

08-1939-CD
Citimortgage Inc vs Stephanie Johnson al

5
FILED

OCT 10 2008

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

2 cent - 5 cent

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

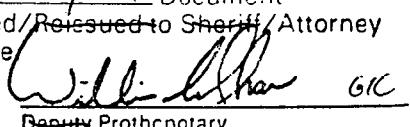
Plaintiff

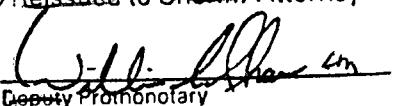
v.

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

Defendants

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

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

NOTICE

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

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

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

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

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

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

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

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FOLLOWING FIRST CONTACT WITH YOU BEFORE
SUING YOU TO COLLECT THIS DEBT. EVEN THOUGH**

**THE LAW PROVIDES THAT YOUR ANSWER TO THIS
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AND ADDRESS OF THE ORIGINAL CREDITOR WITHIN
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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>
TOTAL	\$58,738.90

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: Shital M ID No. 81760

LAURENCE T. PHELAN, ESQUIRE
FRANCIS S. HALLINAN, ESQUIRE
DANIEL G. SCHMIEG, ESQUIRE
MICHELE M. BRADFORD, ESQUIRE
JUDITH T. ROMANO, ESQUIRE
SHEETAL R. SHAH-JANI, ESQUIRE
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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 F. 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.

Shatali M. ID NO. 81760
Attorney for Plaintiff

DATE: 10/9/08

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

CITIMORTGAGE, INC. s/b/m

vs

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

SERVICE # 2 OF 2

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

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS

VACANT

OCCUPIED

ATTEMPTS

10-21-08-9:22 AM -10/H-Left Note 11-6-08-10:48 AM -10/H-Left Note
11-4-08-9:12 AM -W/H 11-5-08-9:42 AM -W/H

SHERIFF'S RETURN

NOW, 11-10-2008 AT 10:05 AM 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

10th DAY OF Nov. 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY: C.A.H. Deputy Signature

C.E. Siga Print Deputy Name

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

CITIMORTGAGE, INC. s/b/m

vs

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

SERVE BY: 11/09/2008

HEARING: 10/10/2008

PAGE: 104771

SERVICE # 1 OF 2

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 AM - N/H - LEFT Note 11-6-08-10:48 AM - N/H - LEFT Note
11-4-08-9:12 AM 11-5-08-9:42 AM - N/H

SHERIFF'S RETURN

s **FILED**

01-3-26-09
NOV 25 2008

William A. Shaw
Prothonotary/Clerk of Courts

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 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

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

James E. Davis

Deputy-Signature

James E. Davis

Print Deputy Name

SWORN TO BEFORE ME THIS

DAY OF 2008

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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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

Plaintiff
v.

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

Defendants

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 2008-1939-C0

CLEARFIELD COUNTY

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

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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
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CURWENSVILLE, PA 16833

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6. The following amounts are due on the mortgage:

Principal Balance	\$53,547.00
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05/01/2008 through 10/09/2008 (Per Diem \$9.72)	
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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.

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PHELAN HALLINAN & SCHMIEG, LLP

By: Sheetal M ID No. 81760

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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.

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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

Shutal Mij 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
03:30 PM
FEB 04 2009
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2008



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
m10:0031 cc
MAR 02 2009 (60)

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
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

Plaintiff

CIVIL DIVISION

v.

TERM

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

NO. 2008-1939-CO

CLEARFIELD COUNTY

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
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

Plaintiff
v.

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

Defendants

COURT OF COMMON PLEAS
CIVIL DIVISION
TERM
NO. 2008- 1939-C1
CLEARFIELD COUNTY

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.

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

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

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

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

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

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

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

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

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

1. Plaintiff is

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>
TOTAL	\$58,738.90

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: Sheetal M 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

Shutal Mij ID 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

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

SERVICE # 1 OF 2

SERVE BY: 11/09/2008

HEARING: 10/10/2008

PAGE: 104771DEFENDANT: STEPHANIE M. JOHNSON
ADDRESS: 999 FRIENDLY ACRES ROAD
CURWENSVILLE, PA 16833

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AARCIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

10-21-08-9:22 AM-N/H-LEFT Notes 11-6-08-10:45 AM-N/H-LEFT Notes
11-4-08-9:12 AM-N/H 11-5-08-9:42 AM-N/HSHERIFF'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. JOHNSONREASON UNABLE TO LOCATE LEFT NOTES, NO Response

SWORN TO BEFORE ME THIS

DAY OF 2008So Answers: CHESTER A. HAWKINS SHERIFFBY: James E. Davis

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 statements 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.

Brendan Booth
AFFIANT - Brendan Booth
Full Spectrum Services, Inc.

Sworn to and subscribed before me this 6th 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.

Date: February 27, 2009

Respectfully submitted,
Phelan Hallinan & Schmieg, L.L.P.
By: Daniel G. Schmieg,
Daniel G. Schmieg, Esquire
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

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

vs.

: CIVIL DIVISION
NO. 2008-1939-CD

Stephanie M. Johnson
Matthew E. Johnson

:
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

PRAECLPICE 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
M 7/5/09 Atty pd
MAR 03 2009 7.00

S William A. Shaw
Prothonotary/Clerk of Courts

(Compl.)

④ Reinstated to
Atty

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

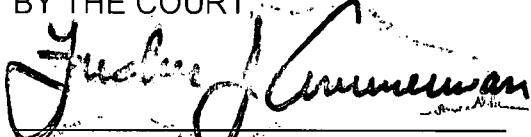
O R D E R

NOW, this 2nd 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 302
03/03/2009 Amy Schmieg
MAR 03 2009 (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

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 *Atty pd. 7:00*
m10:40A APR 03 2009 1 Compl. Reinstated
S to Sheriff
William A. Shaw
Prothonotary/Clerk of Courts
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

STEPHANIE M. JOHNSON and MATTHEW E. JOHNSON

COMPLAINT IN MORTGAGE FORECLOSURE, PRAECIPE & ORDER

SERVICE # 1 OF 1

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

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 AM / PM POSTED THE WITHIN

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

AT (ADDRESS) 999 Friendly Acres Road
Curwenville, 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

FILED

APR 06 2009

William A. Shaw
Prothonotary/Clerk of Courts

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

vs.

Stephanie M. Johnson
Matthew E. Johnson

Defendant(s)

ATTORNEY FOR PLAINTIFF

: Court Of Common Pleas

: Civil Division

: Clearfield County

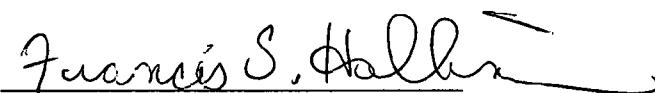
: No. 08-1939-CD

5
FILED
MTO:3880X
APR 13 2009
William A. Shaw
Prothonotary/Clerk of Courts
LAW

**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, 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/B/M TO ABN : COURT OF COMMON PLEAS
AMRO MORTGAGE GROUP, INC. :
Plaintiff : CIVIL DIVISION

vs. : CLEARFIELD COUNTY

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

PRAECIPE TO REINSTATE CIVIL ACTION/MORTGAGE FORECLOSURE

FILED *Atty pd*
MAY 21 2009 7:00
MAY 21 2009
S I Compl.
William A. Shah
Prothonotary/Clerk of Courts
Reinstated
to Atty

TO THE PROTHONOTARY:

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

PHELAN HALLINAN & SCHMIEG, LLP

By: 11/20/2023

Lawrence T. Phelan, Esquire

Francis S. Hallinan, Esquire

Daniel G. Schmieg, Esquire

Michele M. Bradford, Esquire

Judith T. Roman, Esquire

Sheetal R. Shah-Jani, Esquire

Jenine R. Davey, Esquire

Lauren R. Tabas, Esquire

Vivek Srivastava, Esquire

Jay B. Jones, Esquire

Peter J. Muleahy, Esquire

Andrew L. Spivack, Esquire

Jaime McGuinness, Esquire

Christopher P. Fliakos, Esquire

Joshua I. Goldman, Esquire

Attorneys for Plaintiff

Date: May 20, 2009

/sam, Svc Dept.
File# 183640

5 FILED NO CC
M 11:03 AM
JUN 16 2009
William A. Shaw
Prothonotary/Clerk of Courts
LLP

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
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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.

Stephanie M. Johnson
Matthew E. Johnson

: Clearfield County

: 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: Jenine R. Davey
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 PLAES OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION—LAW
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, Cunwenvsille, 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
(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, 2012
Member, Pennsylvania Association of Notaries

PROOF OF PUBLICATION

NIA :

LD :

I, 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

before me the day and year aforesaid.



Stephanie McAvey
Full Spectrum Services, Inc.
400 Fellowship Road, Ste. 220
Mount Laurel, NJ 08054

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.

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NOTICE

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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
DAVIDS. MEHOLICK,
COURT ADMINISTRATOR
CLEARFIELD COUNTY
COURTHOUSE
CLEARFIELD, PA 16380
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 suit within 20 days from service thereof and for foreclosure and sale of the es, and assess Plaintiff's damages as follows:

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

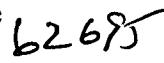
Chrisovalante P. Fliakos, Esquire

Joshua I. Goldman, Esquire

Courtenay R. Dunn, Esquire

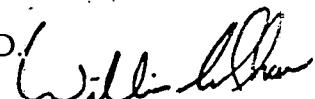
Andrew C. Bramblett, Esquire

Attorney for Plaintiff



DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 1-2-09



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

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

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

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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

(Rule of Civil Procedure No. 236) – Revised

**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

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

By William Johnson DEPUTY

If you have any questions concerning this matter please contact:

Lawrence T. Phelan, Esquire
Francis S. Hallinan, Esquire L2695
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 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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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
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.

COURT OF COMMON PLEAS
CIVIL DIVISION

Plaintiff

NO. 2008-1939-CD

v.

CLEARFIELD COUNTY

STEPHANIE M. JOHNSON
MATTHEW E. JOHNSON

Defendant(s)

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.

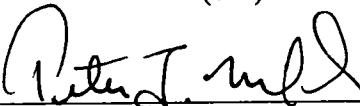
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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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Courtenay R. Dunn, Esq., Id. No. 206779
Andrew C. Bramblett, Esq., Id. No. 208375
Phelan Hallinan & Schmieg, LLP
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103

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
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.

COURT OF COMMON PLEAS
CIVIL DIVISON

Plaintiff

NO. 2008-1939-CD

v.

CLEARFIELD COUNTY

STEPHANIE M. JOHNSON
MATTHEW E. JOHNSON

Defendant(s)

TO: MATTHEW E. 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.

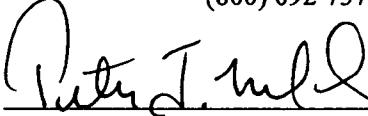
YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

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
Judith T. Romano, Esq., Id. No. 58745
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Andrew C. Bramblett, Esq., Id. No. 208375
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	\$61,266.10
Interest from 6/27/09 to Sale	\$ _____.
Per diem \$	
Add'l Costs	\$3,001.21
Writ Total	\$

Prothonotary costs *156.00*


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 *6/10*
Att'y pd. 20.00
7/1/11 2:16 PM
JUL 08 2009
1CC Colewitts
William A. Shaw
Prothonotary/Clerk of Courts
w/prop. desc.
to Sheriff

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

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

FILED

JUL 08 2009

William A. Shaw
Prothonotary/Clerk of Courts

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

vs.

STEPHANIE M. JOHNSON
MATTHEW E. JOHNSON

PRAECEIPE 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

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

FHELAN HALLINAN & SCHMIEG

By: DANIEL G. SCHMIEG

Identification No. 62205

JAY B. JONES

Identification No. 86657

ANDREW L. SPIVACK

Identification No. 84439

JENINE R. DAVEY

Identification No. 87077

Suite 1400

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard

Philadelphia, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

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

:
: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS

Plaintiff, :
v. : CIVIL DIVISION

STEPHANIE M. JOHNSON :
MATTHEW E. JOHNSON : NO. 2008-1939-CD

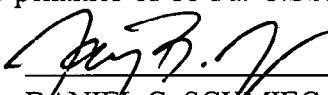
:
:
:
:
:
:

Defendant(s). :
:
:
:
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 it is:

- an FHA Mortgage
- non-owner occupied
- vacant
- Act 91 procedures have been fulfilled

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



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

CITIMORTGAGE, INC. S/B/M TO ABN	:	
AMRO MORTGAGE GROUP, INC.	:	
	:	CLEARFIELD COUNTY
	:	COURT OF COMMON PLEAS
Plaintiff,	:	
v.	:	CIVIL DIVISION
STEPHANIE M. JOHNSON	:	NO. 2008-1939-CD
MATTEW E. JOHNSON	:	
	:	
Defendant(s).	:	
	:	
	:	

AFFIDAVIT PURSUANT TO RULE 3129.1

CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC., Plaintiff in the above action, by its attorney, DANIEL G. SCHMIEG, ESQUIRE, sets forth as of the date the Praecept for the Writ of Execution was filed, the following information concerning the real property located at **999 FRIENDLEY ACRES ROAD, CURWENSVILLE, PA 16833**.

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

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 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 so indicate.)
None	

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

NAME	ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
None	

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

NAME

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**

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

**Internal Revenue Service
Federated Investors Tower**

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

**Department of Public Welfare
TPL Casualty Unit
Estate Recovery Program**

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

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)**

MATTHEW E. JOHNSON

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	\$61,255.10
Prothonotary costs	156.00
Interest from 6/27/09 to Sale	\$ _____
Per diem \$	\$ _____
Add'l Costs	\$3,001.21
Writ Total	\$ _____

OFFICE OF THE PROTHONOTARY OF CLEARFIELD
COUNTY, PENNSYLVANIA

Dated

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

WRIT OF EXECUTION (Mortgage Foreclosure)	
Real Debt	\$61,266.10
Costs	_____
Prothy Rd.	<u>1540.00</u>
Sheriff	

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

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

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

MATTHEW 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
010:00pm
JUL 23 2009

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

____ Day of _____ 2009



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".

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: 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.

Name and
Address
of Sender

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



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

S FILED
OCT 10 2009
OCT 27 2009
NO CC
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

:
: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS

Plaintiff,

: CIVIL DIVISION

v.
STEPHANIE M. JOHNSON
MATTHEW E. JOHNSON

: NO. 08-1939-CD

Defendant(s).

**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: Jaime McGuinness

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, 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
Sheriffs 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. (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

ily 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.

PUBLISHING COMPANY Publisher of
UNTY SUNDAY/JEFFERSONIAN DEMOCRAT

3rd day of Sept, 2009

Connie L. Booth

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

ment of Advertising Cost
PUBLISHING COMPANY

Publisher of

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

DuBois, PA

II 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

reet and Beaver Drive, DuBois, PA 15801

ed 1879, Phone 814-371-4200

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 and for said County and State, personally appeared Gary A. Knaresbo, 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.



Amy Mae Gardner
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

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 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 OCTOBER 2, 2009 AT 10:00a.m., at the CLEARFIELD County Courthouse to enforce the OCourt judgment of \$61,266.10 obtained by, CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC. (the mortgagee), against your property. 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

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 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 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 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. 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.

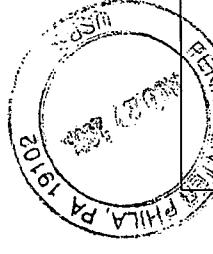
Brendan Booth
Full Spectrum Services, Inc.
400 Fellowship Rd, Suite 220
Mt. Laurel, NJ 08054

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

Name and
 Address
 of Sender

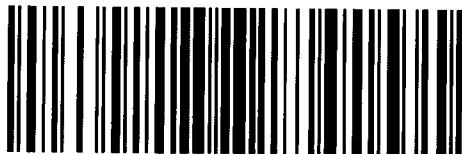
Line	Article Number	Name of Addressee, Street, and Post Office Address	Postal
1		STEPHANIE M. JOHNSON 999 FRIENDLEY ACRES ROAD CURWENSVILLE, PA 16833	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12		Re: STEPHANIE M. JOHNSON JJN 188640 TEAM 4	
Total Number of Pieces Listed by Sender	Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)	<p>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.</p> <p>UNITED STATES POSTAGE  PITNEY BOWES \$ 01.26⁰ 02 1M 0004218010 AUG 27 2009 MAILED FROM ZIP CODE 19103</p>

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

[Track & Confirm](#)

Enter Label/Receipt Number.

Notification Options

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 Gal](#)

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No FEAR Act EEO Data

FOIA



Equal Employment Opportunity Data



Intergovernmental Management

RUSH

AFFIDAVIT OF SERVICE

PLAINTIFF CITIMORTGAGE, INC. S/B/M TO ABN AMRO CLEARFIELD County
MORTGAGE GROUP, INC. No. 2008-1939-CD
Our File #: 188640

DEFENDANT(S) STEPHANIE M. JOHNSON Type of Action
MATTEW E. JOHNSON - 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 2nd day of SEPTEMBER,
2009, at 5:07, o'clock P.m., at 999 FRIENDLEY Acres Rd., Curwenville, 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 3rd 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:

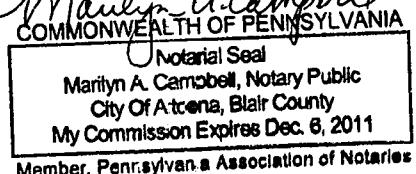
Moved Unknown No Answer Vacant
1st attempt Date: _____ Time: _____, 2nd attempt Date: _____ Time: _____, 3rd
attempt Date: _____ Time: _____.
Other:

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



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

S 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, OCTOER 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
by Cynthia Ditter - Authority
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

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No. 2008-1939-CD

**WRIT OF EXECUTION
(Mortgage Foreclosure)**

MATTHEW E. JOHNSON

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	\$61,266.10
Prothonotary costs	156.00
Interest from 6/27/09 to Sale	\$ _____
Per diem \$	\$ _____
Add'l Costs	\$3,001.21
Writ Total	\$ _____

Dated 7/8/09 (SEAL)

OFFICE OF THE PROTHONOTARY OF CLEARFIELD
COUNTY, PENNSYLVANIA

188640

Received this writ this 8th day
of July A.D. 2009
At 2:00 A.M./P.M.

Charles A. Hawkins
Sheriff by Cynthia Butler, Asst. Sheriff

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

WRIT OF EXECUTION (Mortgage Foreclosure)	
Costs	Costs
Real Debt	\$61,266.10
Int. from 6/27/09 To Date of Sale (\$ per diem)	
Costs	
Prothy Pd.	<u>1516.00</u>


Sheriff
DANIEL G. SCHMIDT, ESQUIRE
JAY B. JONES, ESQUIRE
ANDREW L. SPVACK, ESQUIRE
JENNIE R. DAVEY, ESQUIRE
Attorney for Plaintiff

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

MATTHEW 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 2nd 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. Ammerman
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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Matt Johnson
 Agent
 Addressee

B. Received by (Printed Name)

MATT Johnson

C. Date of Deliver

8-11-09

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

3. Service Type

<input 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) Yes

2. Article Number

(Transfer from service label)

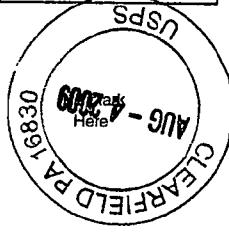
7008 3230 0003 3590 8089

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-15

U.S. Postal Service™ CERTIFIED MAIL™ RECEIPT (Domestic Mail Only, No Insurance Coverage Provided)																
For delivery information visit our website at www.usps.com																
OFFICIAL USE																
3590 0003 3230 7008	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; text-align: right; padding: 2px;">Postage</td> <td style="width: 90%; text-align: right; padding: 2px;">\$</td> <td style="width: 10%; text-align: right; padding: 2px;">8089</td> </tr> <tr> <td style="text-align: right; padding: 2px;">Certified Fee</td> <td colspan="2" style="text-align: right; padding: 2px;"> </td> </tr> <tr> <td style="text-align: right; padding: 2px;">Return Receipt Fee (Endorsement Required)</td> <td colspan="2" style="text-align: right; padding: 2px;"> </td> </tr> <tr> <td style="text-align: right; padding: 2px;">Restricted Delivery Fee (Endorsement Required)</td> <td colspan="2" style="text-align: right; padding: 2px;"> </td> </tr> <tr> <td style="text-align: right; padding: 2px;">Total Postage & Fees</td> <td style="width: 50%; text-align: right; padding: 2px;">\$</td> <td style="width: 50%; text-align: right; padding: 2px;">5.71</td> </tr> </table>	Postage	\$	8089	Certified Fee			Return Receipt Fee (Endorsement Required)			Restricted Delivery Fee (Endorsement Required)			Total Postage & Fees	\$	5.71
Postage	\$	8089														
Certified Fee																
Return Receipt Fee (Endorsement Required)																
Restricted Delivery Fee (Endorsement Required)																
Total Postage & Fees	\$	5.71														
Sent To Street, Apt. No. STEPHANIE M. JOHNSON or PO Box No. 999 FRIENDLY ACRES ROAD City, State, ZIP+4 CURWENSVILLE, PA 16833																
PS Form 3800, August 2000																
See Reverse for Instructions																



Clearfield PA 16830
Aug 11 2009
Hand

**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	
TOTAL SHERIFF COSTS	\$226.93

DEED COSTS:

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

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
TOTAL DEBT AND INTEREST	\$64,307.31
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	
TOTAL COSTS	\$1,095.18

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

Foreclosure Manager

Representing Lenders in
Pennsylvania and New Jersey

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

Foreclosure Manager

Representing Lenders in
Pennsylvania and New Jersey

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	
Adc'l Costs	\$6,178.82
Writ Total	\$ _____
Prothonotary costs	
<i>[Handwritten signature]</i>	
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 Atty fd. 7/1/1981 \$20.00
S AUG 16 2010 1cc & lewonts
William A. Shaw
Prothonotary/Clerk of Courts
w/prop. desc.
to Sheriff
(60)

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

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

vs.

FILED

AUG 16 2010

William A. Shaw
Prothonotary/Clerk of Courts

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
- Lauren R. Tabas, Esq., Id. No. 933337
- 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. Filiakos, 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

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
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- Jenine R. Davey, Esq., Id. No. 87077
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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.	:	COURT OF COMMON PLEAS
Plaintiff	:	CIVIL DIVISION
Defendant(s)	:	NO. 2008-1939-CD
STEPHANIE M. JOHNSON MATTHEW E. JOHNSON	:	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 Praecept 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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- 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

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:

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

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

OFFICE OF THE PROTHONOTARY OF CLEARFIELD
COUNTY, PENNSYLVANIA

Dated 8/16/10
(SEAL)

PHS # 188640

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)

	Costs
Real Debt	
Int. from	\$61,266.10
To Date of Sale (\$10.0 / per diem)	
Costs	
Prothy Pd.	<u>170.00</u>
Sheriff	

Filed


Attorney for Plaintiff

Phelan Hallinan & Schmieg, LLP

- Lawrence L. 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. 933337
- 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. Filakos, Esq., Id. No. 91620
- 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

CA

PHELAN HALLINAN & SCHMIEG, LLP
Lawrence T. Phelan, Esq., Id. No. 32227
Francis S. Hallinan, Esq., Id. No. 62695
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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

Attorney for Plaintiff

FILED
MTO:35 AD NO CC
OCT 22 2010

S William A. Shaw
Prothonotary/Clerk of Courts
(60)

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

Plaintiff

v.

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

CLEARFIELD COUNTY
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 2008-1939-CD

Defendants

**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
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Sheetal R. Shah-Jani, Esq., Id. No. 81760
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Jeshua I. Goldman, Esq., Id. No. 205047
Courtenay R. Dunn, Esq., Id. No. 206779
Andrew C. Bramblett, Esq., Id. No. 208375
Attorneys for Plaintiff

PHELAN HALLINAN & SCHMIEG, LLP

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

CITIMORTGAGE, INC. S/B/M TO ABN AMRO	:	
MORTGAGE GROUP, INC.	:	CLEARFIELD COUNTY
	:	COURT OF COMMON PLEAS
Plaintiff	:	
v.	:	CIVIL DIVISION
STEPHANIE M. JOHNSON	:	
MATTHEW E. JOHNSON	:	NO. 2008-1939-CD
	:	
Defendants	:	
	:	

PLAINTIFF'S MEMORANDUM OF LAW

Pursuant to Pennsylvania Rule of Civil Procedure, Rule 3129.2, it is necessary in a foreclosure action for the Sheriff or Process Server to serve upon the Defendant Notice of the Sale of the mortgaged premises. Specifically, Pa.R.C.P., Rule 3129.2 (c) provides in applicable part as follows:

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

AFFIDAVIT OF SERVICE (FHLMC)

CLEARFIELD COUNTY

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

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:

On the 25th 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 29th day
 of September, 2010. By:

D.M. ELLIS
Om 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. Schmitz, Esq., Id. No. 62205
 Michele M. Bradford, Esq., Id. No. 69849
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 Joshua I. Goldman, Esq., Id. No. 205047
 Courtenay R. Dunn, Esq., Id. No. 206779
 Andrew C. Brimblett, 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

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

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

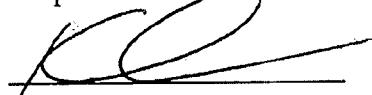
Matthew J. Johnson

* 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 statements 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

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
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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
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

v.

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. Phefan, 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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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. 295047
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 * NO. 08-1939-CD
MORTGAGE GROUP, INC. *
Plaintiff *
vs *
STEPHANIE M. JOHNSON *
MATTHEW E. JOHNSON *
Defendants *

ORDER

NOW, this 25th 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.

FILED

01/4/2011
OCT 26 2010

William A. Shaw
Prothonotary/Clerk of Courts

3cc Atty Srivastava

BY THE COURT,


FREDRIC J. AMMERMAN
President Judge

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
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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

4 FILED
m7137831 NO
OCT 29 2010
cc
William A. Shaw
Prothonotary/Clerk of Courts

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

:
: **CLEARFIELD COUNTY**
: **COURT OF COMMON PLEAS**
: **CIVIL DIVISION**
: **NO. 2008-1939-CV**

STEPHANIE M. JOHNSON
MATTHEW E. JOHNSON

Defendants

**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 **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
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Andrew L. Spivack, Esq., Id. No. 84439
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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-CC
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 Pennsylvania

TAX
PARCEL#125-F10-000-00101
Improvements consist of residential property.

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 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 obtained by, CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC. (the mortgagor), against the above premises.

PHELAN HALLINAN
& SCHMIEG, LLP
Attorney for Plaintiff

10:8-1d-b

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :
: SS:
COUNTY OF CLEARFIELD :

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.

Charly J. Robison
Notary Public
Clearfield, Pa.

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Charly 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 :
:

On this 8th day of October AD 2010, before me, the subscriber in and for said County and State, personally appeared Gary A. Knaresboro, 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

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 Pennsylvania TAX PARCEL#125-F1 0-000-00101 Improvements consist of residential property.

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 Sheriff's Sale on DECEMBER 3, 2010 at 10:00

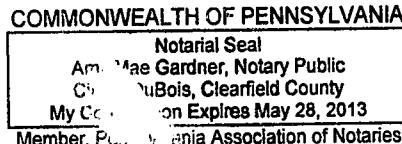
AM. at the CLEARFIELD County Court-house to enforce the Court Judgment of \$61,266.10 obtained by, CITIMORTGAGE, INC. S/B/M TO ABN AMRO MORTGAGE GROUP, INC. (the mortgagee), against the above premises.

PHELAN HALLINAN & SCHMIEG, LLP Attorney for Plaintiff


Gary A. Knaresboro, Esquire
Editor

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


Notary Public
My Commission Expires



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 2nd 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

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

FREDRIC J. AMMERMAN
President Judge

MAR 03 2009

Attest,

William L. Brown
Prothonotary/
Clerk of Courts

AFFIDAVIT OF SERVICE (FHLMC)
CLEARFIELD COUNTY

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

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

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

SERVED

Served and made known to STEPHANIE M. JOHNSON, Defendant on the 12 day of OCT, 2010 at 11:30 o'clock A.M., at 999 Friendly Acres, 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: Pasted.

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 abcve.

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

Notary: Elizabeth A. Ventre By: Elwood Marion
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

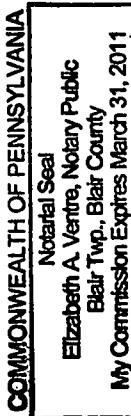
Other:

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

Notary:

ATTORNEY FOR PLAINTIFF

Lawrence T. Phelan, Esq., Id. No. 32227
Francis S. Hullinan, 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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Peter J. Mulcahy, Esq., Id. No. 61791
Andrew L. Spivack, Esq., Id. No. 84439
Jaime McGuinness, Esq., Id. No. 90134
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Joshua I. Goldman, Esq., Id. No. 205047
Courtney 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



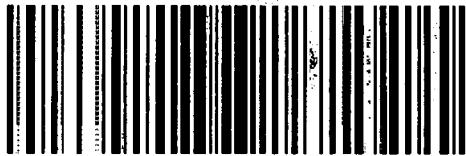
Name and
Address
of Sender

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

Line	Article Number	Name of Addressee, Street, and Post Office Address	
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		RE: STEPHANIE M. JOHNSON PHS#188640	
Total Number of Pieces Listed by Sender	Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)	



SPL



7178 2417 6099 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**

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

[Go >](#)

Track & Confirm

Enter Label/Receipt Number.

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)

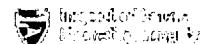
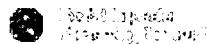
Verify who signed for your item by email. [Go >](#)

[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 : CLEARFIELD COUNTY
MORTGAGE GROUP, INC. :
Plaintiff, : COURT OF COMMON PLEAS
v. :
CIVIL DIVISION
STEPHANIE M. JOHNSON :
MATTHEW E. JOHNSON :
Defendant(s) : 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
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 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

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.

PHS # 188640

FILED
NOV 16 2010
S 111-0236-100
William A. Shaw
Prothonotary/Clerk of Courts

Name and
Address
Of Sender

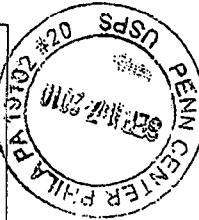
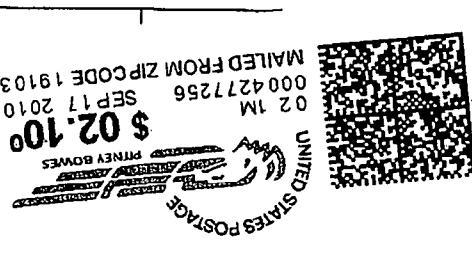
Phelan Hallinan & Schmieg, LLP
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103



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. Cobville, 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) TEAM PHILADELPHIA, PA 19103		

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 \$10,000 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. Bedford, 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

S 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

**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 Q. Schmieg, Esquire
Michele M. Bradford, Esquire
Judith T. Romano, Esquire
Sheetal R. Shah-Jani, Esquire
Jenire 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

*
*
*
*
*
*

O R D E R

NOW, this 25th 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 this to be a true
and accurate copy of the original
statement filed in this case.

OCT 26 2010

Attest:

William J. Ammerman
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 residential property.
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 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 obtained by, CITIMORTGAGE, INC., S/B/M TO ABN AMRO MORTGAGE GROUP, INC. (the mortgagor), against the above premises.
PHELAN HALLINAN
& SCHMIEG, LLP
Attorney for Plaintiff

11:5-1d-b

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA

SS:

COUNTY OF CLEARFIELD

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

Gary A. Knaresboro
Gary A. Knaresboro, Esquire
Editor

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

Amy Mae Gardner
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. JOHNSONSERVICE TEAM/ kxc
COURT NO.: 2008-1939-CD

SERVE MATTHEW E. JOHNSON AT:

999 FRIENDLY ACRES ROAD
CURWENSVILLE, PA 16833-7707

PLEASE RUSHPLEASE 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 ^{RP} day of Nov, 20 10, at 7:40, o'clock P. M., at 999 Friendly Fences 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, 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 8th dayof November 20 10.

Notary:

Elizabeth A. Ventre By: Dmeller

NOT SERVED

On the _____ day of _____, 20 10, 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

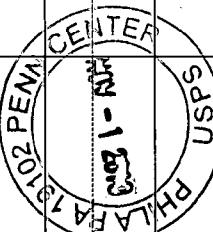
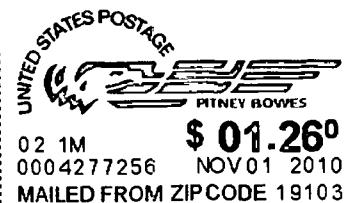
(215) 563-7000

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	Postage	Fee
1	****	MATTHEW E. JOHNSON 999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833-7707		
2	****			
3	****			
4	****			
5				
6	****			
7	****			
8	****			
9	****			
10	****			
11	****			
12	****			
13	****			
14				
15		RE: MATTHEW E. JOHNSON PHS#188640		
Total Number of Pieces Listed by Sender		Postmaster, Per (Name of Receiving Employee)		
Total Number of Pieces Received at Post Office				



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.

[Go >](#)

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

Track & Confirm

Enter Label/Receipt Number.

[Go >](#)

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)

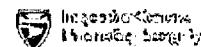
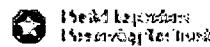
Verify who signed for your item by email. [Go >](#)

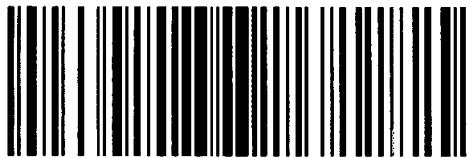
[Site Map](#) [Customer Service](#) [Forms](#) [Gov't Services](#) [Careers](#) [Privacy Policy](#) [Terms of Use](#) [Business Customer Gateway](#)

Copyright© 2010 USPS. All Rights Reserved.

No FEAR Act EEO Data

FOIA





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

07/28/11
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

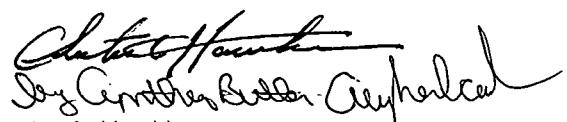
Execution REAL ESTATE

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.

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	\$61,266.10	176.00
Per diem \$10.07	\$	
Add'l Costs	\$6,178.82	
Writ Total	\$	



OFFICE OF THE PROTHONOTARY OF CLEARFIELD
COUNTY, PENNSYLVANIA

Dated 8/16/10
(SEAL)

PHS # 188640

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

Charles A. Hawkins
Sheriff Deputy Committee, Butler, Aug 16, 2010

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)

	Costs
Real Debt	\$61,266.10
Int. from To Date of Sale (\$10.07 per diem)	
Costs	
Protho Pd.	<u>170.00</u>
Sheriff	

Filed



Attorney for Plaintiff

Phelan Hallinan & Schmieg, LLP

- Lawrence T. Phelan, Esq., Id. No. 322227
- 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
- Jerrine R. Davey, Esq., Id. No. 87077
- Lauren R. Tabas, Esq., Id. No. 933337
- 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. Filiacos, 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

**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	
TOTAL SHERIFF COSTS	\$243.24

DEED COSTS:

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

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	
TOTAL DEBT AND INTEREST	\$70,284.38

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	
TOTAL COSTS	\$1,173.49

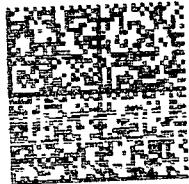
DISTRIBUTION WILL BE MADE IN ACCORDANCE WITH THE ABOVE SCHEDULE UNLESS EXCEPTIONS ARE FILED WITH THIS OFFICE **WITHIN TEN (10) DAYS FROM THIS DATE.**

CHESTER A. HAWKINS, Sheriff

**CHESTER A. HAWKINS
SHERIFF**



2008 3230 0003 3590 9000



Q16H16505405

\$05.710

09/29/2010

Mailed From 16230
US POSTAGE

Hässler

SC
OR

9.30 ✓

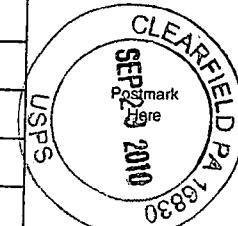
STEPHANIE M. JOHNSON
999 FRIENDLY ACRES ROAD
CURWENSVILLE, PA 16833

NIXIE 183 DE 1 00 10/15/10

RETURN TO SENDER
UNCLAIMED
UNABLE TO FORWARD

BC: 16830247201 *0596-04530-15-27

16830002472

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
<i>(Domestic Mail Only. No Insurance Coverage Provided)</i>	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$ 61
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 6.71
 CLEARFIELD PA Postmark Here SEP 2010 16830	
Sent To	
Street, Apt. No., or PO Box No.	STEPHANIE M. JOHNSON
City, State, ZIP+4	999 FRIENDLY ACRES ROAD CURWENSVILLE, PA 16833

**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

COMPLETE THIS SECTION ON DELIVERY**A. Signature****X**

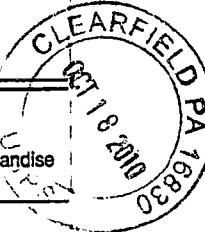
Agent
 Addressee

B. Received by (Printed Name)**C. Date of Delivery**

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

3. Service Type

Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes**2. Article Number***(Transfer from service label)*

7008 3230 0003 3590 9000

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

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. JOHNSON and MATTHEW E. JOHNSON
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

W
FILED ICC Atty
Cramer

S OCT 25 2016
0111:15 LT

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

v.

MATTHEW E. JOHNSON
STEPHANIE M. JOHNSON

Defendants

PRAECIPE TO MARK JUDGMENT TO USE PLAINTIFF

Attorney for Plaintiff

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

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

PH # 682542

PHELAN HALLINAN DIAMOND & JONES, LLP

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

12
FILED *cc Atty
Cramer*
S OCT 25 2016
10/11/15 12
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

v.

MATTHEW E. JOHNSON
STEPHANIE M. JOHNSON
Defendants

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

CA

12
FILED *cc Attorney
Cramer*

S OCT 25 2016
M/11/16/LP
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

v.

MATTHEW E. JOHNSON
STEPHANIE M. JOHNSON
Defendants

Attorney for Plaintiff

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

PH # 682542

CC Attorney
Cramer
FILED
S 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

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

MATTHEW E. JOHNSON
STEPHANIE M. JOHNSON
Defendants

CERTIFICATION OF SERVICE

I hereby certify that true and correct copies of the foregoing Plaintiff's Praeclipe 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

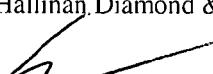
Wesley B. Thurston
1 North 2nd Street,
Suite 116,
Clearfield, PA 16830

Date: 10/24/16

PH # 682542

Phelan Hallinan Diamond & Jones, LLP

By:



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

DITECH FINANCIAL LLC F/K/A GREEN : Court of Common Pleas
TREE SERVICING LLC :
Plaintiff : Civil Division

v.

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

PRAECIPE

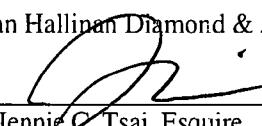
TO THE PROTHONOTARY:

- 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

Attorney for Plaintiff

FILED

1/13/2017 12:16 PM

JAN 04 2017

200 P.D. Atty. Tsai

BRIAN K. SPENCER
PROTHONOTARY & CLERK OF COURTS

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

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

MATTHEW E. JOHNSON
STEPHANIE M. JOHNSON
Defendants

:

CERTIFICATION OF SERVICE

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

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

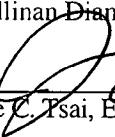
JAN 03 2017

Date: _____

Phelan Hallinan Diamond & Jones, LLP

By:

PH # 682542


Jennie C. Tsai, Esquire

Attorney for Plaintiff