

08-1939-CD

Citimortgage Inc vs Stephanie Johnson al

5  
**FILED**

OCT 10 2008

W/12:20/12  
William A. Shaw  
Prothonotary/Clerk of Courts

2 cent to Shen

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 138640

ATTORNEY FOR PLAINTIFF

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.  
1000 TECHNOLOGY DRIVE  
MAIL STATION  
O'FALLON, MO 63368-2240

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

Plaintiff

NO. 2008-1939-CO

v.

CLEARFIELD COUNTY

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

Defendants

March 3, 2009 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service

Deputy Prothonotary

May 21, 2009 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

Deputy Prothonotary

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

## NOTICE

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

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

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

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

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

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

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

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

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

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

1. Plaintiff is

CITIMORTGAGE, INC. S/B/M TO  
ABN AMRO MORTGAGE GROUP, INC.  
1000 TECHNOLOGY DRIVE  
MAIL STATION  
O'FALLON, MO 63368-2240

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

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

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

3. On 11/30/2006 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No. 200620274. 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:

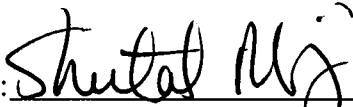
Principal Balance	\$53,547.00
Interest	\$1,574.64
05/01/2008 through 10/09/2008 (Per Diem \$9.72)	
Attorney's Fees	\$1,325.00
Cumulative Late Charges	\$69.64
11/30/2006 to 10/09/2008	
Mortgage Insurance Premium /	\$6.62
Private Mortgage Insurance	
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$57,072.90
Escrow	
Credit	\$0.00
Deficit	\$1,666.00
Subtotal	<u>\$1,666.00</u>
<b>TOTAL</b>	<b>\$58,738.90</b>

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

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$58,738.90, together with interest from 10/09/2008 at the rate of \$9.72 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:  ED NO. 81760  
LAWRENCE T. PHELAN, ESQUIRE  
FRANCIS S. HALLINAN, ESQUIRE  
DANIEL G. SCHMIEG, ESQUIRE  
MICHELE M. BRADFORD, ESQUIRE  
JUDITH T. ROMANO, ESQUIRE  
SHEETAL R. SHAH-JANI, ESQUIRE  
JENINE R. DAVEY, ESQUIRE  
LAUREN R. TABAS, ESQUIRE  
VIVEK SRIVASTAVA, ESQUIRE  
JAY B. JONES, ESQUIRE  
PETER MULCAHY, ESQUIRE  
ANDREW SPIVACK, ESQUIRE  
JAIME MCGUINNESS, ESQUIRE  
Attorneys for Plaintiff



## **LEGAL DESCRIPTION**

ALL that certain lot or piece of ground situate in the Township of Penn, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post on line of public road, thence South seventy and one half (70 1/2) degrees West three hundred forty-four (344) feet to post on line of same public road; thence North five and one half (5 1/2) degrees East two hundred seventy-nine (279) feet to post on line now or formerly of G. L. Wood; thence South sixty-two and one fourth (62) degrees East three hundred forty-four (344) feet to place of beginning. Containing one (1) acre, more or less.

Being the same premises granted and conveyed unto Matthew E. Johnson and Stephanie M. Johnson, husband and wife, by deed of Leo P. Krise, Sr. and Florence L. Krise, husband and wife, and Christine A. Spencer and Raymond L. Spencer, wife and husband, dated October 29, 1998 and recorded October 30, 1998 in Clearfield County Deed Book 1981, Page 171.

PARCEL NO. F10-000-00101

**PROPERTY BEING: 999 FRIENDLY ACRES ROAD**

**VERIFICATION**

I hereby state that I am the attorney for the 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.

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.

DATE: 10/9/08

Shital W. Singh DO NO-81760  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1939-CD

CITIMORTGAGE, INC. s/b/m

VS

SERVICE # 2 OF 2

STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 11/09/2008

HEARING: 10/10/2008

PAGE: 104771

DEFENDANT:

MATTHEW E. JOHNSON

ADDRESS:

999 FRIENDLY ACRES ROAD

CURWENSVILLE, PA 16833

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

FILED  
NOV 10 2008  
0/10:00  
William A. Shaw  
Prothonotary/Clerk of Courts

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

10-21-08-9:22<sup>AM</sup> - N/H - Left Note

11-6-08-10:48<sup>AM</sup> - N/H - Left Note

11-4-08-9:12<sup>AM</sup> - N/H 11-5-08-9:42<sup>AM</sup> - N/H

**SHERIFF'S RETURN**

NOW, 11-10-2008 AT 10:05 <sup>AM</sup> PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON MATTHEW E. JOHNSON, DEFENDANT

BY HANDING TO MATTHEW E. JOHNSON 1 DEFENDANT

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

ADDRESS SERVED CLEARFIELD COUNTY SHERIFF

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

COMPLAINT IN MORTGAGE FORECLOSURE FOR MATTHEW E. JOHNSON

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

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

I MAKE RETURN OF NOT FOUND AS TO MATTHEW E. JOHNSON

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

SWORN TO BEFORE ME THIS

10<sup>th</sup> DAY OF Nov. 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: [Signature] Deputy Signature

Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1939-CD

CITIMORTGAGE, INC. s/b/m

VS

SERVICE # 1 OF 2

STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 11/09/2008

HEARING: 10/10/2008

PAGE: 104771

DEFENDANT:

STEPHANIE M. JOHNSON

ADDRESS:

999 FRIENDLY ACRES ROAD

CURWENSVILLE, PA 16833

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

FILED

013:268V  
NOV 25 2008

William A. Shaw  
Prothonotary/Clerk of Courts

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

10-21-08-9:22<sup>AM</sup> N/H - Left Note 11-6-08-10:48<sup>AM</sup> N/H - Left Note

11-4-08-9:12<sup>AM</sup> N/H 11-5-08-9:42<sup>AM</sup> N/H

SHERIFF'S RETURN

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON STEPHANIE M. JOHNSON, DEFENDANT

BY HANDING TO \_\_\_\_\_ / \_\_\_\_\_

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

ADDRESS SERVED \_\_\_\_\_

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

COMPLAINT IN MORTGAGE FORECLOSURE FOR STEPHANIE M. JOHNSON

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

NOW 11-25-08 AT 3:23 AM / PM **POSTED** AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO STEPHANIE M. JOHNSON

REASON UNABLE TO LOCATE LEFT NOTES, NO Response

SWORN TO BEFORE ME THIS

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

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy Signature

JAMES E. DAVIS

Print Deputy Name

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

OCT 10 2008

PHELAN HALLINAN & SCHMIEG, LLP  
LAWRENCE T. PHELAN, ESQ., Id. No. 32227  
FRANCIS S. HALLINAN, ESQ., Id. No. 62695  
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JAIME MCGUINNESS, ESQ., Id. No. 90134  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000

188640

Attest.

*William A. ...*  
Prothonotary/  
Clerk of Courts

ATTORNEY FOR PLAINTIFF

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.  
1000 TECHNOLOGY DRIVE  
MAIL STATION  
O'FALLON, MO 63368-2240

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

Plaintiff

NO. 2008-1939-CV

v.

CLEARFIELD COUNTY

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

Defendants

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

**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.

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DEBT OR ANY PORTION THEREOF. IF DEFENDANT(S)  
DO SO IN WRITING WITHIN THIRTY (30) DAYS OF  
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PLAINTIFF WILL OBTAIN AND PROVIDE  
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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**

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**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

CITIMORTGAGE, INC. S/B/M TO  
ABN AMRO MORTGAGE GROUP, INC.  
1000 TECHNOLOGY DRIVE  
MAIL STATION  
O'FALLON, MO 63368-2240

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

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

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

3. On 11/30/2006 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No. 200620274. 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	\$53,547.00
Interest	\$1,574.64
05/01/2008 through 10/09/2008 (Per Diem \$9.72)	
Attorney's Fees	\$1,325.00
Cumulative Late Charges	\$69.64
11/30/2006 to 10/09/2008	
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Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$57,072.90
Escrow	
Credit	\$0.00
Deficit	\$1,666.00
Subtotal	<u>\$1,666.00</u>
<b>TOTAL</b>	<b>\$58,738.90</b>

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

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$58,738.90, together with interest from 10/09/2008 at the rate of \$9.72 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: Sheetal Mij ID NO. 81760

LAWRENCE T. PHELAN, ESQUIRE  
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PETER MULCAHY, ESQUIRE  
ANDREW SPIVACK, ESQUIRE  
JAIME MCGUINNESS, ESQUIRE

Attorneys for Plaintiff

## **LEGAL DESCRIPTION**

ALL that certain lot or piece of ground situate in the Township of Penn, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post on line of public road, thence South seventy and one half (70 1/2) degrees West three hundred forty-four (344) feet to post on line of same public road; thence North five and one half (5 1/2) degrees East two hundred seventy-nine (279) feet to post on line now or formerly of G. L. Wood; thence South sixty-two and one fourth (62) degrees East three hundred forty-four (344) feet to place of beginning. Containing one (1) acre, more or less.

Being the same premises granted and conveyed unto Matthew E. Johnson and Stephanie M. Johnson, husband and wife, by deed of Leo P. Krise, Sr. and Florence L. Krise, husband and wife, and Christine A. Spencer and Raymond L. Spencer, wife and husband, dated October 29, 1998 and recorded October 30, 1998 in Clearfield County Deed Book 1981, Page 171.

PARCEL NC. F10-000-00101

**PROPERTY BEING: 999 FRIENDLY ACRES ROAD**

**VERIFICATION**

I hereby state that I am the attorney for the 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.

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.

DATE: 10/9/08

Shital K. J. ID NO-81760  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104771  
NO: 08-1939-CD  
SERVICES 2  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: CITIMORTGAGE, INC. s/b/m  
vs.  
DEFENDANT: STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	738765	20.00
SHERIFF HAWKINS	PHELAN	738765	53.08

*S*  
**FILED**  
*01/31/30 LM*  
**FEB 04 2009**  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

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

So Answers,

*Chester A. Hawkins*

Chester A. Hawkins  
Sheriff

Phelan Hallinan & Schmieg, L.L.P.  
By: Daniel G. Schmieg, Esquire No. 62205  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Attorney for Plaintiff

Citimortgage, Inc. S/B/M To ABN AMRO  
Mortgage Group, Inc.

: COURT OF COMMON PLEAS

:  
: CIVIL DIVISION

vs.

Stephanie M. Johnson  
Matthew E. Johnson

: CLEARFIELD COUNTY

: NO. 2008-1939-CD

**MOTION FOR SERVICE PURSUANT TO**  
**SPECIAL ORDER OF COURT**

Plaintiff, by its counsel, Phelan Hallinan & Schmieg, L.L.P., moves this Honorable Court for an Order directing service of the Complaint upon the above-captioned Defendant, Stephanie M. Johnson by posting a copy of the complaint to the mortgaged premises, as well as sending first class mail and certified mail to the mortgaged premises, 999 Friendly Acres Road, Curwensville, PA 16833, and in support thereof avers the following:

1. Plaintiff, by and through its counsel, initiated the above referenced Complaint in Mortgage Foreclosure Action on October 10, 2008. As indicated by the copy of said complaint attached hereto as Exhibit "A".

FILED No CC  
MAR 02 2009 (60)

5  
William A. Shaw  
Prothonotary/Clerk of Courts

2. Attempts to serve Defendant, Stephanie M. Johnson, personally with the Complaint have been unsuccessful. The Sheriff of Clearfield County attempted to serve the Defendant at the mortgaged premises, 999 Friendly Acres Road, Curwensville, PA 16833. As indicated by the Sheriff's Return of Service attached hereto as Exhibit "B", the attempts made were unsuccessful with no answer.

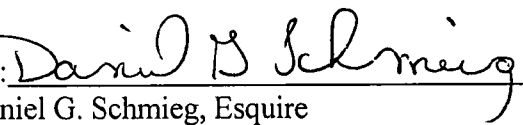
3. Pursuant to Pa.R.C.P. 430, Plaintiff has made a good faith effort to locate the Defendant. An Affidavit of Reasonable Investigation setting forth the specific inquiries made and the results is attached hereto as Exhibit "C".

4. Plaintiff has reviewed its internal records and has not been contacted by the Defendant as of February 27, 2009 to bring loan current.

5. Plaintiff submits that it has made a good faith effort to locate the Defendant but has been unable to do so.

**WHEREFORE**, Plaintiff respectfully requests this Honorable Court enter an Order pursuant to Pa.R.C.P. 430 directing service of the Complaint by posting, first class mail and certified mail.

Respectfully submitted,  
Phelan Hallinan & Schmieg, L.L.P.

By:   
Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Date: February 27, 2009





OCT 10 2008

William A. Shaw  
Prothonotary/Clerk of Courts

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 188640

ATTORNEY FOR PLAINTIFF

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.  
1000 TECHNOLOGY DRIVE  
MAIL STATION  
O'FALLON, MO 63368-2240

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

Plaintiff

NO. 2008-1939-CD

v.

CLEARFIELD COUNTY

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

Defendants

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

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

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  
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JAIME MCGUINNESS, ESQ., Id. No. 90134  
ONE PENN CENTER PLAZA, SUITE 1400  
PHILADELPHIA, PA 19103  
(215) 563-7000 188640

ATTORNEY FOR PLAINTIFF

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.  
1000 TECHNOLOGY DRIVE  
MAIL STATION  
O'FALLON, MO 63368-2240

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

Plaintiff

NO. 2008-1939-CD

v.

CLEARFIELD COUNTY

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

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

Defendants

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

## NOTICE

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

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

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

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

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

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

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

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

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

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

1. Plaintiff is

CITIMORTGAGE, INC. S/B/M TO  
ABN AMRO MORTGAGE GROUP, INC.  
1000 TECHNOLOGY DRIVE  
MAIL STATION  
O'FALLON, MO 63368-2240

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

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

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

3. On 11/30/2006 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to PLAINTIFF which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Instrument No. 200620274. 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	\$53,547.00
Interest	\$1,574.64
05/01/2008 through 10/09/2008 (Per Diem \$9.72)	
Attorney's Fees	\$1,325.00
Cumulative Late Charges	\$69.64
11/30/2006 to 10/09/2008	
Mortgage Insurance Premium / Private Mortgage Insurance	\$6.62
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$57,072.90
Escrow	
Credit	\$0.00
Deficit	\$1,666.00
Subtotal	<u>\$1,666.00</u>
<b>TOTAL</b>	<b>\$58,738.90</b>

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

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$58,738.90, together with interest from 10/09/2008 at the rate of \$9.72 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:  ID NO. 81760

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

Attorneys for Plaintiff

## **LEGAL DESCRIPTION**

ALL that certain lot or piece of ground situate in the Township of Penn, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post on line of public road, thence South seventy and one half (70 1/2) degrees West three hundred forty-four (344) feet to post on line of same public road; thence North five and one half (5 1/2) degrees East two hundred seventy-nine (279) feet to post on line now or formerly of G. L. Wood; thence South sixty-two and one fourth (62) degrees East three hundred forty-four (344) feet to place of beginning. Containing one (1) acre, more or less.

Being the same premises granted and conveyed unto Matthew E. Johnson and Stephanie M. Johnson, husband and wife, by deed of Leo P. Krise, Sr. and Florence L. Krise, husband and wife, and Christine A. Spencer and Raymond L. Spencer, wife and husband, dated October 29, 1998 and recorded October 30, 1998 in Clearfield County Deed Book 1981, Page 171.

PARCEL NO. F10-000-C0101

**PROPERTY BEING: 999 FRIENDLY ACRES ROAD**

**VERIFICATION**

I hereby state that I am the attorney for the 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.

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.

DATE:

10/9/08

Shital M. J. DO NO-81760  
Attorney for Plaintiff



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO: 08-1939-CD

CITIMORTGAGE, INC. s/b/m

vs

SERVICE # 1 OF 2

STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON  
COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 11/09/2008 HEARING: 10/10/2008 PAGE: 104771

DEFENDANT: STEPHANIE M. JOHNSON  
ADDRESS: 999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

OCCUPIED

ATTEMPTS

10-21-08-9:22<sup>AM</sup> N/H - LEFT NOTE 11-6-08-10:48<sup>PM</sup> N/H - LEFT NOTE  
11-4-08-9:12<sup>AM</sup> N/H 11-5-08-9:42<sup>AM</sup> N/H

## SHERIFF'S RETURN

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON STEPHANIE M. JOHNSON, DEFENDANT

BY HANDING TO \_\_\_\_\_

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

ADDRESS SERVED \_\_\_\_\_

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

COMPLAINT IN MORTGAGE FORECLOSURE FOR STEPHANIE M. JOHNSON

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

NOW 11-25-08 AT 2:23 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF NOT FOUND AS TO STEPHANIE M. JOHNSON

REASON UNABLE TO LOCATE LEFT NOTES, NO Response

SWORN TO BEFORE ME THIS

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

So Answers: CHESTER A. HAWKINS SHERIFF

BY: \_\_\_\_\_

Deputy Signature

JAMES E. DAVIS  
Print Deputy Name



**FULL SPECTRUM SERVICES, INC.  
AFFIDAVIT OF GOOD FAITH INVESTIGATION**

File Number     188640  
Attorney Firm:   **Phelan, Hallinan & Schmieg, LLP**  
Subject:         Stephanie M. Johnson & Matthew E. Johnson

Property Address:   999 Friendly Acres Road, Curwensville, PA 16833  
Possible Mailing Address:     (Matthew E. Johnson) Penn Area, Penn, PA 15675

**I, Brendan Booth, being duly sworn according to law, do hereby depose and state as follows, I have conducted an investigation into the whereabouts of the above-noted individual(s) and have discovered the following:**

**I. CREDIT INFORMATION**

**A. SOCIAL SECURITY NUMBER**

Our search verified the following information to be true and correct

Stephanie M. Johnson - xxx-xx-6985

Matthew E. Johnson - xxx-xx-6080

**B. EMPLOYMENT SEARCH**

Stephanie M. Johnson & Matthew E. Johnson - A review of the credit reporting agencies provided no employment information.

**C. INQUIRY OF CREDITORS**

Our inquiry of creditors indicated that Stephanie M. Johnson & Matthew E. Johnson reside(s) at: 999 Friendly Acres Road, Curwensville, PA 16833.

**II. INQUIRY OF TELEPHONE COMPANY**

**A. DIRECTORY ASSISTANCE SEARCH**

Our office contacted directory assistance, which indicated that Stephanie M. Johnson & Matthew E. Johnson reside(s) at: 999 Friendly Acres Road, Curwensville, PA 16833. On 10-06-08 our office made several telephone calls to the subjects' phone number (814) 236-2876 and received the following information: answering machine.

**III. INQUIRY OF NEIGHBORS**

On 10-05-08 our office made several phone calls in an attempt to contact Joseph E. Tubbs (814) 236-1199, 1010 Friendly Acres Road, Curwensville, PA 16833: no answer.

On 10-06-08 our office made a phone call in an attempt to contact Kenneth B. Prisk Jr. (814) 236-3036, 990 Friendly Acres Road, Curwensville, PA 16833: fax tone.

On 10-06-08 our office made several phone calls in an attempt to contact Cory L. Tubbs (814) 236-4652, 996 Friendly Acres Road, Curwensville, PA 16833: no answer.

Using our white pages database our office was unable to locate any neighbors for Penn Area, Penn, PA 15675.

#### IV. ADDRESS INQUIRY

##### A. NATIONAL ADDRESS UPDATE

On 10-06-08 we reviewed the National Address database and found the following information: Stephanie M. Johnson - 999 Friendly Acres Road, Curwensville, PA 16833 & Matthew E. Johnson - Penn Area, Penn, PA 15675.

##### B. ADDITIONAL ACTIVE MAILING ADDRESSES

Per our inquiry of creditors, the following is a possible mailing address: (Matthew E. Johnson) Penn Area, Penn, PA 15675.

#### V. DRIVERS LICENSE INFORMATION

##### A. MOTOR VEHICLE & DMV OFFICE

Per the PA Department of Motor Vehicles, we were unable to obtain address information on Stephanie M. Johnson & Matthew E. Johnson.

#### VI. OTHER INQUIRIES

##### A. DEATH RECORDS

As of 10-06-08 Vital Records and all public databases have no death record on file for Stephanie M. Johnson & Matthew E. Johnson.

##### B. COUNTY VOTER REGISTRATION

The county voter registration was unable to confirm a registration for Stephanie M. Johnson & Matthew E. Johnson residing at: last registered address.

#### VII. ADDITIONAL INFORMATION OF SUBJECT

##### A. DATE OF BIRTH

Stephanie M. Johnson - 07-27-1973

Matthew E. Johnson - 09-1973

##### B. A.K.A.

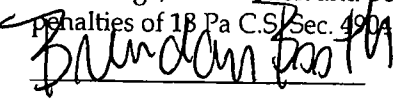
Stephanie M. Bennett

\* Our accessible databases have been checked and cross-referenced for the above named individual(s).

\* Please be advised our database information indicates the subject resides at the current address.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing states made by me are willfully false, I am subject to punishment.

I hereby verify that the statements made herein are true and correct to the best of my knowledge, information and belief and that this affidavit of investigation is made subject to the penalties of 18 Pa C.S. Sec. 4904 relating to unsworn falsification to authorities.

  
AFFIANT - Brendan Booth  
Full Spectrum Services, Inc.

Sworn to and subscribed before me this 6<sup>th</sup> day of October, 2008.

  
COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL  
THOMAS P. STRAIN, Notary Public  
City of Philadelphia, Phila. County  
My Commission Expires February 4, 2010

The above information is obtained from available public records  
and we are only liable for the cost of the affidavit.

IND



**VERIFICATION**

Daniel G. Schmieg, Esquire, hereby states that he is the Attorney for the Plaintiff in this action, that he is authorized to make this Affidavit, and that the statements made in the foregoing MOTION FOR SERVICE PURSUANT TO SPECIAL ORDER OF COURT are true and correct to the best of his knowledge, information and belief.

The undersigned understands that the statements made are subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

Respectfully submitted,  
Phelan Hallinan & Schmieg, L.L.P.

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

Date: February 27, 2009

Phelan Hallinan & Schmieg, L.L.P.  
By: Daniel G. Schmieg, Esquire No. 62205  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

Attorney for Plaintiff

Citimortgage, Inc. S/B/M To ABN AMRO  
Mortgage Group, Inc.

: COURT OF COMMON PLEAS

:

: CIVIL DIVISION

vs.

Stephanie M. Johnson  
Matthew E. Johnson

: CLEARFIELD COUNTY

: NO. 2008-1939-CD

**CERTIFICATION OF SERVICE**

I, Daniel G. Schmieg, Esquire, hereby certify that a copy of the foregoing Motion for Service Pursuant to Special Order of Court, Memorandum of Law, Proposed Order and attached exhibits have been sent to the individual as indicated below by first class mail, postage prepaid, on the date listed below.

Stephanie M. Johnson  
999 Friendly Acres Road  
Curwensville, PA 16833

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

Respectfully submitted,  
Phelan Hallinan & Schmieg, L.L.P.

By: 

Daniel G. Schmieg, Esquire  
Attorney for Plaintiff

Date: February 27, 2009

IN THE COURT OF COMMON PLEAS  
CLEARFIELD COUNTY, PENNSYLVANIA

Citimortgage, Inc. S/B/M To ABN AMRO  
Mortgage Group, Inc.

vs.

Stephanie M. Johnson  
Matthew E. Johnson

:  
:  
: CIVIL DIVISION  
: NO. 2008-1939-CD  
:

:  
**ORDER**

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_, 2009, upon consideration of Plaintiff's Motion for Service Pursuant to Special Order of Court, it is hereby **ORDERED** and **DECREED** that said Motion is **GRANTED**.

It is further **ORDERED** and **DECREED** that Plaintiff may obtain service of the Complaint and all future pleadings on the above captioned Defendant, Stephanie M. Johnson, by:

1. Posting of the mortgaged premises, 999 Friendly Acres Road, Curwensville, PA 16833.
2. First class mail to Stephanie M. Johnson at the mortgaged premises, 999 Friendly Acres Road, Curwensville, PA 16833; and
3. Certified mail to Stephanie M. Johnson at the mortgaged premises 999 Friendly Acres Road, Curwensville, PA 16833.

**BY THE COURT:**

\_\_\_\_\_  
J.

Phelan Hallinan & Schmieg, LLP  
Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

ATTORNEY FOR PLAINTIFF

CITIMORTGAGE, INC. S/B/M TO ABN  
AMRO MORTGAGE GROUP, INC.  
Plaintiff

vs.

: COURT OF COMMON PLEAS  
:  
: CIVIL DIVISION  
:  
: CLEARFIELD COUNTY

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

Defendants

:  
: No. 2008-1939-CD  
:  
:  
:

**PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE**

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP

By: Francis S. Hallinan

Francis S. Hallinan, Esquire  
Lawrence T. Phelan, Esquire  
Daniel G. Schmieg, Esquire  
Attorneys for Plaintiff

Date: February 27, 2009

/sam, Svc Dept.  
File# 188640

FILED NO CC  
MAR 03 2009  
William A. Shaw  
Prothonotary/Clerk of Courts  
@ Reinstated to  
Atty

119  
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL DIVISION

CITIMORTGAGE, INC. S/B/M to ABN AMRO  
MORTGAGE GROUP, INC.,  
Plaintiff

vs.

STEPHANIE M. JOHNSON,  
MATTHEW E. JOHNSON,  
Defendants

\*  
\*  
\*  
\*  
\*  
\*  
\*

NO. 08-1939-CD

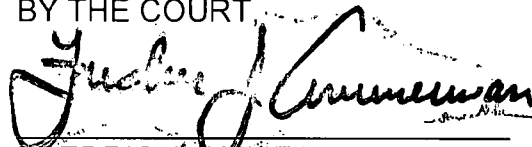
**ORDER**

NOW, this 2<sup>nd</sup> day of March, 2009, the Plaintiff is granted leave to serve the  
Complaint upon the Defendant **STEPHANIE M. JOHNSON** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield  
County Legal Journal;
2. By first class mail to 999 Friendly Acres Road, Curwensville, PA  
16833;
3. By certified mail, return receipt requested to 999 Friendly Acres  
Road, Curwensville, PA 16833; and
4. By posting the mortgaged premises known in this herein action as to  
999 Friendly Acres Road, Curwensville, PA 16833.

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

BY THE COURT



FREDRIC J. AMMERMAN  
President Judge

FILED 300

012:00601  
MAR 03 2009

Any Schmieg

(60)

William A. Shaw  
Prothonotary/Clerk of Courts

Phelan Hallinan & Schmieg, LLP  
Lawrence T. Phelan, Esq., Id. No. 32227  
Francis S. Hallinan, Esq., Id. No. 62695  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

ATTORNEY FOR PLAINTIFF

CITIMORTGAGE, INC. S/B/M TO ABN  
AMRO MORTGAGE GROUP, INC.  
Plaintiff

vs.

: COURT OF COMMON PLEAS  
:  
: CIVIL DIVISION  
:  
: CLEARFIELD COUNTY

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

Defendants

: No. 2008-1939-CD  
:  
:  
:

**PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE**

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP

By: Francis S. Hallinan

Francis S. Hallinan, Esquire  
Lawrence T. Phelan, Esquire  
Daniel G. Schmieg, Esquire  
Attorneys for Plaintiff

Date: April 1, 2009

/sam, Svc Dept.  
File# 188640

**FILED** m10:49  
APR 03 2009  
William A. Shaw  
Prothonotary/Clerk of Courts  
Atty.pd. 7:00  
1 Compl. Reinstated  
to Sheriff  
1 Compl. Reinstated  
to Atty

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1939-CD

CITIMORTGAGE, INC. s/b/m to ABN AMRO MORTGAGE GROUP, INC.

vs

SERVICE # 1 OF 1

STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON

COMPLAINT IN MORTGAGE FORECLOSURE, PRAECIPE & ORDER

SERVE BY: 05/03/2009

HEARING:

PAGE: 105498

DEFENDANT: STEPHANIE M. JOHNSON  
ADDRESS: 999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: POST ON PROPERTY

FILED

APR 06 2009

William A. Shaw  
Prothonotary/Clerk of Courts

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

**SHERIFF'S RETURN**

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE, PRAECIPE & ORDER ON STEPHANIE M. JOHNSON, DEFENDANT

BY HANDING TO \_\_\_\_\_ / \_\_\_\_\_

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

ADDRESS SERVED \_\_\_\_\_

NOW 4-6-09 AT 10:52 PM **POSTED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE, PRAECIPE & ORDER FOR STEPHANIE M. JOHNSON

AT (ADDRESS) 999 Friendly Acres Road  
Curwensville, Pa. 16833

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

I MAKE RETURN OF **NOT FOUND** AS TO STEPHANIE M. JOHNSON

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

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2009

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: James E. Davis  
Deputy Signature

James E. Davis  
Print Deputy Name

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

Citimortgage, Inc. S/B/M To ABN AMRO  
Mortgage Group, Inc.  
Plaintiff

ATTORNEY FOR PLAINTIFF

**FILED** *NO CC*  
*m/10:38 AM*  
**APR 13 2009**  
William A. Shaw  
Prothonotary/Clerk of Courts

: Court Of Common Pleas

vs.

: Civil Division

Stephanie M. Johnson  
Matthew E. Johnson

: Clearfield County

Defendant(s)

: No. 98-1939-CD

**AFFIDAVIT OF SERVICE OF COMPLAINT**  
**BY MAIL PURSUANT TO COURT ORDER**

I hereby certify that a true and correct copy of the Civil Action Complaint in Mortgage Foreclosure in the above captioned matter was sent by regular and certified mail, return receipt requested, to the following person, **Stephanie M. Johnson** at **999 Friendly Acres Road, Curwensville, PA 16833**, on April 10, 2009, in accordance with the Order of Court dated **March 2, 2009**. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

Date: April 9, 2009  
PHS#: 188640

Francis S. Hallinan  
FRANCIS S. HALLINAN, ESQUIRE  
Attorney for Plaintiff



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. 69349  
Judith T. Romano, Esq., Id. No. 58745  
Sheetal R. 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 J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

ATTORNEY FOR PLAINTIFF

CITIMORTGAGE, INC. S/E/M TO ABN : COURT OF COMMON PLEAS  
AMRO MORTGAGE GROUP, INC. :  
Plaintiff : CIVIL DIVISION

vs. : CLEARFIELD COUNTY

STEPHANIE M. JOHNSON :  
MATTHEW E. JOHNSON : No. 2008-1939-CD  
Defendants :

**PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE**

FILED  
MAY 21 2009  
William A. Shaw  
Prothonotary/Clerk of Courts  
1 Compl. Reinstated to Atty  
Any pd 7.00

TO THE PROTHONOTARY:

Kindly reinstate the Civil Action in Mortgage Foreclosure with reference to the above captioned matter.

PHELAN HALLINAN & SCHMIEG, LLP

By:  202331

Lawrence T. Phelan, Esquire  
Francis S. Hallinan, Esquire  
Daniel G. Schmieg, Esquire  
Michele M. Bradford, Esquire  
Judith T. Romano, Esquire  
Sheetal R. Shah-Jani, Esquire  
Jenine R. Davey, Esquire  
Lauren R. Tabas, Esquire  
Vivek Srivastava, Esquire  
Jay B. Jones, Esquire  
Peter J. Mulcahy, Esquire  
Andrew L. Spivack, Esquire  
Jaime McGuinness, Esquire  
Chrisovalante P. Fliakos, Esquire  
Joshua I. Goldman, Esquire  
Attorneys for Plaintiff

Date: May 20, 2009

/sam, Svc Dept.  
File# 183640

5 FILED NOCC  
m/11:03/64  
JUN 16 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

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 R. 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 J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., I.d. No.206779  
Andrew C. Bramblett, Esq. I.d. No. 208375  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

Attorneys for Plaintiff

Citimortgage, Inc. S/B/M To ABN AMRO  
Mortgage Group, Inc.

: Court Of Common Pleas

: Civil Division

vs.

: Clearfield County

Stephanie M. Johnson  
Matthew E. Johnson

: No. 2008-1939-CD

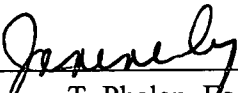
AFFIDAVIT OF SERVICE BY  
PUBLICATION IN ACCORDANCE WITH COURT ORDER

I hereby certify that service of the Civil Action Complaint in Mortgage Foreclosure was  
made in accordance with the Court Order dated March 2, 2009 as indicated below:

By publication as provided by Pa. R.C.P. Rule 430(b)(1) in Clearfield County Legal Journal of the Courts of Clearfield County on May 22, 2009 and The Progress on April 27, 2009. Proofs of the said publications are attached hereto.

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

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  
Peter J. Mulcahy, Esquire  
Andrew L. Spivack, Esquire  
Jaime McGuinness, Esquire  
Chrisovalante P. Fliakos, Esquire  
Joshua I. Goldman, Esquire  
Courtenay R. Dunn, Esquire  
Andrew C. Bramblett, Esquire  
Attorneys for Plaintiff

Date: June 15, 2009  
Service Dept.  
PHS#: 188640

NOTICE OF ACTION IN  
MORTGAGE FORECLOSURE  
IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION—LAW  
NO. 08-1939-CD

Citimortgage, Inc. S/B/M to ABN AMRO Mort-  
gage Group, Inc.

Vs.

Stephanie M. Johnson  
Matthew E. Johnson

NOTICE

To: Stephanie M. Johnson:

You are hereby notified that on October 10,  
2008, Plaintiff, Citimortgage, Inc. S/B/M to ABN  
AMRO Mortgage Group, Inc., filed a Mortgage  
Foreclosure Complaint endorsed with a Notice to  
Defend, against you in the Court of Common  
Pleas of Clearfield County Pennsylvania, dock-  
eted to No. 08-1939-CD. Wherein Plaintiff seeks  
to foreclose on the mortgage secured on your  
property located at 999 Friendly Acres Road,  
Curwensville, PA 16833 whereupon your prop-  
erty would be sold by the Sheriff of Clearfield  
County.

You are hereby notified to plead to the above  
referenced Complaint on or before 20 days from  
the date of this publication or a Judgment will be  
entered against you.

NOTICE

If you wish to defend, you must enter a written  
appearance personally or by attorney and file  
your defenses or objections in writing with the  
court. You are warned that if you fail to do so  
the case may proceed without you and a judg-  
ment may be entered against you without  
further notice for the relief requested by the  
plaintiff. You may lose money or property or  
other rights important to you.

YOU SHOULD TAKE THIS NOTICE 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 INFOR-  
MATION ABOUT HIRING A LAWYER.

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

CLEARFIELD COUNTY

DAVID S. MEHOLICK, COURT ADMINISTRATOR

CLEARFIELD COUNTY COURTHOUSE

CLEARFIELD, PA 16830

(814) 765-2641 x 5982

PENNSYLVANIA LAWYER REFERRAL SERVICE

PENNSYLVANIA BAR ASSOCIATION

100 SOUTH STREET

P.O. BOX 186

HARRISBURG, PA 17108

800-692-7375

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Theresa C. Knaresboro, Notary Public

City of DuBois, Clearfield County

My Commission Expires Aug. 26, 2011

Member, Pennsylvania Association of Notaries

Stephanie McAvey

Full Spectrum Services, Inc.

400 Fellowship Road, Ste. 220

Mount Laurel, NJ 08054

PROOF OF PUBLICATION

NIA :

:

LD :

f May AD 2009, before me, the subscriber, a Notary Public in  
state, personally appeared Gary A. Knaresboro editor of the  
Journal of the Courts of Clearfield County, and that the annexed  
or advertisement published in said publication in the regular  
, 2009, Vol. 21, No. 21. And that all of the allegations of this  
place, and character of the publication are true.



Gary A. Knaresboro, Esquire  
Editor

efore me the day and year aforesaid.



Phelan Hallinan & Schmieg, LLP

By: Lawrence T. Phelan, Esq., Id. No. 32227

Attorney for Plaintiff

NOTICE OF ACTION  
IN MORTGAGE FORECLOSURE  
IN THE COURT  
OF COMMON PLEAS  
OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
CIVIL ACTION-LAW  
COURT OF  
COMMON PLEAS  
CIVIL DIVISION  
CLEARFIELD COUNTY  
NO. 08-1939-CD

Citimortgage, Inc./  
S/B/M to  
ABN AMRO

Mortgage Group, Inc.  
Vs.

Stephanie M. Johnson  
Matthew E. Johnson

NOTICE

To: Stephanie M. Johnson:

You are hereby notified that on October 10, 2008, Plaintiff, Citimortgage, Inc. S/B/M to ABN AMRO Mortgage Group, Inc., filed a Mortgage Foreclosure Complaint endorsed with a Notice to Defend, against you in the Court of Common Pleas of Clearfield County Pennsylvania, docketed to No. 08-1939-CD. Wherein Plaintiff seeks to foreclose on the mortgage secured on your property located at 999 Friendly Acres Road, Curwensville, PA 16833 whereupon your property would be sold by the Sheriff of Clearfield County.

You are hereby notified to plead to the above referenced Complaint on or before 20 days from the date of this publication or a Judgment will be entered against you.

NOTICE

If you wish to defend, you must enter a written appearance personally or by attorney and file your defenses or objections in writing with the court. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you without further notice for the relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS NOTICE 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.

CLEARFIELD COUNTY  
DAVID S. MEHOLICK,  
COURT ADMINISTRATOR  
CLEARFIELD COUNTY  
COURTHOUSE  
CLEARFIELD, PA 16830  
PENNSYLVANIA LAWYER  
REFERRAL SERVICE  
PENNSYLVANIA  
BAR ASSOCIATION  
100 SOUTH STREET  
P.O. 186  
HARRISBURG, PA 17108  
1-800-692-7375

## PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :  
COUNTY OF CLEARFIELD : SS:

On this 27th day of April, A.D. 20 09, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Margaret E. Krebs, who being duly sworn according to law, deposes and says that she is the President of The Progressive Publishing Company, Inc., and Associate Publisher of The Progress, a daily newspaper published at Clearfield, in the County of Clearfield and State of Pennsylvania, and established April 5, 1913, and that the annexed is a true copy of a notice or advertisement published in said publication in

the regular issues of April 9, 2009  
And that the affiant is not interested in the subject matter of the notice or advertising, and that all of the allegations of this statement as to the time, place, and character of publication are true.

*Margaret E. Krebs*

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

*Cheryl J. Robison*  
Notary Public

Clearfield, Pa.

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Cheryl J. Robison, Notary Public  
Clearfield Boro, Clearfield County  
My Commission Expires Oct. 31, 2011

Member, Pennsylvania Association of Notaries

## RECIPE FOR IN REM JUDGMENT FOR FAILURE TO ANSWER AND ASSESSMENT OF DAMAGES

NOTARY:

er judgment in favor of the Plaintiff and against STEPHANIE M. MATTHEW E. JOHNSON, Defendant(s) for failure to file an Answer to  
unt within 20 days from service thereof and for foreclosure and sale of the  
es, and assess Plaintiff's damages as follows:

h in Complaint \$58,738.90

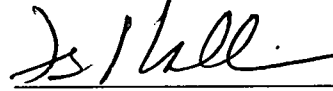
0/10/2008 to 06/26/2009

\$2,527.20

TOTAL

\$61,266.10

I hereby certify that (1) the Defendants' last known address is 999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833-7707, and (2) that notice has been given in accordance with Rule 237.1, copy attached.



Lawrence T. Phelan, Esquire

Francis S. Hallinan, Esquire

Daniel G. Schmieg, Esquire

Michele M. Bradford, Esquire

Judith T. Romano, Esquire

Sheetal R. Shah-Jani, Esquire

Jenine R. Davey, Esquire

Lauren R. Tabas, Esquire

Vivek Srivastava, Esquire

Jay B. Jones, Esquire

Peter J. Mulcahy, Esquire

Andrew L. Spivack, Esquire

Jaime McGuinness, Esquire

Chrisovalante P. Fliakos, Esquire

Joshua I. Goldman, Esquire

Courtenay R. Dunn, Esquire

Andrew C. Bramblett, Esquire

Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 7-2-09



cm

PHS # 188640

PROTHONOTARY

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  
Michele M. Bradford, Esq., Id. No. 69849  
Judith T. Romano, Esq., Id. No. 58745  
Sheetal R. 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 J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375

Attorney for Plaintiff

1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

<b>CITIMORTGAGE, INC. S/B/M TO ABN</b>	:	<b>CLEARFIELD COUNTY</b>
<b>AMRO MORTGAGE GROUP, INC.</b>	:	
	:	<b>COURT OF COMMON PLEAS</b>
	:	
<b>vs.</b>	:	<b>CIVIL DIVISION</b>
	:	
<b>STEPHANIE M. JOHNSON</b>	:	<b>No. 2008-1939-CD</b>
<b>MATTHEW E. JOHNSON</b>	:	

**VERIFICATION OF NON-MILITARY SERVICE**

Francis S. Hallinan, 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 STEPHANIE M. JOHNSON is over 18 years of age and resides at 999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833-7707.



(c) that defendant MATTHEW E. JOHNSON is over 18 years of age and resides at 999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833-7707.

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



Lawrence T. Phelan, Esquire

~~Francis S. Hallinan, Esquire~~ 62695

Daniel G. Schmieg, Esquire

Michele M. Bradford, Esquire

Judith T. Romanc, Esquire

Sheetal R. Shah-Jani, Esquire

Jenine R. Davey, Esquire

Lauren R. Tabas, Esquire

Vivek Srivastava, Esquire

Jay B. Jones, Esquire

Peter J. Mulcahy, Esquire

Andrew L. Spivack, Esquire

Jaime McGuinness, Esquire

Chrisovalante P. Fliakos, Esquire

Joshua I. Goldman, Esquire

Courtenay R. Dunn, Esquire

Andrew C. Bramblett, Esquire

Attorney for Plaintiff

CITIMORTGAGE, INC. S/B/M TO ABN  
AMRO MORTGAGE GROUP, INC.

vs.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

: CLEARFIELD COUNTY  
:  
: COURT OF COMMON PLEAS  
:  
:  
: CIVIL DIVISION  
:  
: No. 2008-1939-CD  
:  
:

COPIES

Notice is given that a Judgment in the above captioned matter has been entered  
against you on July 2, 2009

By William L. Johnson DEPUTY

If you have any questions concerning this matter please contact:

Bill  
Lawrence T. Phelan, Esquire  
Francis S. Hallinan, Esquire 62695  
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  
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Jaime McGuinness, Esquire  
Chrisovalante P. Fliakos, Esquire  
Joshua I. Goldman, Esquire  
Courtenay R. Dunn, Esquire  
Andrew C. Bramblett, 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. \*\****

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 R. Shah-Jani, Esq., Id. No. 81760  
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Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq. Id. No. 208375  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.

Plaintiff

v.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION

NO. 2008-1939-CD

CLEARFIELD COUNTY

TO: STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

**DATE OF NOTICE: June 12, 2009**

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 DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

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

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

Office of the Prothonotary  
Clearfield County Courthouse  
230 East Market Street  
Clearfield, PA 15853  
(814) 765-2641 x5988

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

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

By: 

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  
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215-563-7000

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.

Plaintiff

v.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION

NO. 2008-1939-CD

CLEARFIELD COUNTY

TO: MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

**DATE OF NOTICE: June 12, 2009**

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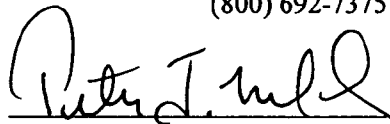
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By:



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Phelan Hallinan & Schmieg, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103

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

CITIMORTGAGE, INC. S/B/M TO  
ABN AMRO MORTGAGE GROUP,  
INC.

vs.

STEPHANIE M. JOHNSON

MATTHEW E. JOHNSON

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

No. 2008-1939-CD

PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)

To the PROTHONOTARY:

Issue writ of execution in the above matter:

Amount Due

Interest from 6/27/09 to Sale

Per diem \$

Add'l Costs

Writ Total

\$61,266.10

**Prothonotary costs** 156.00

\$ \_\_\_\_\_

\$3,001.21

\$

  
DANIEL G. SCHMIEG, ESQUIRE

JAY B. JONES, ESQUIRE

ANDREW L. SPIVACK, ESQUIRE

JENINE R. DAVEY, ESQUIRE

Attorney for Plaintiff

Note: Please attach description of Property.

188640

**FILED**

JUL 08 2009

William A. Shaw  
Prothonotary/Clerk of Courts

610  
Any pd. 20.00  
ICC @ 6 w/its  
w/prop. desc.  
to Sheriff



No. 2008-1939-CD.....

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.

vs.

STEPHANIE M. JOHNSON  
MATTEW E. JOHNSON

PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)

Filed:



DANIEL G. SCHMIEG, ESQUIRE  
JAY B. JONES, ESQUIRE  
ANDREW L. SPIVACK, ESQUIRE  
JENINE R. DAVEY, ESQUIRE  
Attorney for Plaintiff

Address: STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

MATTEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

FILED

JUL 08 2009

William A. Shaw  
Prothonotary/Clerk of Courts

~~DANIEL G. SCHMIEG, ESQUIRE~~  
~~JAY B. JONES, ESQUIRE~~  
ANDREW L. SPIVACK, ESQUIRE  
JENINE R. DAVEY, ESQUIRE  
Attorney for Plaintiff

• • • • •

**Plaintiff,**

**CIVIL DIVISION**

**NO. 2008-1939-CD**

• • •

None

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

NAME

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

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

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

**TENANT/OCCUPANT**

**999 FRIENDLEY ACRES ROAD  
CURWENSVILLE, PA 16833**

**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<sup>th</sup> Floor, Strawberry Sq., Dept 28061  
Harrisburg, PA 17128**

**Internal Revenue Service  
Federated Investors Tower**

**13<sup>TH</sup> 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**

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.

Date

**DANIEL G. SCHMIEG, ESQUIRE  
JAY B. JONES, ESQUIRE  
ANDREW L. SPIVACK, ESQUIRE  
JENINE R. DAVEY, ESQUIRE  
Attorney for Plaintiff**

COPY

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

CITIMORTGAGE, INC. S/B/M.TO  
ABN AMRO MORTGAGE GROUP,  
INC.

vs.

STEPHANIE M. JOHNSON

MATTHEW E. JOHNSON

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

No. 2008-1939-CD

WRIT OF EXECUTION  
(Mortgage Foreclosure)

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

PREMISES: 999 FRIENDLEY ACRES ROAD, CURWENSVILLE, PA 16833  
(See Legal Description attached)

Amount Due

Interest from 6/27/09 to Sale

Per diem \$

Add'l Costs

Writ Total

Prothonotary costs

\$61,255.10  
156.00

\$ \_\_\_\_\_

\$3,001.21

\$

*William L. Hagan*  
201

OFFICE OF THE PROTHONOTARY OF CLEARFIELD  
COUNTY, PENNSYLVANIA

Dated 7/8/09  
(SEAL)

No. 2008-1939-CD.....

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.

vs.

STEPHANIE M. JOHNSON  
MATTEW E. JOHNSON

WRIT OF EXECUTION  
(Mortgage Foreclosure)

Costs

Real Debt \$61,266.10

Int. from 6/27/09  
To Date of Sale (\$ per diem)

Costs

Prothy Pd.

156.00

Sheriff



DANIEL G. SCHMIEG, ESQUIRE  
JAY B. JONES, ESQUIRE  
ANDREW L. SPIVACK, ESQUIRE  
JENINE R. DAVEY, ESQUIRE

Attorney for Plaintiff

Address: STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

MATTEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

**LEGAL DESCRIPTION**

**ALL that certain lot or piece of ground situate in the Township of Penn, Clearfield County, Pennsylvania, bounded and described as follows:**

**BEGINNING at a post on line of public road, thence South seventy and one half (70 1/2 degrees) degrees West three hundred forty-four (344) feet to post on line of same public road; thence North five and one half (5 1/2 degrees) degrees East two hundred seventy-nine (279) feet to post on line now or formerly of G. L. Wood; thence South sixty-two and one fourth (62 1/4 degrees) degrees East three hundred forty-four (344) feet to place of beginning. Containing one (1) acre, more or less.**

TITLE TO SAID PREMISES IS VESTED IN Matthew E. Johnson and Stephanie M. Johnson, h/w, by Deed from Leo P. Krise, Sr. and Florence L. Krise, h/w and Christine A. Spencer and Raymond L. Spencer, her husband, dated 10/29/1998, recorded 10/30/1998 in Book 1981, Page 171.

Premises being: 999 FRIENDLEY ACRES ROAD  
CURWENSVILLE, PA 16833

Tax Parcel No. F10-000-00101

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 105498

NO: 08-1939-CD

SERVICES 1

COMPLAINT IN MORTGAGE FORECLOSURE, PRAECIPE & ORDER

PLAINTIFF: CITIMORTGAGE, INC. s/b/m to ABN AMRO MORTGAGE GROUP, INC.

vs.


DEFENDANT: STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	791896	10.00
SHERIFF HAWKINS	PHELAN	791896	15.60

*S*  
**FILED**  
*0/10:00Lm*  
**JUL 23 2009**

William A. Shaw   
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2009

\_\_\_\_\_

So Answers,



Chester A. Hawkins  
Sheriff



(12)

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.

Plaintiff,

v.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
Defendant(s)

: CLEARFIELD COUNTY  
:  
: COURT OF COMMON PLEAS  
:  
: CIVIL DIVISION  
:  
: No. 2008-1939-CD  
:

**FILED**

SEP 02 2009

William A. Shaw  
Prothonotary/Clerk of Courts

no C/C

AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129.1

COMMONWEALTH OF PENNSYLVANIA )  
CLEARFIELD COUNTY )

SS:

As required by Pa. R.C.P. 3129.1(a) Notice of Sale has been given to Lienholders and any known interested party in the manner required by Pa. R.C.P. 3129.2(c) on each of the persons or parties named, at that address, set forth on the Affidavit and as amended if applicable. A copy of the Certificate of Mailing (Form 3817) and/or Certified Mail Return Receipt stamped by the U.S. Postal Service is attached hereto Exhibit "A".


- [Signature]*
- ☐ 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
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  - ☐ Joshua I. Goldman, Esq., Id. No. 205047
  - ☐ Courtenay R. Dunn, Esq., Id. No. 206779
  - ☐ Andrew C. Bramblett, Esq., Id. No. 208375
- Attorney for Plaintiff

Date: 8/31/09

**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.

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

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee
1		TENANT/OCCUPANT 999 FRIENDLEY ACRES ROAD CURWENSVILLE, PA 16833		
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 <sup>th</sup> Floor, Strawberry Sq., Dept 28061 Harrisburg, PA 17128		
5		Internal Revenue Service, Federated Investors Tower 13 <sup>TH</sup> Floor, Suite 1300, 1001 Liberty Avenue Pittsburgh, PA 15222		
6		Department of Public Welfare, TPPL Casualty Unit Estate Recovery Program, P.O. Box 8486, Willow Oak Building Harrisburg, PA 17105		
7				
8				
9				
10				
11				
12		<b>Re: STEPHANIE M. JOHNSON JVS 188640 TEAM 3</b>		
Total Number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional insurance. See Domestic Mail Manual R900, S913 and S921 for limitations of coverage.

UNITED STATES POSTAGE  
  
 02 1M  
 0004218010  
**\$ 02.52<sup>00</sup>**  
 AUG 04 2009  
 MAILED FROM ZIP CODE 19103

PA 19103  
 AUG 4 2009  
 PHILADELPHIA

Phelan Hallinan & Schmieg, LLP  
Lawrence T. Phelan, Esq., Id. No. 32227  
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Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375

**FILED** NO CC  
OCT 27 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

CITIMORTGAGE, INC S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC

**Plaintiff,**

**v.**

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

**Defendant(s).**

**CLEARFIELD COUNTY  
COURT OF COMMON PLEAS**

**CIVIL DIVISION**

**NO. 08-1939-CD**

**AFFIDAVIT OF SERVICE OF NOTICE OF SHERIFF'S SALE  
PURSUANT TO P.R.C.P., 404(2)/403**

I hereby certify that a true and correct copy of the Notice of Sheriff Sale in the above captioned matter was sent by regular mail and certified mail, return receipt requested, to **STEPHANIE M. JOHNSON** on **AUGUST 27, 2009** at **999 FRIENDLY ACERS ROAD, CURWENSVILLE, PA 16833**, in accordance with the Order of Court dated **MARCH 2, 2009**. The property was posted on **SEPTEMBER 2, 2009**. Publication was advertised in **COURIER EXPRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT** on **AUGUST 31, 2009** & in **CLEARFIELD COUNTY LEGAL JOURNAL** on **OCTOBER 9, 2009**.

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

PHELAN HALLINAN & SCHMIEG, LLP

By: *Jane M. Jones*

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  
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Andrew L. Spivack, Esquire  
Peter J. Mulcahy, Esquire  
Jaime McGuinness, Esquire  
Chrisovalante P. Fliakos, Esquire  
Joshua I. Goldman, Esquire  
Courtenay R. Dunn, Esquire  
Andrew C. Bramblett, Esquire

Attorneys for Plaintiff

Dated: October 27, 2009

**PROOF OF PUBLICATION OF NOTICE APPEARING IN THE  
COURIER EXPRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT**

NOTICE OF ACTION IN MORTGAGE FORECLOSURE  
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
NO. 2008-1939-CD

CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE  
GROUP, INC.

vs.

STEPHANIE M. JOHNSON & MATTHEW E. JOHNSON

NOTICE TO: STEPHANIE M. JOHNSON

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

ALL THAT following described lot of ground situate, lying and  
being in PENN Township, County of CLEARFIELD Common-  
wealth of Pennsylvania, bounded and limited as follows, to wit:

Your house (real estate) at 999 FRIENDLY ACRES ROAD,  
CURWENSVILLE, PA 16833 is scheduled to be sold at the  
Sheriff's Sale on OCTOBER 2, 2009 at 10:00 AM. at the  
CLEARFIELD County Courthouse to enforce the Court Judg-  
ment of \$61,266.10 obtained by, CITIMORTGAGE, INC.  
S/B/M TO ABN AMRO MORTGAGE GROUP, INC. (the mort-  
gagee), against your Prop. sit. in PENN Township, County of  
CLEARFIELD, and State of Pennsylvania.

Being Premises: 999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

Improvements consist of residential property.

Sold as the property of STEPHANIE M. JOHNSON and  
MATTHEW E. JOHNSON

TERMS OF SALE: The purchaser at the sale must take ten  
(10%) percent down payment of the bid price or of the Sheriff's  
cost, whichever is higher, at the time of the sale in the form of  
cash, money order or bank check. The balance must be paid  
within ten (10) days of the sale or the purchaser will lose the  
down money.

THE HIGHEST AND BEST BIDDER SHALL BE THE BUYER:

Daniel Schmieg, Esquire  
One Penn Center at Suburban Station  
1617 John F. Kennedy Boulevard  
Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000  
Attorney for Plaintiff

**LEGAL DESCRIPTION**

ALL that certain lot or piece of ground situate in the Township  
of Penn, Clearfield County, Pennsylvania, bounded and de-  
scribed as follows:

BEGINNING at a post on line of public road, thence South sev-  
enty and one half (70 1/2 degrees) degrees West three hun-  
dred forty-four (344) feet to post on line of same public road;  
thence North five and one half (5 1/2 degrees) degrees East  
two hundred seventy-nine (279) feet to post on line now or for-  
merly of G. L. Wood; thence South sixty-two and one fourth  
(62 1/4 degrees) degrees East three hundred forty-four (344)  
feet to place of beginning. Containing one (1) acre, more or  
less.

**TITLE TO SAID PREMISES IS VESTED IN** Matthew E. John-  
son and Stephanie M. Johnson, h/w, by Deed from Leo P.  
Krise, Sr. and Florence L. Krise, h/w and Christine A. Spencer  
and Raymond L. Spencer, her husband, dated 10/29/1998, re-  
corded 10/30/1998 in Book 1981, Page 171.

8/31/09

**McLEAN PUBLISHING COMPANY,  
BOIS PENNSYLVANIA**

Approved May 16, 1929, P.L. 1784

SS:

ra, Classified Advertising Supervisor of the Courier-Express/Tri-  
e County and State aforesaid, being duly sworn, deposes and says that the  
County Sunday, a weekly newspaper and Jeffersonian Democrat, a  
shing Company at 500 Jeffers Street, City of DuBois, County and State  
79, since which date said, the daily publication and the weekly  
County, and that a copy of the printed notice of publication is attached  
lished in the regular editions of the paper on the following dates, viz: the

August A.D., 2009

ly authorized by the Courier-Express, a daily newspaper, Tri-County  
ian Democrat, a weekly newspaper to verify the foregoing statement  
interested in the subject matter of the aforesaid notice of publication, and  
to time, place and character of publication are true.

**ISHING COMPANY Publisher of  
UNTY SUNDAY/JEFFERSONIAN DEMOCRAT**

*[Signature]*

3<sup>rd</sup> day of Sept, 2009

*[Signature]*

NOTARY PUBLIC

ment of Advertising Cost  
**PUBLISHING COMPANY**

Publisher of

**RESS/TRI-COUNTY SUNDAY/  
SONIAN DEMOCRAT**

DuBois, PA

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Connie L. Booth, Notary Public  
City of DuBois, Clearfield County  
My Commission Expires Sept. 5, 2009

Member, Pennsylvania Association of Notaries

**ll Spectrum Services, Inc.**

or advertisement

bove stated dates..... **\$313.65**

..... **\$7.50**

..... **\$321.15**

**s Receipt for Advertising Costs**

ounty Sunday, a weekly newspaper, and/or Jeffersonian Democrat, a  
of the aforesaid advertising and publication costs, and certifies that the

et and Beaver Drive, DuBois, PA 15801

ied 1879, Phone 814-371-4200

**N PUBLISHING COMPANY**

Publisher of

**UNTY SUNDAY/JEFFERSONIAN DEMOCRAT**

Proof of Publication and receipt for the Advertising costs in the subject

ATTORNEY FOR

NOTICE OF ACTION IN  
MORTGAGE FORECLOSURE  
IN THE COURT OF COMMONPLEAS  
OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
No. 2008-1939-CD

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

COUNTY OF CLEARFIELD :

On this 9th day of October AD 2009, before me, the subscriber in and for said County and State, personally appeared Gary A. Knaresbo, Editor of the Clearfield County Legal Journal of the Courts of Clearfield County, is a true copy of the notice or advertisement published in said publication issues of Week of October 9, 2009, Vol. 21, No. 41. And that all of this statement as to the time, place, and character of the publication.

  
Gary A. Knaresbo  
Editor

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

  
Notary Public  
My Commission Expires

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Amy Mae Gardner, Notary Public  
City of DuBois, Clearfield County  
My Commission Expires May 28, 2013  
Member, Pennsylvania Association of Notaries

Brendan Booth  
Full Spectrum Services, Inc.  
400 Fellowship Rd, Suite 220  
Mt. Laurel, NJ 08054

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.

vs.

STEPHANIE M. JOHNSON & MATTHEW E.  
JOHNSON

NOTICE TO: STEPHANIE M. JOHNSON  
NOTICE OF SHERIFF'S SALE OF REAL PROP-  
ERTY

ALL THAT following described lot of ground situ-  
ate, lying and being in PENN Township, County of  
CLEARFIELD Commonwealth of Pennsylvania,  
bounded and limited as follows, to wit:

Your house (real estate) at 999 FRIENDLY  
ACRES ROAD, CURWENSVILLE, PA 16833, is  
scheduled to be sold at the Sheriff's Sale on OC-  
TOBER 2, 2009 AT 10:00a.m., at the CLEAR-  
FIELD County Courthouse to enforce the OCurt  
judgment of \$61,266.10 obtained by, CITIMORT-  
GAGE, INC. S/B/M TO ABN AMRO MORTGAGE  
GROUP, INC. (the mortgagee), against your prop.  
Sit. In PENN Township, County of CLEARFIELD,  
and State of Pennsylvania.

Being Premises: 999 FRIENDLY ACRES ROAD,  
CURWENSVILLE, PA 16833

Improvements consist of residential property.

Sold as the property of STEPHANIE M. JOHNSON  
& MATTHEW E. JOHNSON

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take ten (10%) percent down payment of the bid  
price or of the Sheriff's cost, whichever is higher,  
at the time of the sale in the form of cash, money  
order, or bank check. The balance must be paid  
within ten (10) days of the sale or the purchaser  
will lose the down money.

THE HIGHEST AND BEST BIDDER SHALL BE  
THE BUYER

Daniel Schmeig, Esquire

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard

Suite 1400

Philadelphia, PA 19103

(215) 563-7000

Attorney for Plaintiff

LEGAL DESCRIPTION

ALL that certain lot or piece of ground stuate in  
the Township of Penn, Clearfield County, Penn-  
sylvania, bounded and described as follows:

BEGINNING at a post on line of public road,  
thence South seventy and one half (70 1/2 de-  
grees) degrees West three hundred forty-four  
(344) feet to post on line of same public road;  
thence North five and one half (5 1/2 degrees)  
degrees East two hundred seventy-nine (279)  
feet to a post on line now or formerly of G.L.

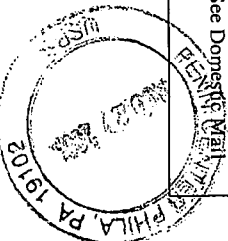
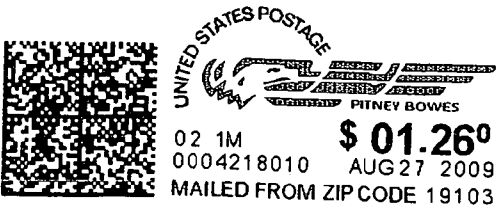
Wood; thence South sixty-two and one forth (62  
1/4 degrees) degrees East three hundred forty-  
four (344) feet to place of beginning. Containing  
one (1) acre, more or less.

TITLE TO SAID PREMISES IS VESTED IN  
Matthew E. Johnson and Stephanie M. John-  
son, h/w, by Deed from Leo P. Krise, Sr. and  
Florence L. Krise, h/w, and Christine A.  
Spencer and Raymond L. Spencer, her hus-  
band, dated 10/29/1998, recorded 10/30/1998  
in Book 1981, Page 171.

Name and Address of Sender

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

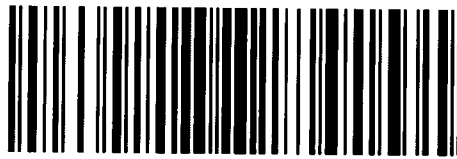
Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage
1		STEPHANIE M. JOHNSON 999 FRIENDLEY ACRES ROAD CURWENSVILLE, PA 16833	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12		Re: STEPHANIE M. JOHNSON JUN 188640 TEAM 4	
Total Number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)
		The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional insurance. See Domestic Mail Manual R900, S913 and S921 for limitations of coverage.	



TEAM 4

TEAM 4

TEAM 4



7178 2417 6099 0035 8328

4 / JJN  
STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-0000

--fold here (regular)

-- fold here (6x9)

--fold here (regular)

[Home](#) | [Help](#)[Track & Confirm](#)

## Track & Confirm

### Search Results

Label/Receipt Number: 7178 2417 6099 0035 8328

Class: **First-Class Mail®**Service(s): **Return Receipt Electronic**Status: **Delivered**

Your item was delivered at 4:13 PM on September 1, 2009 in  
CURWENSVILLE, PA 16833.

#### Detailed Results:

- Delivered, September 01, 2009, 4:13 pm, CURWENSVILLE, PA 16833
- Notice Left, August 29, 2009, 10:58 am, CURWENSVILLE, PA 16833
- Processed through Sort Facility, August 27, 2009, 8:57 pm, PHILADELPHIA, PA 19176
- Acceptance, August 27, 2009, 4:50 pm, PHILADELPHIA, PA 19102
- Electronic Shipping Info Received, August 27, 2009

### Notification Options

#### Return Receipt (Electronic)

Verify who signed for your item by email. [Go >](#)[Track & Confirm](#)

Enter Label/Receipt Number.

[Site Map](#)[Customer Service](#)[Forms](#)[Gov't Services](#)[Careers](#)[Privacy Policy](#)[Terms of Use](#)[Business Customer Gateway](#)

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No FEAR Act EEO Data

FOIA

The United States Postal Service  
is an Equal Opportunity EmployerThe United States Postal Service  
is an Equal Opportunity Employer



**AFFIDAVIT OF SERVICE**

**PLAINTIFF**

**CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.**

**CLEARFIELD County  
No. 2003-1939-CD  
Our File #: 188640**

**DEFENDANT(S)**

**STEPHANIE M. JOHNSON  
MATTEW E. JOHNSON**

**Type of Action  
- Notice of Sheriff's Sale**

**\*\*\*PLEASE POST PROPERTY FOR STEPHANIE M.  
JOHNSON, PER COURT ORDER\*\*\***

**Sale Date: OCTOBER 2, 2009**

**SERVE AT:**

**999 FRIENDLEY ACRES ROAD  
CURWENSVILLE, PA 16833**

**SERVED**

Served and made known to Stephanie M. Johnson, Defendant, on the 2<sup>nd</sup> day of SEPTEMBER, 2009, at 5:07 o'clock P.m., at 999 FRIENDLEY ACRES Rd., Curwensville, PA 16833

Commonwealth of Pennsylvania, in the manner described below:

☐ Defendant personally served.  
☐ Adult family member with whom Defendant(s) reside(s). Relationship is \_\_\_\_\_  
☐ Adult in charge of Defendant(s)'s residence who refused to give name or relationship.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant(s)'s office or usual place of business.  
☐ \_\_\_\_\_ an officer of said Defendant(s)'s company.  
☒ Other: POSTING

Description: Age \_\_\_\_\_ Height \_\_\_\_\_ Weight \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_ Other \_\_\_\_\_

I, D. M. ELLIS, a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed  
before me this 3<sup>rd</sup> day  
of SEPT, 2009

Notary:

By:

D. M. Ellis

**NOT SERVED**

**\*\*\*ATTEMPT SERVICE NLT THREE (3) TIMES\*\*\***

On the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_m., Defendant **NOT FOUND** because:

☐ Moved ☐ Unknown ☐ No Answer ☐ Vacant

1st attempt Date: \_\_\_\_\_ Time: \_\_\_\_\_, 2nd attempt Date: \_\_\_\_\_ Time: \_\_\_\_\_, 3rd attempt Date: \_\_\_\_\_ Time: \_\_\_\_\_.

Other: \_\_\_\_\_

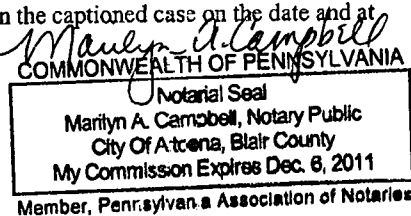
Sworn to and subscribed  
before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 200\_\_\_\_.

Notary:

By:

**Attorney for Plaintiff**

**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**



**RUSH**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 21001  
NO: 08-1939-CD

PLAINTIFF: CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC.  
vs.  
DEFENDANT: MATTHEW E. JOHNSON AND STEPHANIE M. JOHNSON

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 7/8/2009

LEVY TAKEN 7/29/2009 @ 2:10 PM

POSTED 7/29/2009 @ 2:05 PM

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 3/24/2010

DATE DEED FILED NOT SOLD

**FILED**  
010:59:01  
MAR 24 2010  
William A. Shaw  
Prothonotary/Clerk of Courts

DETAILS

8/11/2009 @ SERVED STEPHANIE M. JOHNSON

SERVED STEPHANIE M. JOHNSON, DEFENDANT, BY REG & CERT MAIL TO 999 FRIENDLY ACRES ROAD, CURWENSVILLE, PENNSYLVANIA CERT #70083230000335908089 SIGNED FOR BY MATT JOHNSON

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF THE LEVY.

8/10/2009 @ 2:05 PM SERVED MATTHEW E. JOHNSON

SERVED MATTHEW E. JOHNSON, DEFENDANT, AT CLEARFIELD COUNTY COURTHOUSE, 1 NORTH SECOND STREET, CLEARFIELD, PENNSYLVANIA BY HANDING TO MATTHWE E. JOHNSON

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE, AND COPY OF THE LEVY AND BY MAKING KNOW TO HIM / HER THE CONTENTS THEREOF.

@ SERVED

NOW, OCTOBER 1, 2009 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED FOR OCTOBER 2, 2009 TO DECEMBER 4 2009, DUE TO AN ACTIVE HOLD.

@ SERVED

NOW, DECEMBER 3, 2009 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED FOR DECEMBER 4, 2009 TO FEBRUARY 5, 2010, DUE TO ACTIVE HOLD.

@ SERVED

NOW, FEBRUARY 3, 2010 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO STAY THE SHERIFF SALE SCHEDULED FOR FEBRUARY 5, 2010 DUE TO LOSS MITIGATION, \$394.74 WAS RECEIVED TO CURE THE DEFAULT.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 21001  
NO: 08-1939-CD

PLAINTIFF: CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC.

vs.

DEFENDANT: MATTHEW E. JOHNSON AND STEPHANIE M. JOHNSON

Execution REAL ESTATE


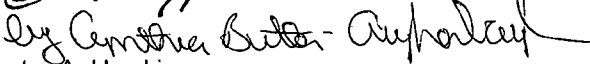
SHERIFF RETURN

---

SHERIFF HAWKINS \$226.93

SURCHARGE \$40.00 PAID BY ATTORNEY

So Answers,

  
  
Chester A. Hawkins  
Sheriff

WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)

Pa.R.C.P. 3180-3183 and Rule 3257

CITIMORTGAGE, INC. S/B/M TO  
ABN AMRO MORTGAGE GROUP,  
INC.

vs.

STEPHANIE M. JOHNSON

MATTHEW E. JOHNSON

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

No. 2008-1939-CD

WRIT OF EXECUTION  
(Mortgage Foreclosure)

PREMISES: 999 FRIENDLEY ACRES ROAD, CURWENSVILLE, PA 16833  
(See Legal Description attached)

Amount Due

Interest from 6/27/09 to Sale

Per diem \$

Add'l Costs

Writ Total

Prothonotary costs \$61,266.10  
156.00

\$

\$3,001.21

\$

OFFICE OF THE PROTHONOTARY OF CLEARFIELD  
COUNTY, PENNSYLVANIA

Dated 7/8/09  
(SEAL)

188640

Received this writ this 8th day  
of July A.D. 2009  
At 3:00 A.M./P.M.

Charles A. Hunkeler  
Sheriff By Cynthia Butler, Deputy

No. 2008-1939-CD.....

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.

vs.

STEPHANIE M. JOHNSON  
MATTEW E. JOHNSON

WRIT OF EXECUTION  
(Mortgage Foreclosure)


	Costs
Real Debt	\$61,266.10

Int. from 6/27/09  
To Date of Sale (\$ per diem)

Costs

Prothy Pd. 156.00

Sheriff

  
DANIEL G. SCHMIEG, ESQUIRE  
JAY B. JONES, ESQUIRE  
ANDREW L. SPIVACK, ESQUIRE  
JENINE R. DAVEY, ESQUIRE  
Attorney for Plaintiff

Address: STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

MATTEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

LEGAL DESCRIPTION

ALL that certain lot or piece of ground situate in the Township of Penn, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post on line of public road, thence South seventy and one half (70 1/2 degrees) degrees West three hundred forty-four (344) feet to post on line of same public road; thence North five and one half (5 1/2 degrees) degrees East two hundred seventy-nine (279) feet to post on line now or formerly of G. L. Wood; thence South sixty-two and one fourth (62 1/4 degrees) degrees East three hundred forty-four (344) feet to place of beginning. Containing one (1) acre, more or less.

TITLE TO SAID PREMISES IS VESTED IN Matthew E. Johnson and Stephanie M. Johnson, h/w, by Deed from Leo P. Krise, Sr. and Florence L. Krise, h/w and Christine A. Spencer and Raymond L. Spencer, her husband, dated 10/29/1998, recorded 10/30/1998 in Book 1981, Page 171.

Premises being: 999 FRIENDLEY ACRES ROAD  
CURWENSVILLE, PA 16833

Tax Parcel No. F10-000-00101

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

CITIMORTGAGE, INC. S/B/M to ABN AMRO  
MORTGAGE GROUP, INC.,  
Plaintiff

vs.

STEPHANIE M. JOHNSON,  
MATTHEW E. JOHNSON,  
Defendants

\*  
\*  
\*  
\*  
\*  
\*  
\*

Copy  
NO-08-1939-CD

ORDER

NOW, this 2<sup>nd</sup> day of March, 2009, the Plaintiff is granted leave to serve the  
Complaint upon the Defendant **STEPHANIE M. JOHNSON** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield  
County Legal Journal;
2. By first class mail to 999 Friendly Acres Road, Curwensville, PA  
16833;
3. By certified mail, return receipt requested to 999 Friendly Acres  
Road, Curwensville, PA 16833; and
4. By posting the mortgaged premises known in this herein action as to  
999 Friendly Acres Road, Curwensville, PA 16833.

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

BY THE COURT,

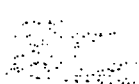
/S/ Fredric J Ammerman

FREDRIC J. AMMERMAN  
President Judge

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

MAR 03 2009

Attest.



William L. Brown  
Prothonotary/  
Clerk of Courts

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

2. Article Number  
(Transfer from service label)

7008 3230 0003 3590 8089

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-154

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

*MAH Johnson*

☐ Agent

☐ Addressee

B. Received by (Printed Name)

MAH JOHNSON

C. Date of Delivery

8-11-09

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

3. Service Type

☐ Certified Mail ☐ Express Mail

☐ Registered ☐ Return Receipt for Merchandise

☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

U.S. Postal Service™

**CERTIFIED MAIL™ RECEIPT**

(Domestic Mail Only; No Insurance Coverage Provided)

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

**OFFICIAL USE**

Postage

\$

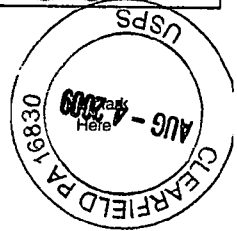
Certified Fee

Return Receipt Fee  
(Endorsement Required)

Restricted Delivery Fee  
(Endorsement Required)

Total Postage & Fees

\$ 5.71



Sent To

Street, Apt. No.,  
or PO Box No.

STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD

City, State, ZIP+4

CURWENSVILLE, PA 16833

PS Form 3800, August 2006

See Reverse for Instructions

7008 3230 0003 3590 8089



**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME STEPHANIE M. JOHNSON

NO. 08-1939-CD

NOW, March 23, 2010, 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 , I exposed the within described real estate of Matthew E. Johnson And Stephanie M. Johnson to public venue or outcry at which time and place I sold the same to he/she being the highest bidder, for the sum of \$394.74 and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	15.00
SERVICE	15.00
MILEAGE	6.60
LEVY	15.00
MILEAGE	6.60
POSTING	15.00
CSDS	10.00
COMMISSION	7.89
POSTAGE	14.24
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	
ADD'L POSTING	
ADD'L MILEAGE	6.60
ADD'L LEVY	
BID/SETTLEMENT AMOUNT	394.74
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	20.00
MISCELLANEOUS	
<b>TOTAL SHERIFF COSTS</b>	<b>\$226.93</b>

**DEED COSTS:**

ACKNOWLEDGEMENT	
REGISTER & RECORDER	
TRANSFER TAX 2%	0.00
<b>TOTAL DEED COSTS</b>	<b>\$0.00</b>

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	61,266.10
INTEREST @	0.00
FROM TO	
ATTORNEY FEES	
PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	40.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	3,001.21
<b>TOTAL DEBT AND INTEREST</b>	<b>\$64,307.31</b>

**COSTS:**

ADVERTISING	243.25
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	200.00
ACKNOWLEDGEMENT	
DEED COSTS	0.00
SHERIFF COSTS	226.93
LEGAL JOURNAL COSTS	189.00
PROTHONOTARY	156.00
MORTGAGE SEARCH	80.00
MUNICIPAL LIEN	

<b>TOTAL COSTS</b>	<b>\$1,095.18</b>
--------------------	-------------------

DISTRIBUTION WILL BE MADE IN ACCORDANCE WITH THE ABOVE SCHEDULE UNLESS EXCEPTIONS ARE FILED WITH THIS OFFICE **WITHIN TEN (10) DAYS FROM THIS DATE.**

CHESTER A. HAWKINS, Sheriff

**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**

Representing Lenders in  
Pennsylvania and New Jersey.

Foreclosure Manager

October 1, 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: CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC. v.  
STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833-7707  
Court No. 2008-1939-CD

Dear Sir/Madam:

Please Postpone the Sheriff Sale of the above referenced property, which is  
scheduled for October 2, 2009 due to the following: Active Hold.

The Property is to be relisted for the December 4, 2009 Sheriff Sale.

Thank you for your cooperation in this matter.

Very Truly Yours,  
REGINALD SMITH for  
Phelan Hallinan & Schmieg, LLP

**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**

Representing Lenders in  
Pennsylvania and New Jersey

Foreclosure Manager

December 3, 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: CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC. v.  
STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833-7707  
Court No. 2008-1939-CD

Dear Sir/Madam:

Please Postpone the Sheriff Sale of the above referenced property, which is scheduled for December 4, 2009 due to the following: Active Hold.

The Property is to be relisted for the February 5, 2010 Sheriff Sale.

Thank you for your cooperation in this matter.

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

**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**

Representing Lenders in  
Pennsylvania and New Jersey

Foreclosure Manager

February 3, 2010

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

Attn: Real Estate Department

Fax Number: 814-765-5915

Re: CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC. v.  
STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833-7707  
Court No. 2008-1939-CD

Dear Sir/Madam:

Please STAY the Sheriff's Sale of the above referenced property, which is scheduled for February 5, 2010 due to the following: Loss Mitigation.

\$394.74 was received in consideration of the stay.

You are hereby directed to immediate discontinue the advertising of the sale and processing or posting of the Notice of Sale.

Please return the original Writ of Execution to the Prothonotary as soon as possible. In addition, please forward a copy of the cost sheet pertaining to this sale to our office via facsimile to 215-567-0072 or regular mail at your earliest convenience.

Thank you for your cooperation in this matter.

Very Truly Yours,  
PATRICK WIRT for  
Phelan Hallinan & Schmieg, LLP

PRAECIPE FOR WRIT OF EXECUTION – (MORTGAGE FORECLOSURE)

Pa.R.C.P. 3180-3183

CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE  
GROUP, INC.

vs.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 2008-1939-CD

CLEARFIELD COUNTY

To the PROTHONOTARY:

Issue writ of execution in the above matter:

Amount Due	\$61,266.10
Interest from 06/27/2009 to Sale	\$ _____
Per diem \$10.07	
Add'l Costs	\$6,178.82
Writ Total	\$ _____
Prothonotary costs	176.00

Attorney for Plaintiff

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 R. 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 J. Mulcahy, Esq., Id. No. 61791
- ☐ Andrew L. Spivack, Esq., Id. No. 84439
- ☐ Jaime McGuinness, Esq., Id. No. 90134
- ☐ Chrisovalante P. Fliakos, Esq., Id. No. 94620
- ☐ Joshua I. Goldman, Esq., Id. No. 205047
- ☐ Courtenay R. Dunn, Esq., Id. No. 206779
- ☒ Andrew C. Bramblett, Esq., Id. No. 208375

Note: Please attach description of Property.

PHS # 188640

FILED

AUG 16 2010

William A. Shaw  
Prothonotary/Clerk of Courts

Att'y ad.  
\$20.00  
rec'd & lewintz  
w/prop. desc.  
to Sheriff  
(66)

No. 2008-1939-CD

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC.

vs.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage Foreclosure)

Filed:



Attorney for Plaintiff

**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 R. Shah-Jani, Esq., Id. No. 81760
- ☐ Jenine R. Davey, Esq., Id. No. 87077
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- ☐ Joshua I. Goldman, Esq., Id. No. 205047
- ☐ Courtenay R. Dunn, Esq., Id. No. 206779
- ☒ Andrew C. Bramblett, Esq., Id. No. 208375

Address where papers may be served:  
STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

**FILED**

AUG 16 2010

William A. Shaw  
Prothonotary/Clerk of Courts

**Phelan Hallinan & Schmieg, LLP**  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

Attorneys for Plaintiff

**CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE  
GROUP, INC.**

Plaintiff

v.

**STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON**

Defendant(s)

: **COURT OF COMMON PLEAS**

:

: **CIVIL DIVISION**

:

: **NO. 2008-1939-CD**

:

: **CLEARFIELD COUNTY**

:


:

**CERTIFICATION**

The undersigned attorney hereby states that he/she 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:

- ( ) the mortgage is an FHA Mortgage
- ( ) the premises is non-owner occupied
- ( ) the premises is vacant
- (X) 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.

By:   
Attorney for Plaintiff

**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 R. Shah-Jani, Esq., Id. No. 81760
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- ☐ Vivek Srivastava, Esq., Id. No. 202331
- ☐ Jay B. Jones, Esq., Id. No. 86657
- ☐ Peter J. Mulcahy, Esq., Id. No. 61791
- ☐ Andrew L. Spivack, Esq., Id. No. 84439
- ☐ Jaime McGuinness, Esq., Id. No. 90134
- ☐ Chrisovalante P. Fliakos, Esq., Id. No. 94620
- ☐ Joshua I. Goldman, Esq., Id. No. 205047
- ☐ Courtenay R. Dunn, Esq., Id. No. 206779
- ☒ Andrew C. Bramblett, Esq., Id. No. 208375

**CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.**

Plaintiff

**STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON**

Defendant(s)

: **COURT OF COMMON PLEAS**  
:  
: **CIVIL DIVISION**  
:  
: **NO. 2008-1939-CD**  
:  
: **CLEARFIELD COUNTY**  
  
**PHS # 188640**

**AFFIDAVIT PURSUANT TO RULE 3129.1**

**CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC.**, Plaintiff in the above action, by the undersigned attorney, sets forth as of the date the Praecipe for the Writ of Execution was filed, the following information concerning the real property located at **999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833-7707**.

1. Name and address of Owner(s) or reputed Owner(s):  
Name Address (if address cannot be reasonably  
ascertained, please so indicate)  
  
**STEPHANIE M. JOHNSON 999 FRIENDLY ACRES ROAD**  
**CURWENSVILLE, PA 16833-7707**  
  
**MATTHEW E. JOHNSON 999 FRIENDLY ACRES ROAD**  
**CURWENSVILLE, PA 16833-7707**
2. Name and address of Defendant(s) in the judgment:  
Name Address (if address cannot be reasonably  
ascertained, please so indicate)  
  
**SAME AS ABOVE**
3. Name and last known address of every judgment creditor whose judgment is a record lien on the real property to be sold:  
Name Address (if address cannot be  
reasonably ascertained, please indicate)  
  
**None.**
4. Name and address of last recorded holder of every mortgage of record:  
Name Address (if address cannot be  
reasonably ascertained, please indicate)  
  
**None.**
5. Name and address of every other person who has any record lien on the property:  
Name Address (if address cannot be  
reasonably ascertained, please 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 Address (if address cannot be  
reasonably ascertained, please indicate)  
  
**None.**



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

Name

Address (if address cannot be reasonably ascertained, please indicate)

**TENANT/OCCUPANT**

**999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707**

**DOMESTIC RELATIONS  
CLEARFIELD COUNTY**

**CLEARFIELD COUNTY COURTHOUSE  
230 EAST MARKET STREET  
CLEARFIELD, PA 16830**

**Commonwealth of Pennsylvania  
Department of Welfare**

**P.O. Box 2675  
Harrisburg, PA 17105**

**Internal Revenue Service Advisory**

**1000 Liberty Avenue Room 704  
Pittsburgh, PA 15222**

**U.S. Department of Justice  
Michael C. Colville, Esquire,  
United States Attorney**

**Western District of PA  
633 U.S. Post Office & Courthouse  
Pittsburgh, PA 15219**

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

12  
August 11, 2010

By: 

Attorney for Plaintiff

**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
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- ☐ 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 J. Mulcahy, Esq., Id. No. 61791
- ☐ Andrew L. Spivack, Esq., Id. No. 84439
- ☐ Jaime McGuinness, Esq., Id. No. 90134
- ☐ Chrisovalante P. Fliakos, Esq., Id. No. 94629
- ☐ Joshua I. Goldman, Esq., Id. No. 205047
- ☐ Courtenay R. Dunn, Esq., Id. No. 206779
- ☒ Andrew C. Bramblett, Esq., Id. No. 208375

WRIT OF EXECUTION – (MORTGAGE FORECLOSURE)

Pa.R.C.P. 3180-3183 and Rule 3257

COPY

CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE  
GROUP, INC.

COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 2008-1939-CD

CLEARFIELD COUNTY

vs.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

PREMISES: 999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833-7707  
(See Legal Description attached)

Amount Due

Interest from 06/27/2009 to Sale  
Per diem \$10.07  
Add'l Costs  
Writ Total

Prothonotary costs

\$61,266.10

176.00

\$ \_\_\_\_\_

\$6,178.82

\$ \_\_\_\_\_

OFFICE OF THE PROTHONOTARY OF CLEARFIELD  
COUNTY, PENNSYLVANIA

Dated 8/16/10  
(SEAL)

PHS # 188640

IN THE COURT OF COMMON PLEAS OF  
CLERFELD COUNTY, PENNSYLVANIA

CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC.

vs.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

WRIT OF EXECUTION  
(Mortgage Foreclosure)

Costs  
\$61,266.10

Real Debt  
Int. from

To Date of Sale (\$10.07 per diem)

Costs

Prothy Pd.

Sheriff

176.00

Filed

Attorney for Plaintiff

**Phelan Hallinan & Schmieg, LLP**

- ☐ Lawrence I. 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 R. 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
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- ☐ Jaime McGuinness, Esq., Id. No. 90134
- ☐ Chrisovalante P. Fliakos, Esq., Id. No. 94620
- ☐ Joshua I. Goldman, Esq., Id. No. 205047
- ☐ Courtenay R. Dunn, Esq., Id. No. 206779
- ☒ Andrew C. Bramblett, Esq., Id. No. 208375

Address where papers may be served:

STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

### **LEGAL DESCRIPTION**

ALL that certain lot or piece of ground situate in the Township of Penn, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post on line of public road, thence South seventy and one half (70 1/2) degrees West three hundred forty-four (344) feet to post on line of same public road; thence North five and one half (5 1/2) degrees East two hundred seventy-nine (279) feet to post on line now or formerly of G. L. Wood; thence South sixty-two and one fourth (62) degrees East three hundred forty-four (344) feet to place of beginning. Containing one (1) acre, more or less.

TITLE TO SAID PREMISES IS VESTED IN Matthew E. Johnson and Stephanie M. Johnson, h/w, by Deed from Leo P. Krise, Sr. and Florence L. Krise, h/w and Christine A. Spencer and Raymond L. Spencer, her husband, dated 10/29/1998, recorded 10/30/1998 in Book 1981, Page 171.

Premises being: 999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

Tax Parcel No. 125-F10-000-00101

**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  
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Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

Attorney for Plaintiff

**FILED**  
OCT 22 2010  
William A. Shaw  
Prothonotary/Clerk of Courts  
NO CC  
610

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.

Plaintiff

v.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

Defendants

CLEARFIELD COUNTY  
COURT OF COMMON PLEAS  
CIVIL DIVISION  
NO. 2008-1939-CD

**MOTION FOR SERVICE OF NOTICE OF SALE  
PURSUANT TO SPECIAL ORDER OF COURT**

Plaintiff, by its counsel, Phelan Hallinan & Schmieg, LLP, petitions this Honorable Court for  
an Order directing service of the Notice of Sale upon the above-captioned Defendant,

**MATTHEW E. JOHNSON**, by certified mail and regular mail to 999 FRIENDLY ACRES  
ROAD, CURWENSVILLE, PA 16833, and posting 999 FRIENDLY ACRES ROAD,

CURWENSVILLE, PA 16833 and in support thereof avers the following:

1. A Sheriff's Sale of the mortgaged property involved herein has been scheduled for **DECEMBER 3, 2010.**
2. Pennsylvania Rule of Civil Procedure (Pa.R.C.P.) 3129.2 requires that the Defendants be served with a notification of Sheriff's Sale at least thirty (30) days prior to the scheduled sale date.
3. Attempts to serve Defendant with the Notice of Sale have been unsuccessful, as indicated by the Return of Service attached hereto as Exhibit "A".
4. Pursuant to Pa.R.C.P. 430, Plaintiff has made a good faith effort to locate the Defendant. An Affidavit of Reasonable Investigation setting forth the specific inquiries made and the results therefrom is attached hereto as Exhibit "B".

WHEREFORE, Plaintiff respectfully requests that the allowance of service of the Notice of Sale in accordance with Pa.R.C.P., Rule 430 by certified and regular mail to 999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833 and posting 999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833.

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  
Michele M. Bradford, Esq., Id. No. 69849  
Judith T. Romano, Esq., Id. No. 58745  
Sheetal R. 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 J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375  
Attorneys for Plaintiff

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  
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Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

CITIMORTGAGE, INC. S/B/M TO ABN AMRO :  
MORTGAGE GROUP, INC. :

V.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

CLEARFIELD COUNTY  
COURT OF COMMON PLEAS  
  
CIVIL DIVISION  
  
NO. 2008-1939-CD

The written notice shall be prepared by the plaintiff, shall contain the same information as



the handbills or may consist of the handbill and shall be served at least thirty days before the sale on all persons whose names and addresses are set forth in the affidavit required by Rule 3129.1.

- (1) Service of the Notice shall be made:
  - (i) upon a defendant...
    - (A) by the sheriff or by a competent adult in the manner prescribed by Rule 402 (a) for the service of original process upon a defendant, or
    - (B) by the plaintiff mailing a copy of the manner prescribed by Rule 403 to the addresses set forth in the affidavit; or
    - (C) if service cannot be made as provided in the subparagraph (A) or (B), the notice shall be served pursuant to special order of court as prescribed by Rule 430, except that if original process was served pursuant to a special order of court under Rule 430 upon the defendant in the judgment, the notice may be served upon that defendant in the manner provided by the order for service of original process without further application to the court.

Because the whereabouts of Defendant, MATTHEW E. JOHNSON, are unknown, a reasonable investigation of their last known address was made in accordance with Pa.R.C.P. 430(a).

Pennsylvania Rule of Civil Procedure, Rule 430 (a) provides as follows:

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

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

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

As indicated by the attached Affidavit of Return of Service, marked hereto as Exhibit "A", the Process Server has been unable to serve the Notice of Sale.

A good faith effort to discover the whereabouts of the Defendant has been made as evidenced by the attached Affidavit of Reasonable Investigation, marked as Exhibit "B".

WHEREFORE, Plaintiff respectfully requests that the allowance of service of the Notice of Sale in accordance with Pa.R.C.P., Rule 430 by certified and regular mail to 999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833 and posting 999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833.

Respectfully submitted,

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  
Michele M. Bradford, Esq., Id. No. 69849  
Judith T. Romano, Esq., Id. No. 58745  
Sheetal R. 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. 86557  
Peter J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375  
Attorneys for Plaintiff

PLAINTIFF  
CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE  
GROUP, INC.

AFFIDAVIT OF SERVICE (FHLMC)

CLEARFIELD COUNTY

PHS # 188640

DEFENDANT  
STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

SERVICE TEAM/ kxc  
COURT NO.: 2008-1939-CD

SERVE MATTHEW E. JOHNSON AT:  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

TYPE OF ACTION  
XX Notice of Sheriff's Sale  
SALE DATE: 12/03/2010

SERVED

Served and made known to MATTHEW E. JOHNSON, Defendant on the \_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_, at \_\_\_\_ o'clock \_\_ M., at \_\_\_\_\_, in the manner described below:

\_\_\_\_ Defendant personally served.

\_\_\_\_ Adult family member with whom Defendant(s) reside(s).

Relationship is \_\_\_\_\_.

\_\_\_\_ Adult in charge of Defendant's residence who refused to give name or relationship.

\_\_\_\_ Manager/Clerk of place of lodging in which Defendant(s) reside(s).

\_\_\_\_ Agent or person in charge of Defendant's office or usual place of business.

\_\_\_\_ an officer of said Defendant's company.

\_\_\_\_ Other: \_\_\_\_\_.

Description: Age \_\_\_\_\_ Height \_\_\_\_\_ Weight \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_ Other \_\_\_\_\_

I, \_\_\_\_\_, a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed  
before me this \_\_\_\_ day  
of \_\_\_\_\_, 20\_\_.

Notary:

By:

NOT SERVED

On the 25<sup>th</sup> day of SEPT, 2010, at 7:00 o'clock P.M., Defendant NOT FOUND because:

\_\_\_\_ Vacant \_\_\_\_ Does Not Exist \_\_\_\_ Moved \_\_\_\_ Does Not Reside (Not Vacant)

☒ No Answer on 9/18/10 at 8:40 AM; 9/20/10 at 5:10 PM

\_\_\_\_ Service Refused

Other:

Sworn to and subscribed  
before me this 28th day  
of September, 2010.

By:

D.M. ELLIS  
DM Ellis

Notary:

Elizabeth A. Ventre

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Elizabeth A. Ventre, Notary Public

Blair Twp., Blair County

My Commission Expires March 31, 2011

Member, Pennsylvania Association of Notaries

ATTORNEY FOR PLAINTIFF

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 R. 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 J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Filiukos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

## AFFIDAVIT OF GOOD FAITH INVESTIGATION

File Number: 188640  
Attorney Firm: **Phelan, Hallinan & Schmieg, LLP**  
Subject: Stephanie M. Johnson & Matthew E. Johnson

Current Address: 999 Friendly Acres Road, Curwensville, PA 16833  
Property Address: 999 Friendly Acres Road, Curwensville, PA 16833  
Mailing Address: 999 Friendly Acres Road, Curwensville, PA 16833

**EXHIBIT B**

**I, being duly sworn according to law, do hereby depose and state as follows, an investigation into the whereabouts of the above-noted individual(s) was conducted and the following has been discovered:**

### I. CREDIT INFORMATION

#### A. SOCIAL SECURITY NUMBER

Our search verified the following information to be true and correct  
Stephanie M. Johnson - xxx-xx-6985  
Matthew E. Johnson - xxx-xx-6080

#### B. EMPLOYMENT SEARCH

Stephanie M. Johnson & Matthew E. Johnson - A review of the credit reporting agencies provided no employment information.

#### C. INQUIRY OF CREDITORS

Our inquiry of creditors indicated that Stephanie M. Johnson & Matthew E. Johnson reside(s) at: 999 Friendly Acres Road, Curwensville, PA 16833.

### II. INQUIRY OF TELEPHONE COMPANY

#### A. DIRECTORY ASSISTANCE SEARCH

Our office searched directory assistance databases, which indicated that Stephanie M. Johnson & Matthew E. Johnson reside(s) at: 999 Friendly Acres Road, Curwensville, PA 16833. On 10-06-10 our office made several telephone calls to the subjects' phone number (814) 236-2876 and received the following information: answering machine.

### III. INQUIRY OF NEIGHBORS

On 10-06-10 our office made a phone call in an attempt to contact Joseph E. Tubbs (814) 236-1199, 1010 Friendly Acres Road, Curwensville, PA 16833: spoke with an unidentified female who confirmed that Stephanie M. Johnson & Matthew E. Johnson reside(s) at 999 Friendly Acres Road, Curwensville, PA 16833.

### IV. ADDRESS INQUIRY

#### A. NATIONAL ADDRESS UPDATE

On 10-06-10 we reviewed the National Address database and found the following information: Stephanie M. Johnson - 999 Friendly Acres Road 999, Curwensville, PA 16833 & Matthew E. Johnson - Penn Area, Penn, PA 15675.

EXHIBIT B

B. ADDITIONAL ACTIVE MAILING ADDRESSES

Per our inquiry of creditors, the following is a possible mailing address: no addresses on file.

V. OTHER INQUIRIES

A. DEATH RECORDS

As of 10-06-10 Vital Records and all public databases have no death record on file for Stephanie M. Johnson & Matthew E. Johnson.

VI. ADDITIONAL INFORMATION OF SUBJECT

A. DATE OF BIRTH

Stephanie M. Johnson - 07-27-1973

Matthew E. Johnson - 09-1973

B. A.K.A.

Stephanie E. Johnson; Stephanie M. Bennett

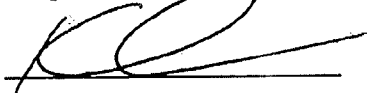
Matthew J. Johnson

**\* Our accessible databases have been checked and cross-referenced for the above named individual(s).**

**\* Please be advised our database information indicates the subject resides at the current address.**

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing states made by me are willfully false, I am subject to punishment.

I hereby verify that the statements made herein are true and correct to the best of my knowledge, information and belief and that this affidavit of investigation is made subject to the penalties of 18 Pa C.S. Sec. 4904 relating to unsworn falsification to authorities.



AFFIANT *Kevin Coyle*

Sworn to and subscribed before me this 12 day of Oct. 2010

The above information is obtained from available public records  
and we are only liable for the cost of the affidavit.

IND



ENID ESTRADA  
NOTARY PUBLIC OF NEW JERSEY  
Commission Expires 12/6/2011

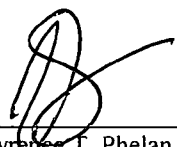
## VERIFICATION

The undersigned attorney hereby states that he is the attorney for the Plaintiff in this action, that he is authorized to take the verification and that the statements made in the foregoing Motion for Service of Notice of Sale pursuant to Special Order of Court are true and correct to the best of his knowledge, information and belief.

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

Date:

10/19/10



---

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 R. 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 J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375  
Attorneys for Plaintiff

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  
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Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

CITIMORTGAGE, INC. S/B/M TO ABN AMRO :  
MORTGAGE GROUP, INC. :

Plaintiff

y.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

## Defendants

CLEARFIELD COUNTY  
COURT OF COMMON PLEAS

CIVIL DIVISION

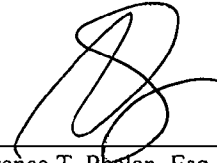
NO. 2008-1939-CD

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Service of Notice of Sale Pursuant to Special Order of Court, Proposed Order, Memorandum of Law, Certification of Service and Verification in the above captioned matter was sent by first class mail, postage prepaid to the following interested parties on the date indicated below.



**STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833**



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 R. Shah-Jani, Esq., Id. No. 81760  
Jenine R. Davey, Esq., Id. No. 87077  
Lauren R. Tabas, Esq., Id. No. 93337  
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Jay B. Jones, Esq., Id. No. 86657  
Peter J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375  
Attorneys for Plaintiff

Date:

10/19/10

CA

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

CITIMORTGAGE, INC. S/B/M TO ABN AMBRO  
MORTGAGE GROUP, INC.  
Plaintiff

vs

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
Defendants

\*  
\*  
\*  
\*  
\*  
\*  
\*

NO. 08-1939-CD

ORDER

NOW, this 25<sup>th</sup> day of October, 2010, the Plaintiff is granted leave to serve the  
NOTICE OF SALE upon the Defendant **MATTHEW E. JOHNSON** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to the following address: 999 Friendly Acres Road, Curwensville, PA 16833;
3. By certified mail, return receipt requested, to the following address: 999 Friendly Acres Road, Curwensville, PA 16833; and
4. By posting the mortgaged premises known in this herein action as 999 Friendly Acres Road, Curwensville, PA 16833 .


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

5  
FILED  
OCT 26 2010

William A. Shaw  
Prothonotary/Clerk of Courts

3cc Atty Srivastava

BY THE COURT,


  
FREDRIC J. AMMERMAN  
President Judge

4 FILED NO  
MTH 3781 CC  
OCT 29 2010  
William A Shaw  
Prothonotary/Clerk of Courts

I hereby certify that a true and correct copy of the Notice of Sheriff Sale in the above captioned matter was sent by regular mail and certified mail, return receipt requested, to **STEPHANIE M. JOHNSON** on **10/5/2010** at **999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833** in accordance with the Order of Court dated **3/2/2009**. The property was posted on **10/12/2010**. Publication was advertised in **THE PROGRESS** on **10/8/2010** & in **CLEARFIELD LEGAL JOURNAL** on **10/8/2010**.

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

FHELAN 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  
Andrew L. Spivack, Esq., Id. No. 84439  
Peter J. Mulcahy, Esquire  
Jaime McGuinness, Esquire  
Chrisovalante P. Fliakos, Esquire  
Joshua I. Goldman, Esquire  
Courtenay R. Dunn, Esq., Id No. 206779  
✓ Andrew C. Bramblett, Esq., Id No. 208375  
Attorneys for Plaintiff

Dated: October 27, 2010

NOTICE OF  
SHERIFF'S SALE  
IN THE COURT  
OF COMMON PLEAS  
OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
NO. 2008-1939-CD  
CITIMORTGAGE, INC.,  
S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.  
vs.  
STEPHANIE M. JOHNSON &  
MATTHEW E. JOHNSON  
NOTICE TO:  
STEPHANIE M. JOHNSON  
NOTICE OF  
SHERIFF'S SALE  
OF REAL PROPERTY  
Being Premises:  
999 FRIENDLY ACRES ROAD,  
CURWENSVILLE, PA 16833  
Being in Township of Penn,  
County of CLEARFIELD Commcn-  
wealth of Pennsylvania  
TAX  
PARCEL#125-F10-000-00101  
Improvements consist of residen-  
tial property.  
Sold as the property of  
STEPHANIE M. JOHNSON  
& MATTHEW E. JOHNSON  
Your house (real estate) at 999  
FRIENDLY ACRES ROAD, CUR-  
WENSVILLE, PA 16833 is sched-  
uled to be sold at the Sheriff's Sale  
on DECEMBER 3, 2010 at 10:00  
A.M. at the CLEARFIELD County  
Courthouse to enforce the Court  
Judgment of \$61,266.10 ob-  
tained by, CITIMORTGAGE, INC.  
S/B/M TO ABN AMRO MORT-  
GAGE GROUP, INC. (the mortga-  
gee), against the above premises.  
PHELAN HALLINAN  
& SCHMIEG, LLP  
Attorney for Plaintiff

10:8-1d-b

## PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :  
COUNTY OF CLEARFIELD : SS:

On this 14th day of October, A.D. 20 10,  
before me, the subscriber, a Notary Public in and for said County and  
State, personally appeared Margaret E. Krebs, who being duly sworn  
according to law, deposes and says that she is the President of The  
Progressive Publishing Company, Inc., and Associate Publisher of The  
Progress, a daily newspaper published at Clearfield, in the County of  
Clearfield and State of Pennsylvania, and established April 5, 1913, and  
that the annexed is a true copy of a notice or advertisement published in  
said publication in

the regular issues of October 8, 2010

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

*Margaret E. Krebs*

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

*Cheryl J. Robison*  
Notary Public Clearfield, Pa.

### COMMONWEALTH OF PENNSYLVANIA

Notarial Seal

Cheryl J. Robison, Notary Public  
Clearfield Boro, Clearfield County  
My Commission Expires Oct. 31, 2011

Member, Pennsylvania Association of Notaries

NOTICE OF SHERIFF'S SALE  
IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
CIVIL ACTION - LAW  
NO. 2008-1939-CD

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

COUNTY OF CLEARFIELD :

CITIMORTGAGE, INC., S/B/M TO ABN  
AMRO MORTGAGE GROUP, INC. vs.  
STEPHANIE M. JOHNSON & MATTHEW  
E. JOHNSON NOTICE TO: STEPHANIE  
M. JOHNSON

NOTICE OF SHERIFF'S SALE OF REAL  
PROPERTY"

Being Premises: 999 FRIENDLY ACRES  
ROAD, CURWENSVILLE, PA 16833

Being in Township of Penn, County of  
CLEARFIELD Commonwealth of Pennsyl-  
vania TAX PARCEL#125-FI 0-000-00101  
Improvements consist of residential prop-  
erty.

Sold as the property of STEPHANIE M.  
JOHNSON & MATTHEW E. JOHNSON  
Your house (real estate) at 999 FRIENDLY  
ACRES ROAD, CURWENSVILLE, PA


16833 is scheduled to be sold at the Sher-  
iff's Sale on DECEMBER 3, 2010 at 10:00

AM. at the CLEARFIELD County Court-  
house to enforce the Court Judgment of

\$61,266.10 obtained by, CITIMORTGAGE,  
INC. S/B/M TO ABN AMRO MORTGAGE  
GROUP, INC. (the mortgagee), against the  
above premises.

PHELAN HALLINAN & SCHMIEG, LLP Attor-  
ney for Plaintiff

On this 8th day of October AD 2010, before me, the subscrib-  
in and for said County and State, personally appeared Gary A. Knaresboro, Editor  
Clearfield County Legal Journal of the Courts of Clearfield County,  
is a true copy of the notice or advertisement published in said publication  
issues of Week of October 8, 2010, Vol. 22, No.41. And that all of the  
statement as to the time, place, and character of the publication are

  
Gary A. Knaresboro, Esquire  
Editor

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

  
Notary Public  
My Commission Expires

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Amanda Mae Gardner, Notary Public  
Clearfield County, Clearfield County  
My Commission Expires May 28, 2013  
Member, Pennsylvania Association of Notaries

Brendan Booth  
Full Spectrum Services, Inc.  
400 Fellowship Road  
Suite 220  
Mount Laurel, NJ 08054

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

CITIMORTGAGE, INC. S/B/M to ABN AMRO  
MORTGAGE GROUP, INC.,  
Plaintiff

vs.

STEPHANIE M. JOHNSON,  
MATTHEW E. JOHNSON,  
Defendants

\*  
\*  
\*  
\*  
\*  
\*

NO. 08-1939-CD

ORDER

NOW, this 2<sup>nd</sup> day of March, 2009, the Plaintiff is granted leave to serve the  
Complaint upon the Defendant **STEPHANIE M. JOHNSON** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield  
County Legal Journal;
2. By first class mail to 999 Friendly Acres Road, Curwensville, PA  
16833;
3. By certified mail, return receipt requested to 999 Friendly Acres  
Road, Curwensville, PA 16833; and
4. By posting the mortgaged premises known in this herein action as to  
999 Friendly Acres Road, Curwensville, PA 16833.

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

BY THE COURT,

/S/ Fredric J Ammerman

FREDRIC J. AMMERMAN  
President Judge

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

MAR 03 2009

Attest.



*William A. Brown*  
Prothonotary/  
Clerk of Courts

**AFFIDAVIT OF SERVICE (FHLMC)**

**PLAINTIFF**  
CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE  
GROUP, INC.

**CLEARFIELD COUNTY**

**PHS # 188640**

**DEFENDANT**  
STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

**SERVICE TEAM/ kxc**  
**COURT NO.: 2008-1939-CD**

**SERVE STEPHANIE M. JOHNSON AT:**  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

**TYPE OF ACTION**  
**XX Notice of Sheriff's Sale**  
**SALE DATE: 12/03/2010**

**\*\*PLEASE POST PROPERTY PER COURT ORDER\*\***

**SERVED**

Served and made known to STEPHANIE M. JOHNSON, Defendant on the 12 day of Oct, 2010 at 11:24 o'clock A. M., at 999 Friendly Acres Road, Curwensville pa, in the manner described below:

- ☐ Defendant personally served.  
☐ Adult family member with whom Defendant(s) reside(s).  
Relationship is \_\_\_\_\_.  
☐ Adult in charge of Defendant's residence who refused to give name or relationship.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business.  
☐ \_\_\_\_\_ an officer of said Defendant's company.

☒ Other: passed

Description: Age \_\_\_\_\_ Height \_\_\_\_\_ Weight \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_ Other \_\_\_\_\_

I, \_\_\_\_\_, a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed  
before me this 13th day  
of October, 2010

Notary: Elizabeth A. Ventre By: Elwood Manion  
**NOT SERVED**

On the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_ M., Defendant NOT FOUND because:

- ☐ Vacant ☐ Does Not Exist ☐ Moved ☐ Does Not Reside (Not Vacant)  
☐ No Answer on \_\_\_\_\_ at \_\_\_\_\_; \_\_\_\_\_ at \_\_\_\_\_  
☐ Service Refused

Other:

Sworn to and subscribed  
before me this \_\_\_\_\_ day  
of \_\_\_\_\_, 20\_\_\_\_. By:

**Notary:**

**ATTORNEY FOR PLAINTIFF**

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 R. 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 J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375  
One Penn Center at Suburban Station  
1617 John F. Kennedy Blvd., Suite 1400  
Philadelphia, PA 19103-1814  
(215) 563-7000

**COMMONWEALTH OF PENNSYLVANIA**  
**Notarial Seal**  
**Elizabeth A. Ventre, Notary Public**  
**Blair Twp., Blair County**  
**My Commission Expires March 31, 2011**

**Member, Pennsylvania Association of Notaries**



Name and Address of Sender

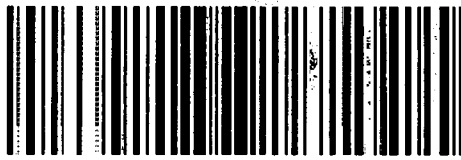
PHELAN HALLINAN & SCHMIEG  
One Penn Center at Suburban, Suite 1400  
Philadelphia, PA 19103

Line	Article Number	Name of Addressee, Street, and Post Office Address	Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)
1	****	STEPHANIE M. JOHNSON 999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833-0000		
2	****			
3	****			
4	****			
5				
6	****			
7	****			
8	****			
9	****			
10	****			
11	****			
12	****			
13	****			
14				
15				
Total Number of Pieces Listed by Sender		RE: STEPHANIE M. JOHNSON PHS#188640		
Total Number of Pieces Received at Post Office				
Postmaster, Per (Name of Receiving Employee)				



UNITED STATES POSTAGE  
Eagle logo  
PITNEY BOWES  
02 1M \$ 01.26°  
0004277256 OCT 05 2010  
MAILED FROM ZIP CODE 19103

SPL



7178 2417 3099 0069 1456

3 / SPL  
STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-0000

--fold here (regular)

-- fold here (6x9)

--fold here (regular)

[Home](#) | [Help](#) | [Sign In](#)[Track & Confirm](#) [FAQs](#)

## Track & Confirm

### Search Results

Label/Receipt Number: **7178 2417 6C99 0069 1456**  
Class: **First-Class Mail®**  
Service(s): **Return Receipt Electronic**  
Status: **Delivered**

#### Track & Confirm

Enter Label/Receipt Number.

Your item was delivered at 4:40 pm on October 08, 2010 in  
CURWENSVILLE, PA 16833.

[Go >](#)

#### Detailed Results:

- Delivered, October 08, 2010, 4:40 pm, CURWENSVILLE, PA 16833
- Notice Left, October 07, 2010, 10:23 am, CURWENSVILLE, PA 16833
- Arrival at Unit, October 07, 2010, 7:29 am, CURWENSVILLE, PA 16833
- Electronic Shipping Info Received, October 05, 2010

#### Notification Options

##### Track & Confirm by email

Get current event information or updates for your item sent to you or others by email.

[Go >](#)

##### Return Receipt (Electronic)

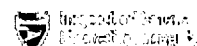
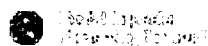
Verify who signed for your item by email.

[Go >](#)[Site Map](#)[Customer Service](#)[Forms](#)[Gov't Services](#)[Careers](#)[Privacy Policy](#)[Terms of Use](#)[Business Customer Gateway](#)

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No FEAR Act EEO Data

FOIA



IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.  
Plaintiff,

v.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
Defendant(s)

: CLEARFIELD COUNTY  
:  
: COURT OF COMMON PLEAS  
:  
: CIVIL DIVISION  
:  
: No.: 2008-1939-CD  
:

AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129.1

COMMONWEALTH OF PENNSYLVANIA )  
PHILADELPHIA COUNTY ) SS:

As required by Pa. R.C.P. 3129.1(a) Notice of Sale has been given to Lienholders and any known interested party in the manner required by Pa. R.C.P. 3129.2(c) on each of the persons or parties named, at that address, set forth on the Affidavit and as amended if applicable. A copy of the Certificate of Mailing (Form 3817) and/or Certified Mail Return Receipt stamped by the U.S. Postal Service is attached hereto Exhibit "A".

☐ 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 R. 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 J. Mulcahy, Esq., Id. No. 61791  
☒ Andrew L. Spivack, Esq., Id. No. 84439  
☐ Jaime McGuinness, Esq., Id. No. 90134  
☐ Chrisovalante P. Fliakos, Esq., Id. No. 94620  
☐ Joshua I. Goldman, Esq., Id. No. 205047  
☐ Courtenay R. Dunn, Esq., Id. No. 206779  
☐ Andrew C. Bramblett, Esq., Id. No. 208375  
Attorney for Plaintiff

Date: 11/3/10

**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.

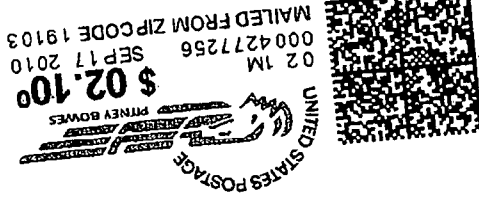
Name and  
Address  
Of Sender



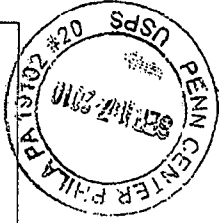
Phelan Hallinan & Schmieg, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103

JOT/PAS - 12/03/10 SALE

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee
1	****	TENANT/OCCUPANT 999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833-7707		
2	****	DOMESTIC RELATIONS CLEARFIELD COUNTY CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830		
3	****	Commonwealth of Pennsylvania Department of Welfare P.O. Box 2675 Harrisburg, PA 17105		
4	****	Internal Revenue Service Advisory 1000 Liberty Avenue Room 704 Pittsburgh, PA 15222		
5	****	U.S. Department of Justice Michael C. Colville, Esquire, United States Attorney Western District of PA 633 U.S. Post Office & Courthouse Pittsburgh, PA 15219		
6				
7				
8				
9				
10				
11				
12				
13				
14				
15		RE: STEPHANIE M. JOHNSON (CLEARFIELD) TELEPHONE RECORDS		



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 \$30,000 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, 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 R. 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 J. Mulcahy, Esq., Id. No. 61791  
Andrew L. Spivack, Esq., Id. No. 84439  
Jaime McGuinness, Esq., Id. No. 90134  
Chrisovalante P. Fliakos, Esq., Id. No. 94620  
Joshua I. Goldman, Esq., Id. No. 205047  
Courtenay R. Dunn, Esq., Id. No. 206779  
Andrew C. Bramblett, Esq., Id. No. 208375  
Allison Wells, Esq., Id. No. 309519  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
215-563-7000

FILED No CC-  
m 10:32 am  
NOV 30 2010

William A. Shaw  
Prothonotary/Clerk of Courts

CITIMORTGAGE, INC. S/B/M TO ABN AMRO  
MORTGAGE GROUP, INC.

Plaintiff,

v.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

Defendants

CLEARFIELD COUNTY  
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 08-1939-CD

**VERIFICATION OF SERVICE OF NOTICE OF SHERIFF'S SALE  
PURSUANT TO P.R.C.P., 404(2)/403**

I hereby certify that a true and correct copy of the Notice of Sheriff Sale in the above captioned matter was sent by regular mail and certified mail, return receipt requested, to **MATTHEW E. JOHNSON** on **11/1/2010** in accordance with the Order of Court dated **10/25/2010**. The property was posted on **11/3/2010**. Publication was advertised in **THE PROGRESS** on **11/5/2010** & in **LEGAL JOURNAL** on **11/12/2010**.

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

PHELAN HALLINAN & SCHMIEG, LLP

By: 

Lawrence T. Phelan, Esquire  
Francis S. Hallinan, Esquire  
Daniel C. 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  
Andrew L. Spivack, Esq.,  
Peter J. Mulcahy, Esquire  
Jaime McGuinness, Esquire  
Chrisovalante P. Fliakos, Esquire  
Joshua I. Goldman, Esquire  
Courtenay R. Dunn, Esq.,  
Andrew C. Bramblett, Esq.,  
Allison Wells, Esq.  
Attorneys for Plaintiff

Dated: November 29, 2010

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

CITIMORTGAGE, INC. S/B/M TO ABN AMBRO  
MORTGAGE GROUP, INC.  
Plaintiff

vs

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON  
Defendants

\*  
\*  
\*  
\*  
\*  
\*  
\*

NO. 08-1939-CD

ORDER

NOW, this 25<sup>th</sup> day of October, 2010, the Plaintiff is granted leave to serve the  
NOTICE OF SALE upon the Defendant **MATTHEW E. JOHNSON** by:

1. Publication one time in The Progress (Clearfield) and the Clearfield County Legal Journal;
2. By first class mail to the following address: 999 Friendly Acres Road, Curwensville, PA 16833;
3. By certified mail, return receipt requested, to the following address: 999 Friendly Acres Road, Curwensville, PA 16833; and
4. By posting the mortgaged premises known in this herein action as 999 Friendly Acres Road, Curwensville, PA 16833 .

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

BY THE COURT,

/S/ Fredric J Ammerman

FREDRIC J. AMMERMAN  
President Judge

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

OCT 26 2010

Attest.

William A. Hines  
Prothonotary/  
Clerk of Courts



NOTICE OF  
SHERIFF'S SALE  
IN THE COURT  
OF COMMON PLEAS  
OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
NO. 2008-1939-CD

CITIMORTGAGE, INC.,

S/B/M TO ABN

AMRO MORTGAGE  
GROUP, INC.

vs.

STEPHANIE M. JOHNSON  
& MATTHEW E. JOHNSON

NOTICE TO:

MATTHEW E. JOHNSON

NOTICE OF SHERIFF'S

SALE OF

REAL PROPERTY

Being Premises:

999 FRIENDLY ACRES ROAD

CURWENSVILLE, PA 16833

Being in the

Township of Penn,

County of CLEARFIELD

Commonwealth of Pennsylvania

Tax Parcel

No. 125-F10-000-00101

Improvements consist of residen-  
tial property.

Sold as the property of

STEPHANIE M. JOHNSON

& MATTHEW E. JOHNSON

Your house (real estate) at 999

FRIENDLY ACRES ROAD, CUR-

WENSVILLE, PA 16833 is sched-

uled to be sold at the Sheriff's Sale

on DECEMBER 3, 2010 AT 10:00

A.M. at the CLEARFIELD County

Courthouse to enforce the Court

Judgment of \$61,266.10 ob-

tained by, CITIMORTGAGE, INC.,

S/B/M TO ABN AMRO MORT-

GAGE GROUP, INC. (the mortga-

gee), against the above premises.

PHILAN HALLINAN

& SCHMIEG, LLP

Attorney for Plaintiff

11:5-1d-b

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA

COUNTY OF CLEARFIELD

SS:

On this 12th day of November, A.D. 20 10,  
before me, the subscriber, a Notary Public in and for said County and  
State, personally appeared Margaret E. Krebs, who being duly sworn  
according to law, deposes and says that she is the President of The  
Progressive Publishing Company, Inc., and Associate Publisher of The  
Progress, a daily newspaper published at Clearfield, in the County of  
Clearfield and State of Pennsylvania, and established April 5, 1913, and  
that the annexed is a true copy of a notice or advertisement published in  
said publication in

the regular issues of November 5, 2010  
And that the affiant is not interested in the subject matter of the notice or  
advertising, and that all of the allegations of this statement as to the time,  
place, and character of publication are true.

*Margaret E. Krebs*  
Sworn and subscribed to before me the day and year aforesaid.  
*Cheryl J. Robison*  
Notary Public Clearfield, Pa.

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

*[Signature]*  
Gary A. Knaresboro, Esquire  
Editor

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

*[Signature]*  
Notary Public  
My Commission Expires

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Amy Mae Gardner, Notary Public  
City of DuBois, Clearfield County  
My Commission Expires May 28, 2013  
Member, Pennsylvania Association of Notaries

Brendan Booth  
Full Spectrum Service, Inc.  
400 Fellowship Road, Suite 220  
Mount Laurel, NJ 08054

**AFFIDAVIT OF SERVICE (FHLMC)**

**PLAINTIFF**  
**CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE**  
**GROUP, INC.**

**CLEARFIELD COUNTY**

**PHS # 188640**

**DEFENDANT**  
**STEPHANIE M. JOHNSON**  
**MATTHEW E. JOHNSON**

**SERVICE TEAM/ kxc**  
**COURT NO.: 2008-1939-CD**

**SERVE MATTHEW E. JOHNSON AT:**  
**999 FRIENDLY ACRES ROAD**  
**CURWENSVILLE, PA 16833-7707**  
**\*\*PLEASE RUSH\*\*PLEASE POST PROPERTY\*\***

**TYPE OF ACTION**  
**XX Notice of Sheriff's Sale**  
**SALE DATE: 12/03/2010**

**SERVED**

Served and made known to MATTHEW E. JOHNSON, Defendant on the 3<sup>RD</sup> day of Nov, 20 10, at 7:40, o'clock P. M., at 999 FRIENDLY ACRES Rd, in the manner described below:

- ☐ Defendant personally served.  
☐ Adult family member with whom Defendant(s) reside(s).  
     Relationship is \_\_\_\_\_.  
☐ Adult in charge of Defendant's residence who refused to give name or relationship.  
☐ Manager/Clerk of place of lodging in which Defendant(s) reside(s).  
☐ Agent or person in charge of Defendant's office or usual place of business.  
     \_\_\_\_\_ an officer of said Defendant's company.

☒ Other: POSTING of Document.

Description: Age \_\_\_\_\_ Height \_\_\_\_\_ Weight \_\_\_\_\_ Race \_\_\_\_\_ Sex \_\_\_\_\_ Other \_\_\_\_\_

I, DM. ELLIS, a competent adult, being duly sworn according to law, depose and state that I personally handed a true and correct copy of the Notice of Sheriff's Sale in the manner as set forth herein, issued in the captioned case on the date and at the address indicated above.

Sworn to and subscribed  
 before me this 8th day  
 of November, 2010.

Notary: Elizabeth A. Ventre By: DM Ellis

**NOT SERVED**

On the \_\_\_\_\_ day of \_\_\_\_\_, 2010, at \_\_\_\_\_ o'clock \_\_\_\_\_ M., Defendant NOT FOUND because:  
☐ Vacant ☐ Does Not Exist ☐ Moved ☐ Does Not Reside (Not Vacant)  
☐ No Answer on \_\_\_\_\_ at \_\_\_\_\_; \_\_\_\_\_ at \_\_\_\_\_  
☐ Service Refused

Other:

Sworn to and subscribed  
 before me this \_\_\_\_\_ day  
 of \_\_\_\_\_, 20\_\_\_\_. By:

Notary:

**ATTORNEY FOR PLAINTIFF**

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 R. 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 J. Mulcahy, Esq., Id. No. 61791  
 Andrew L. Spivack, Esq., Id. No. 84439  
 Jaime McGuinness, Esq., Id. No. 90134  
 Chrisovalante P. Flakos, Esq., Id. No. 94620  
 Joshua I. Goldman, Esq., Id. No. 205047  
 Courtenay R. Dunn, Esq., Id. No. 206779  
 Andrew C. Bramblett, Esq., Id. No. 208375  
 One Penn Center at Suburban Station  
 1617 John F. Kennedy Blvd., Suite 1400  
 Philadelphia, PA 19103-1814  
 (215) 563-7000

COMMONWEALTH OF PENNSYLVANIA


Notarial Seal

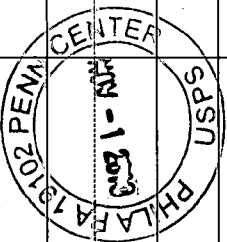
Elizabeth A. Ventre, Notary Public  
 Blair Twp., Blair County  
 My Commission Expires March 31, 2011

Member, Pennsylvania Association of Notaries

Name and Address of Sender

PHILAN HALLINAN & SCHMIEG  
One Penn Center at Suburban, Suite 1400  
Philadelphia, PA 19103

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee
1	****	MATTHEW E. JOHNSON 999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833-7707	 \$ 01.26 <sup>0</sup> 02 1M 0004277256 NOV 01 2010 MAILED FROM ZIP CODE 19103	
2	****			
3	****			
4	****			
5				
6	****			
7	****			
8	****			
9	****			
10	****			
11	****			
12	****			
13	****			
14				
15				
Total Number of Pieces Listed by Sender			Total Number of Pieces Received at Post Office	
RE: MATTHEW E. JOHNSON PHS#188640			Postmaster, Per (Name of Receiving Employee)	



SPL

[Home](#) | [Help](#) | [Sign In](#)[Track & Confirm](#)[FAQs](#)

## Track & Confirm

### Search Results

Label/Receipt Number: **7178 2417 6099 0071 0300**Expected Delivery Date: **November 4, 2010**Class: **First-Class Mail®**Service(s): **Return Receipt Electronic**Status: **Delivered**

Your item was delivered at 8:26 am on November 08, 2010 in  
CURWENSVILLE, PA 16833.

#### Detailed Results:

- **Delivered, November 08, 2010, 8:26 am, CURWENSVILLE, PA 16833**
- **Notice Left, November 03, 2010, 9:01 am, CURWENSVILLE, PA 16833**
- **Acceptance, November 01, 2010, 5:08 pm, PHILADELPHIA, PA 19102**
- **Electronic Shipping Info Received, November 01, 2010**

### Notification Options

#### Track & Confirm by email

Get current event information or updates for your item sent to you or others by email. [Go >](#)

#### Return Receipt (Electronic)

Verify who signed for your item by email. [Go >](#)

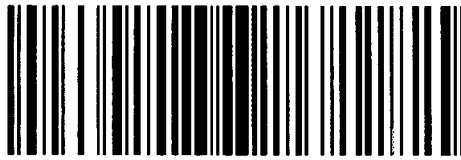
### Track & Confirm

Enter Label/Receipt Number.

[Go >](#)[Site Map](#)[Customer Service](#)[Forms](#)[Gov't Services](#)[Careers](#)[Privacy Policy](#)[Terms of Use](#)[Business Customer Gateway](#)

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[No FEAR Act EEO Data](#)[FOIA](#)[Equal Housing Opportunity](#)[Intelligent Mail](#)



7178 2417 6099 0071 0300

3 / SPL  
MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-0000

--fold here (regular)

-- fold here (6x9)

--fold here (regular)

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 21230  
NO: 08-1939-CD

PLAINTIFF: CITIMORTGAGE, INC S/B/M TO ABN AMRO MORTGAGE GROUP, INC.  
vs.  
DEFENDANT: STEPHANIE M. JOHNSON AND MATTHEW E. JOHNSON

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 8/16/2010

LEVY TAKEN 9/23/2010 @ 11:30 AM

POSTED 9/23/2010 @ 11:30 AM

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 8/3/2011

DATE DEED FILED NOT SOLD

FILED  
OCT 28 2011  
AUG 03 2011  
William A. Shaw  
Prothonotary/Clerk of Courts

DETAILS

10/11/2010 @ 2:05 PM SERVED MATTHEW E. JOHNSON

SERVED MATTHEW E. JOHNSON, DEFENDANT, AT HIS RESIDENCE 999 FRIENDLY ACRES ROAD, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO STEPHANIE M. JOHNSON, WIFE/CO-DEFENDANT

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.

10/18/2010 @ SERVED STEPHANIE M. JOHNSON

SERVED STEPHANIE M. JOHNSON, DEFENDANT, BY REG & CERT MAIL PER COURT ORDER TO 999 FRIENDLY ACRES ROAD, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA CERT #70083230000335909000. CERT RETD UNCLAIMED 10/18/10

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF THE LEVY.

@ SERVED

NOW, NOVEMBER 23, 2010 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED FOR DECEMBER 3, 2010 TO FEBRUARY 4, 2011, DUE TO SERVICE OF NOS.

@ SERVED

NOW, FEBRUARY 3, 2011 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED FOR FEBRUARY 4, 2011 TO APRIL 1, 2011, DUE TO BANKRUPTCY FILING.

@ SERVED

NOW, MARCH 30, 2011 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO STAY THE SHERIFF SALE SCHEDULED FOR APRIL 1, 2011 DUE TO BANKRUPTCY FILING.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 21230  
NO: 08-1939-CD

PLAINTIFF: CITIMORTGAGE, INC S/B/M TO ABN AMRO MORTGAGE GROUP, INC.

vs.

DEFENDANT: STEPHANIE M. JOHNSON AND MATTHEW E. JOHNSON

Execution REAL ESTATE


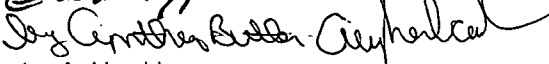
SHERIFF RETURN

---

SHERIFF HAWKINS \$243.24

SURCHARGE \$40.00 PAID BY ATTORNEY

So Answers,

  
  
Chester A. Hawkins  
Sheriff

**WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)**

**Pa.R.C.P. 3180-3183 and Rule 3257**

CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE  
GROUP, INC.

COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 2008-1939-CD

CLEARFIELD COUNTY

vs.

STEPHANIE M. JOHNSON

MATTHEW E. JOHNSON

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

PREMISES: 999 FRIENDLY ACRES ROAD, CURWENSVILLE, PA 16833-7707

(See Legal Description attached)

Amount Due

Interest from 06/27/2009 to Sale

Per diem \$10.07

Add'l Costs

Writ Total

Prothonotary costs

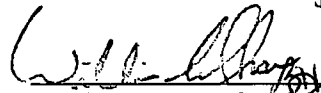
\$61,266.10

176.00

\$ \_\_\_\_\_

\$6,178.82

\$ \_\_\_\_\_



OFFICE OF THE PROTHONOTARY OF CLEARFIELD  
COUNTY, PENNSYLVANIA

Dated 8/16/10  
(SEAL)

PHS # 188640

Received this writ this 16<sup>th</sup> day  
of August A.D. 2010  
At 3:00 A.M./P.M.

Charles A. Haveris  
Sheriff Dry Creek, Butler, Clearfield



No. 2008-1939-CD

IN THE COURT OF COMMON PLEAS OF  
CLERAFIELD COUNTY, PENNSYLVANIA

CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC.

vs.

STEPHANIE M. JOHNSON  
MATTHEW E. JOHNSON

WRIT OF EXECUTION  
(Mortgage Foreclosure)

	<u>Costs</u>
Real Debt	\$61,266.10
Int. from	
To Date of Sale (\$10.07 per diem)	
Costs	
Prothy Pd.	<u>176.00</u>
Sheriff	

Filed



Attorney for Plaintiff

**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 R. 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 J. Mulcahy, Esq., Id. No. 61791
- ☐ Andrew L. Spivack, Esq., Id. No. 84439
- ☐ Jaime McGuinness, Esq., Id. No. 90134
- ☐ Chrisovalante P. Fliakos, Esq., Id. No. 94620
- ☐ Joshua I. Goldman, Esq., Id. No. 205047
- ☐ Courtenay R. Dunn, Esq., Id. No. 206779
- ☒ Andrew C. Bramblett, Esq., Id. No. 208375

Address where papers may be served:  
STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

### LEGAL DESCRIPTION

ALL that certain lot or piece of ground situate in the Township of Penn, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post on line of public road, thence South seventy and one half ( $70\frac{1}{2}$ ) degrees West three hundred forty-four (344) feet to post on line of same public road; thence North five and one half ( $5\frac{1}{2}$ ) degrees East two hundred seventy-nine (279) feet to post on line now or formerly of G. L. Wood; thence South sixty-two and one fourth ( $62\frac{1}{4}$ ) degrees East three hundred forty-four (344) feet to place of beginning. Containing one (1) acre, more or less.

TITLE TO SAID PREMISES IS VESTED IN Matthew E. Johnson and Stephanie M. Johnson, h/w, by Deed from Leo P. Krise, Sr. and Florence L. Krise, h/w and Christine A. Spencer and Raymond L. Spencer, her husband, dated 10/29/1998, recorded 10/30/1998 in Book 1981, Page 171.

Premises being: 999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

Tax Parcel No. 125-F10-000-00101

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME MATTHEW E. JOHNSON

NO. 08-1939-CD

NOW, August 03, 2011, 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 April 01, 2011, I exposed the within described real estate of Stephanie M. Johnson And Matthew E. Johnson to public venue or outcry at which time and place I sold the same to he/she being the highest bidder, for the sum of and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	15.00
SERVICE	15.00
MILEAGE	6.00
LEVY	15.00
MILEAGE	6.00
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	14.24
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	
ADD'L POSTING	
ADD'L MILEAGE	12.00
ADD'L LEVY	
BID/SETTLEMENT AMOUNT	
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	40.00
MISCELLANEOUS	
<b>TOTAL SHERIFF COSTS</b>	<b>\$243.24</b>

**DEED COSTS:**

ACKNOWLEDGEMENT	
REGISTER & RECORDER	
TRANSFER TAX 2%	0.00
<b>TOTAL DEED COSTS</b>	<b>\$0.00</b>

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	61,266.10
INTEREST @ 10.0700	2,799.46
FROM 06/27/2010 TO 04/01/2011	
ATTORNEY FEES	
PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	6,178.82
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	40.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	
<b>TOTAL DEBT AND INTEREST</b>	<b>\$70,284.38</b>

**COSTS:**

ADVERTISING	258.25
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
ASSESSMENT FEE	
LIEN SEARCH	200.00
ACKNOWLEDGEMENT	
DEED COSTS	0.00
SHERIFF COSTS	243.24
LEGAL JOURNAL COSTS	216.00
PROTHONOTARY	176.00
MORTGAGE SEARCH	80.00
MUNICIPAL LIEN	
<b>TOTAL COSTS</b>	<b>\$1,173.49</b>

DISTRIBUTION WILL BE MADE IN ACCORDANCE WITH THE ABOVE SCHEDULE UNLESS EXCEPTIONS ARE FILED WITH THIS OFFICE **WITHIN TEN (10) DAYS FROM THIS DATE.**

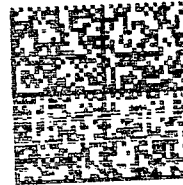
CHESTER A. HAWKINS, Sheriff

CHESTER A. HAWKINS  
SHERIFF

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



7008 3230 0003 3590 9000



Hasler

016H16505405

\$05.71

09/29/2010

Mailed From 16830  
US POSTAGE

UPK

REC.  
10-18-10

STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833

SC  
OR

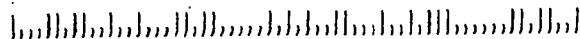
9.30

NIXIE 165 DE 1 00 10/15/10

RETURN TO SENDER  
UNCLAIMED  
UNABLE TO FORWARD

BC: 16830247201 \*0596-04530-15-27

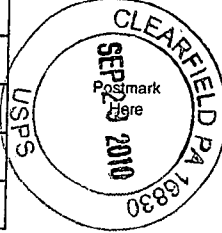
1683002472



7008 3230 0003 3590 9000

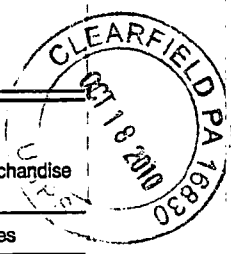
U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only, No Insurance Coverage Provided)	
For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
OFFICIAL USE	
Postage	\$ 61
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.71
Sent To	
Street, Apt. No., or PO Box No.	STEPHANIE M. JOHNSON 999 FRIENDLY ACRES ROAD
City, State, ZIP+4	CURWENSVILLE, PA 16833

PS Form 3800, August 2006 See Reverse for Instructions





SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"><li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li><li>■ Print your name and address on the reverse so that we can return the card to you.</li><li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li></ul> 1. Article Addressed to:  STEPHANIE M. JOHNSON 999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833		A. Signature <b>X</b> <div><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</div>	
		B. Received by ( <i>Printed Name</i> )	C. Date of Delivery
		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No	
		3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.	
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes			



2. Article Number (Transfer from service label)	7008 3230 0003 3590 9000
--	--------------------------

**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

November 23, 2010

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

Attn: Real Estate Department

Fax Number: 814-765-5915

Re: CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC. v.  
STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833-7707  
No.: 2008-1939-CD

Dear Sir/Madam:

Please Postpone the Sheriff Sale of the above referenced property, which is scheduled for December 3, 2010 due to the following: Service of NOS.

The Property is to be relisted for the February 4, 2011 Sheriff Sale.

Thank you for your cooperation in this matter.

Very Truly Yours,  
David Tran for  
Phelan Hallinan & Schmieg, LLP

**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

February 3, 2011

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

Attn: Real Estate Department

Fax Number: 814-765-5915

Re: CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC. v.  
STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833-7707  
No.: 2008-1939-CD

Dear Sir/Madam:

Please Postpone the Sheriff Sale of the above referenced property, which is scheduled for February 4, 2011 due to the following: Bankruptcy.

The Property is to be relisted for the April 1, 2011 Sheriff Sale.

Thank you for your cooperation in this matter.

Very Truly Yours,  
Matthew Balitzky for  
Phelan Hallinan & Schmieg, LLP

**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

March 29, 2011

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

Attn: Real Estate Department

Fax Number: 814-765-5915

Re: CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC. v.  
STEPHANIE M. JOINSON and MATTHEW E. JOINSON  
999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833-7707  
No.: 2008-1939-CD

Dear Sir/Madam:

Please STAY the Sheriff's Sale of the above referenced property, which is scheduled for April 1, 2011 due to the following: Bankruptcy.

Defendants filed a Chapter 13, Bankruptcy Number 11-70103, on February 3, 2011.

You are hereby directed to immediate discontinue the advertising of the sale and processing or posting of the Notice of Sale.

Please return the original Writ of Execution to the Prothonotary as soon as possible. **In addition, please forward a copy of the cost sheet pertaining to this sale to our office via facsimile to 215-567-0072 or regular mail at your earliest convenience.**

Thank you for your cooperation in this matter.

Very Truly Yours,  
ELIZABETH HALLINAN for  
Phelan Hallinan & Schmieg, L.L.P.



LI

FILED

ICC Atty  
Cramer

S OCT 25 2016  
0111:15/11

BRIAN K. SPENCER  
PROTHONOTARY & CLERK OF COURTS

David Cramer, Esq., Id. No.307873  
PHELAN HALLINAN DIAMOND & JONES,  
LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
david.cramer@phelanhallinan.com  
Identification No: 307873  
215-563-7000

Attorney for Plaintiff

CITIMORTGAGE, INC. S/B/M TO ABN  
AMRO MORTGAGE GROUP, INC.  
Plaintiff

: Court of Common Pleas  
:  
: Civil Division  
:  
: CLEARFIELD County  
:  
: No. 2008-1939-CD  
:

v.

MATTHEW E. JOHNSON  
STEPHANIE M. JOHNSON  
Defendants

PRAECIPE TO MARK JUDGMENT TO USE PLAINTIFF

TO THE PROTHONOTARY:

Please mark the judgment in the above-captioned matter to the use of DITECH FINANCIAL  
LLC F/K/A GREEN TREE SERVICING LLC, located 3000 BAYPORT DRIVE SUITE 880  
TAMPA, FL 33607.

Date: 10/24/16

PHELAN HALLINAN DIAMOND & JONES, LLP

By: [Signature]  
David Cramer, Esq., Id. No.307873  
Attorney for Plaintiff

PH # 682542

FILED *ICC Atty Cramer*  
OCT 25 2016  
11:15 AM  
BRIAN K. SPENCER  
PROTHONOTARY & CLERK OF COURTS

David Cramer, Esq., Id. No.307873  
PHELAN HALLINAN DIAMOND & JONES,  
LLP

Attorney for Plaintiff

1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
david.cramer@phelanhallinan.com  
Identification No: 307873  
215-563-7000

CITIMORTGAGE, INC. S/B/M TO ABN  
AMRO MORTGAGE GROUP, INC.  
Plaintiff

: Court of Common Pleas  
:  
: Civil Division  
:  
: CLEARFIELD County

v.

MATTHEW E. JOHNSON  
STEPHANIE M. JOHNSON  
Defendants

: No. 2008-1939-CD  
:  
:

PRAECIPE FOR VOLUNTARY SUBSTITUTION OF PARTY PLAINTIFF  
PURSUANT TO Pa.R.C.P., 2352

TO THE PROTHONOTARY:

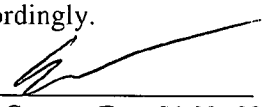
Kindly substitute DITECH FINANCIAL LLC F/K/A GREEN TREE SERVICING LLC as  
successor Plaintiff for the originally named Plaintiff.

The material facts on which the right of succession and substitution are based as follows:

DITECH FINANCIAL LLC F/K/A GREEN TREE SERVICING LLC is the current  
holder of the mortgage by virtue of that certain Assignment of Mortgage, which  
Assignment was recorded on 07/27/2016 in Instrument Number 201608658 of the  
Recorder of Deeds Office in and for CLEARFIELD County.

Kindly amend the information on the docket accordingly.

Date: 10/24/16  
PH # 682542

By:   
David Cramer, Esq., Id. No.307873  
Attorney for Plaintiff

FILED

FILED

ICC Atty  
Cramer

OCT 25 2016

M/11:15/16

BRIAN K. SPENCER

PROTHONOTARY & CLERK OF COURTS

David Cramer, Esq., Id. No.307873  
PHELAN HALLINAN DIAMOND & JONES,  
LLP

1617 JFK Boulevard, Suite 1400

One Penn Center Plaza

Philadelphia, PA 19103

david.cramer@phelanhallinan.com

Identification No: 307873

215-563-7000

CITIMORTGAGE, INC. S/B/M TO ABN

AMRO MORTGAGE GROUP, INC.

Plaintiff

Attorney for Plaintiff

v.

MATTHEW E. JOHNSON

STEPHANIE M. JOHNSON

Defendants

: Court of Common Pleas

:

: Civil Division

:

: CLEARFIELD County

:

: No. 2008-1939-CD

:

:

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of DITECH FINANCIAL LLC F/K/A  
GREEN TREE SERVICING LLC.

Date: 10/24/16

PHELAN HALLINAN DIAMOND & JONES, LLP

By: [Signature]

David Cramer, Esq., Id. No.307873

Attorney for Plaintiff

PH # 682542

FILED ICC Atty Cramer

OCT 25 2016  
M/11:15/16  
BRIAN K. SPENCER  
PROTHONOTARY & CLERK OF COURTS

David Cramer, Esq., Id. No. 307873  
PHELAN HALLINAN DIAMOND & JONES,  
LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
david.cramer@phelanhallinan.com  
Identification No: 307873  
215-563-7000

Attorney For Plaintiff

CITIMORTGAGE, INC. S/B/M TO ABN  
AMRO MORTGAGE GROUP, INC.  
Plaintiff

v.

MATTHEW E. JOHNSON  
STEPHANIE M. JOHNSON  
Defendants

: Court of Common Pleas  
:  
: Civil Division  
:  
: CLEARFIELD County  
:  
: No. 2008-1939-CD  
:  
:

CERTIFICATION OF SERVICE

I hereby certify that true and correct copies of the foregoing Plaintiff's Praeipie to Mark Judgment to DITECH FINANCIAL LLC F/K/A GREEN TREE SERVICING LLC, Substitution of Party Plaintiff and Entry of Appearance were served by regular mail on the person(s) on the date listed below:

MATTHEW E. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

STEPHANIE M. JOHNSON  
999 FRIENDLY ACRES ROAD  
CURWENSVILLE, PA 16833-7707

Wesley B. Thurston  
1 North 2nd Street,  
Suite 116,  
Clearfield, PA 16830

Date: 10/24/16

PH # 682542

Phelan Hallinan Diamond & Jones, LLP

By: [Signature]  
David Cramer, Esquire

Attorney for Plaintiff

Jennie C. Tsai, Esq., Id. No.315213  
PHELAN HALLINAN DIAMOND & JONES,  
LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
Jennie.Tsai@phelanhallinan.com  
Identification No: 315213  
215-563-7000

Attorney for Plaintiff

**FILED**  
m/12/13 (23) 12:16 P  
JAN 04 2017  
7:00 PM LL Atty. Tsai  
BRIAN K. SPENCER  
PROTHONOTARY & CLERK OF COURTS

DITECH FINANCIAL LLC F/K/A GREEN : Court of Common Pleas  
TREE SERVICING LLC :  
Plaintiff : Civil Division  
v. :  
: CLEARFIELD County  
MATTHEW E. JOHNSON :  
STEPHANIE M. JOHNSON : No. 2008-1939-CD  
Defendants :  
:

**PRAECIPE**

TO THE PROTHONOTARY:

- ☐ Please withdraw the complaint and mark the action discontinued and ended without prejudice.
- ☐ Please mark the above referenced case settled, discontinued and ended.
- ☒ Please Vacate the judgment entered and mark the action discontinued and ended without prejudice.
- ☐ Please mark the in rem judgment satisfied and the action discontinued and ended.
- ☐ Please vacate the judgment.

Date: JAN 03 2017

Phelan Hallinan Diamond & Jones, LLP

By: 

Jennie C. Tsai, Esquire  
Attorney for Plaintiff

PH # 682542

PH # 682542

Jennie C. Tsai, Esq., Id. No.315213  
PHELAN HALLINAN DIAMOND & JONES,  
LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
Jennie.Tsai@phelanhallinan.com  
Identification No: 315213  
215-563-7000

Attorney For Plaintiff

DITECH FINANCIAL LLC F/K/A GREEN  
TREE SERVICING LLC  
Plaintiff

v.

MATTHEW E. JOHNSON  
STEPHANIE M. JOHNSON  
Defendants

: Court of Common Pleas  
:  
: Civil Division  
:  
: CLEARFIELD County  
:  
: No. 2008-1939-CD  
:  
:

**CERTIFICATION OF SERVICE**

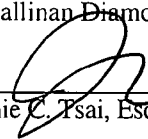
I hereby certify true and correct copies of the foregoing Plaintiff's Praecipe was served by regular mail to the person(s) on the date listed below:

MATTHEW E. JOHNSON  
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Date: **JAN 03 2017**

PH # 682542

Phelan Hallinan Diamond & Jones, LLP

By:   
Jennie C. Tsai, Esquire

Attorney for Plaintiff