTHONOTARY:

Kindly substitute the attached legal description for the legal description originally filed
with the Writ in the instant matter.

April 3, 2009
Date


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

FILED ICC
mjl:lab
APR 06 2009 Sheriff
(GR)
William A. Shaw
Prothonotary/Clerk of Courts



LEGAL DESCRIPTION

ALL that certain tract of land designated as Section 10, Lot 59, in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania, recorded in the Clearfield County Recorder's Office.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declaration of Restrictions, Treasure Lake, Inc. recorded in Misc. Book Vol. 146, p. 476; all of said restrictions being covenants which run with the land.
3. All minerals and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Treasure Lake Property Owners Association, Inc.; which lien shall run with the land and be an encumbrance against it.

BEING the same premises conveyed by deed of Bessie L. Dubbs, widow, to Randy L. Anderson and Jeanne M. Anderson, husband and wife, dated December 31, 1997, and recorded in the Office of the Recorder of Deeds of Clearfield County in Volume 1899, page 358.

TITLE TO SAID PREMISES IS VESTED IN Jeanne M. Anderson, a widow, by Deed from Jeanne M. Anderson, a widow, dated 07/12/2004, recorded 07/16/2004 in Instrument Number 200411524.

Premises being: 924 TREASURE LAKE A/K/A 21 WAITING LANE
DUBOIS, PA 15801-9023

Tax Parcel No. 1280-C02-010-00059-00-21

FILED

0 10:45 a.m. 6K
APR 16 2009

(610)
1 CC AHG
#40-CC

William A. Shaw
Prothonotary/Clerk of Courts

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

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE, FOR SOUNDVIEW
HOME LOAN TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

Plaintiff

v.

JEANNE M. ANDERSON

Defendant

Court of Common Pleas

Civil Division

CLEARFIELD County

No. 08-1808-CD

ORDER

AND NOW, this 16 day of April, 2009 the Prothonotary is ORDERED to
amend the in rem judgment and the Sheriff is ORDERED to amend the writ nunc pro tunc in this
case as follows:

Principal Balance	\$80,809.88
Interest Through May 1, 2009	\$8,130.84
Per Diem \$21.86	
Late Charges	\$233.72
Legal fees	\$1,850.00
Cost of Suit and Title	\$1,020.00
Sheriff's Sale Costs	\$0.00
Property Inspections/ Property Preservation	\$127.50
Appraisal/Brokers Price Opinion	\$420.00
Mortgage Insurance Premium /	\$0.00
Private Mortgage Insurance	
Non Sufficient Funds Charge	\$0.00

Suspense/Misc. Credits
Escrow Deficit

(\$0.00)
\$1,076.66

TOTAL

\$93,668.60

Plus interest from May 1, 2009 through the date of sale at six percent per annum.

Note: The above figure is not a payoff quote. Sheriff's commission is not included in the above figure.

BY THE COURT

A handwritten signature in black ink, appearing to read "Fred Green", is written over a horizontal line.

187204

FILED

APR 16 2009

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 4-17-09

☒ You are responsible for serving all appropriate parties.

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

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

____ Defendant(s) ____ Defendant(s) Attorney

____ Special Instructions:

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20929
NO: 08-1808-CD

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED CERTIFICATES SERIES 2006-2

vs.

DEFENDANT: JEANNE M. ANDERSON

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 2/11/2009

LEVY TAKEN 3/2/2009 @ 2:39 PM

POSTED 3/2/2009 @ 2:39 PM

SALE HELD 6/5/2009

SOLD TO DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR SOUNDVIEW HOME
LOAN TRUST ASSET-BACKED CERTIFICATES SERIES 2006-2

SOLD FOR AMOUNT \$45,000.00 PLUS COSTS

WRIT RETURNED 8/27/2009

DATE DEED FILED 8/27/2009

PROPERTY ADDRESS 924 TREASURE LAKE A/K/A 21 WATING LANE A/K/A SECT 10, LOT 59 DUBOIS , PA 15801

SERVICES

4/6/2009 @ 10:05 AM SERVED JEANNE M. ANDERSON

SERVED JEANNE M. ANDERSON, DEFENDANT, AT HER PLACE OF EMPLOYMENT 15 DELAWARE STREET, STONEY SIDE VILLAGE,
DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JEANNE ANDERSON

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.

4/9/2009 @ 12:45 PM SERVED JEANNE M. ANDERSON

SERVED JEANNE M. ANDERSON, DEFENDANT, AT THE DUBOIS MALL PARKING LOT, DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY
HANDING TO JEANNE M. ANDERSON

A NEW NOTICE OF SALE WITH NEW PROPERTY DESCRIPTION.

@ SERVED

NOW, APRIL 27, 2009 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED FOR
MAY 1, 2009 TO JUNE 5, 2009.

FILED
012:19:04
AUG 27 2009
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20929
NO: 08-1808-CD

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED CERTIFICATES SERIES 2006-2

vs.

DEFENDANT: JEANNE M. ANDERSON

Execution REAL ESTATE

SHERIFF RETURN

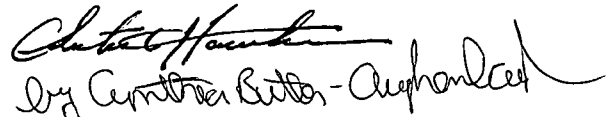
SHERIFF HAWKINS \$1,317.24

SURCHARGE \$20.00 PAID BY ATTORNEY

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

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

DEUTSCHE BANK NATIONAL
TRUST COMPANY, AS TRUSTEE,
FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED
CERTIFICATES SERIES 2006-2

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No.

No. 08-1808-CD

No.

WRIT OF EXECUTION
(Mortgage Foreclosure)

vs.

JEANNE M. ANDERSON

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

PREMISES: 924 TREASURE LAKE, DUBOIS, PA 15801-9023
(See Legal Description attached)

Amount Due

Interest from 1/9/09 to Sale

Per diem \$14.66

Add'l Costs

Writ Total

Prothonotary costs \$89,190.75
135.00

\$ _____

\$2,880.00

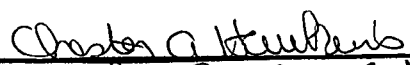
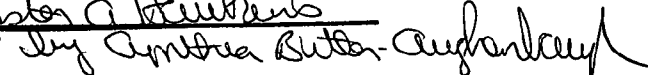
\$


OFFICE OF THE PROTHONOTARY OF CLEARFIELD
COUNTY, PENNSYLVANIA

Dated 2/11/09
(SEAL)

187204

Received this writ this 11th day
of February A.D. 2009
At 3:00 A.M. (P.M.)


Sheriff 

No. 08-1808:CD.....

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

DEUTSCHE BANK NATIONAL TRUST COMPANY,
AS TRUSTEE, FOR SOUNDVIEW HOME LOAN
TRUST ASSET-BACKED CERTIFICATES SERIES
2006-2

vs.

JEANNE M. ANDERSON

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Real Debt \$89,190.75

Int. from 1/9/09

To Date of Sale (\$14.66 per diem)

Costs

Prothy Pd. 135.00

Sheriff

Daniel H. Schmieg

DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Address: JEANNE M. ANDERSON
924 TREASURE LAKE
DUBOIS, PA 15801-9023

FILED
JAN 11 2009
CLEARFIELD COUNTY, PA
CLERK OF COURT
JAN 11 2009

LEGAL DESCRIPTION

Sandy Township, Clearfield County, Pennsylvania, recorded in the Clearfield County Recorder's Office.

EXCEPTING AND RESERVING therefrom and subject to:

1. All easements, rights of way, reservations, restrictions and limitations shown or contained in prior instruments of record and in the aforesaid recorded plan.
2. The Declaration of Restrictions, Treasure Lake, Inc. recorded in Misc. Book Vol. 146, p. 476; all of said restrictions being covenants, which run with the land.
3. All minerals and mining rights of every kind and nature.
4. A lien for all unpaid charges or assessments as may be made by Treasure Lake Property Owners Association, Inc.; which lien shall run with the land and be an encumbrance against it.

BEING the same premises conveyed by deed of Bessie L. Dubbs, widow, to Randy L. Anderson and Jeanne M. Anderson, husband and wife, dated December 31, 1997, and recorded in the Office of the Recorder of Deeds of Clearfield County in Volume 1899, page 358.

TITLE TO SAID PREMISES IS VESTED IN Jeanne M. Anderson, a widow, by Deed from Jeanne M. Anderson, a widow, dated 07/12/2004, recorded 07/16/2004 in Instrument Number 200411524.

Premises being: 924 TREASURE LAKE
DUBOIS, PA 15801-9023

Tax Parcel No. 1280-C02-010-00059-00-21

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME JEANNE M. ANDERSON

NO. 08-1808-CD

NOW, August 27, 2009, 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 June 05, 2009, I exposed the within described real estate of Jeanne M. Anderson to public venue or outcry at which time and place I sold the same to DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR SOUNDVIEW HOME LOAN TRUST ASSET-BACKED CERTIFICATES SERIES 2006-2 he/she being the highest bidder, for the sum of \$45,000.00 plus costs and made the following appropriations, viz:

SHERIFF COSTS:

RDR	15.00
SERVICE	15.00
MILEAGE	20.90
LEVY	15.00
MILEAGE	20.90
POSTING	15.00
CSDS	10.00
COMMISSION	900.00
POSTAGE	5.04
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	125.40
ADD'L LEVY	
BID AMOUNT	45,000.00
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	10.00
CONTINUED SALES	20.00
MISCELLANEOUS	25.00
TOTAL SHERIFF COSTS	\$1,317.24

DEED COSTS:

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	28.50
TRANSFER TAX 2%	0.00
TOTAL DEED COSTS	\$28.50

PLAINTIFF COSTS, DEBT AND INTEREST:

DEBT-AMOUNT DUE	89,190.75
INTEREST @ 14.6600 %	2,155.02
FROM 01/09/2009 TO 06/05/2009	
PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	20.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	
TOTAL DEBT AND INTEREST	\$91,365.77

COSTS:

ADVERTISING	1,557.30
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	28.50
SHERIFF COSTS	1,317.24
LEGAL JOURNAL COSTS	297.00
PROTHONOTARY	135.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
TOTAL COSTS	\$3,480.04

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

Phelan Hallinan & Schmieg, L.L.P.
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Fax: (215) 563-7009

Foreclosure Manager

Representing Lenders in
Pennsylvania and New Jersey

April 27, 2009

Office of the Sheriff
Clearfield County Courthouse
1 North Second Street
Clearfield, PA 16830

Attn: Real Estate Department

Fax Number: 814-765-5915

Re: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, FOR
SOUNDVIEW HOME LOAN TRUST ASSET-BACKED CERTIFICATES
SERIES 2006-2 v.
JEANNE M. ANDERSON
924 TREASURE LAKE A/K/A 21 WAITING LANE DUBOIS, PA 15801-9023
Court No. 08-1808-CD

Dear Sir/Madam:

Please Postpone the Sheriff Sale of the above referenced property, which is
scheduled for May 1, 2009 due to the following: Service of NOS.

The Property is to be relisted for the June 5, 2009 Sheriff Sale.

Thank you for your correspondence in this matter.

Very Truly Yours,
TOBY BJORKMAN for
Phelan Hallinan & Schmieg, LLP