

08-1986-CD
Beneficial Cons. Disc vs Ralph Stiner

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File: 22.09261

Beneficial Consumer Discount Company
D/B/A **Beneficial Mortgage Co of**
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

Plaintiff,

No.: 08-1986-CD

Vs.

CIVIL ACTION
MORTGAGE FORECLOSURE

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

FILED

OCT 16 2008

William A. Shaw
Prothonotary/Clerk of Courts

July 2 2009 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William A. Shaw
Deputy Prothonotary

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

Apr. 14 2009 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William A. Shaw
Deputy Prothonotary

OCT 16 2008

Attest.

William A. Shaw
Prothonotary/
Clerk of Courts

original missing

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

- 1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.**
- 2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.**
- 3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.**

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,**

Plaintiff,

Vs.

**Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

and

**Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

Defendants.

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

No.:

**CIVIL ACTION
MORTGAGE FORECLOSURE**

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830. Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from	
1/13/08 to 10/15/08	
@ 9.340% per annum	
(\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges.....	\$6.35

Reasonable Attorney's Fees	\$1,250.00
TOTAL as of 10/15/2008	\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. ' 4904, relating to unsworn falsification to authorities.



Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

EXHIBIT A

Exhibit A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 1 of 2 Services

Sheriff Docket # **104840**

BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A/ BENEFICIAL
MORTGAGE CO. of PENNSYLVANIA

Case # 08-1986-CD

vs.

RALPH J. STINER and ADELINE R. STINER

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW December 08, 2008 RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED" AS TO RALPH J. STINER, DEFENDANT. WRONG ADDRESS WAS PUT ON SERVICE SHEET

SERVED BY: /

S
FILED
0/1:50pm
DEC 09 2008

William A. Shaw
Prothonotary/Clerk of Courts

In The Court of Common Pleas of Clearfield County, Pennsylvania

Service # 2 of 2 Services

Sheriff Docket # **104840**

BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A/ BENEFICIAL
MORTGAGE CO. of PENNSYLVANIA

Case # 08-1986-CD

vs.

RALPH J. STINER and ADELINE R. STINER

TYPE OF SERVICE COMPLAINT IN MORTGAGE FORECLOSURE

SHERIFF RETURNS

NOW December 08, 2008 RETURNED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE "NOT SERVED, TIME EXPIRED: AS TO ADELINE R. STINER, DEFENDANT. WRONG ADDRESS WAS PUT ON SERVICE SHEET

SERVED BY: /

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104840
NO. 08-1986-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A/ BENEFICIAL MORTGAGE CO. of PENNSYLVANIA

VS.

DEFENDANT: RALPH J. STINER and ADELINE R. STINER

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
	NO COSTS		

Sworn to Before Me This

____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File: 22.09261

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,**

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

Plaintiff,

No.: 08-1986-CD

Vs.

**CIVIL ACTION
MORTGAGE FORECLOSURE**

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

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

OCT 16 2008

Attest.

William L. Harbert
Prothonotary/
Clerk of Courts

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

- 1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.**
- 2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.**
- 3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.**

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,**

Plaintiff,

Vs.

**Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

and

**Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

Defendants.

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

No.:

**CIVIL ACTION
MORTGAGE FORECLOSURE**

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830. Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from	
1/13/08 to 10/15/08	
@ 9.340% per annum	
(\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges.....	\$6.35

Reasonable Attorney's Fees\$1,250.00
TOTAL as of 10/15/2008\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

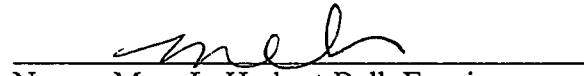
MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

Exhibit A

EXHIBIT A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File: 22.09261

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,**

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

Plaintiff,

No.: 08-1986-C

Vs.

**CIVIL ACTION
MORTGAGE FORECLOSURE**

**Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

and

**Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

Defendants.

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

OCT 16 2008

Attest.

William J. Harbert
Prothonotary/
Clerk of Courts

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

- 1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.**
- 2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.**
- 3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.**

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,**

Plaintiff,

Vs.

**Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

and

**Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

Defendants.

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

No.:

**CIVIL ACTION
MORTGAGE FORECLOSURE**

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830. Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from	
1/13/08 to 10/15/08	
@ 9.340% per annum	
(\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges.....	\$6.35

Reasonable Attorney's Fees	\$1,250.00
TOTAL as of 10/15/2008	\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

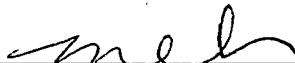
MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

EXHIBIT A

Exhibit A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File No. 22.09261

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania,**

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

Plaintiff,

Vs.

Ralph J. Stiner,

and

Adeline R. Stiner,

Defendants.

No.: 08-1986-CD

**Praeclipe to Reinstate Complaint in
Mortgage Foreclosure**

TO THE PROTHONOTARY:

Kindly reinstate the Complaint in Mortgage Foreclosure for the above captioned matter.

MILSTEAD & ASSOCIATES, LLC


Mary L. Harbert-Bell, Esquire
Attorney ID No. 80763

pd \$7.00 Atty
FILED 5/12/15 LM ICC to Atty
APR 14 2009 6 reinstated Complaint
to Shff.
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-1986-CD
BENEFICIAL CONSUMER DISCOUNT COMPANY d/b/a BENEFICIAL MORTGAGE CO. OF PA.
vs
RALPH J. STINER and ADELINE R. STINER
COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 05/14/2009 HEARING: PAGE: 105526

DEFENDANT: RALPH J. STINER
ADDRESS: 8777 GILLINGHAM ROAD
FRENCHVILLE, PA 16836

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT OCCUPIED

ATTEMPTS

5/18/2009
MAY 18 2009

William A. Shaw
Prothonotary/Clerk of Courts

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON RALPH J. STINER, 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 RALPH J. STINER

AT (ADDRESS) _____

NOW 5-18-09 AT 8:30 AM PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO RALPH J. STINER

REASON UNABLE TO LOCATE House Vacant

SWORN TO BEFORE ME THIS

DAY OF 2009

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Dominic L. Morgillo
Deputy Signature

Dominic L. Morgillo
Print Deputy Name

**SHERIFF'S OFFICE
CLEARFIELD COUNTY
CASE # 105526**

DEAR RALPH J. STINER

Would you please contact the DEPUTY AT _____ concerning legal papers we have for you

When you call, please give your name and the case # noted above (105526) and the deputy will make arrangements for service.

Thank you for your consideration in this matter.

SHERIFF CHESTER A. HAWKINS

OFFICE HOURS: 8:30 A.M. to 4:00 P.M.
PHONE (814) 765-2641

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File 22.09261

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

Plaintiff,

No.: 08-1986-CD

Vs.

CIVIL ACTION
MORTGAGE FORECLOSURE

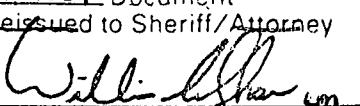
Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

Apr. 14, 2009 Document
Reinstated/Reissued to Sheriff/Attorney
for service.


William L. Harbert-Bell
Deputy Prothonotary

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

OCT 16 2008

Attest.


William L. Harbert-Bell
Prothonotary/
Clerk of Courts

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

- 1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.**
- 2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.**
- 3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.**

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

Plaintiff,

Vs.

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

No.:

CIVIL ACTION
MORTGAGE FORECLOSURE

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.
Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from	
1/13/08 to 10/15/08	
@ 9.340% per annum	
(\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges.....	\$6.35

Reasonable Attorney's Fees	\$1,250.00
TOTAL as of 10/15/2008	\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

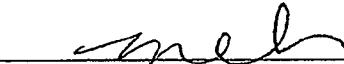
MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

Exhibit A

EXHIBIT A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

SHERIFF'S OFFICE
CLEARFIELD COUNTY
CASE # 105526

DEAR ADELINE R. STINER

Would you please contact the DEPUTY AT _____ concerning legal papers we have for you

When you call, please give your name and the case # noted above (105526) and the deputy will make arrangements for service.

Thank you for your consideration in this matter.

SHERIFF CHESTER A. HAWKINS

OFFICE HOURS: 8:30 A.M. to 4:00 P.M.
PHONE (814) 765-2641

Defendants.

April 14, 2009 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

C. A. Hawkins
Deputy Prothonotary

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

OCT 16 2008

Attest.

William A. Hawkins

Prothonotary/
Clerk of Courts

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

- 1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.**
- 2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.**
- 3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.**

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

Plaintiff,

Vs.

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

No.:

CIVIL ACTION
MORTGAGE FORECLOSURE

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.
Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from	
1/13/08 to 10/15/08	
@ 9.340% per annum	
(\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges.....	\$6.35

Reasonable Attorney's Fees	\$1,250.00
TOTAL as of 10/15/2008	\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

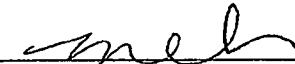
MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

Exhibit A

EXHIBIT A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1986-CD

BENEFICIAL CONSUMER DISCOUNT COMPANY d/b/a BENEFICIAL MORTGAGE CO. OF PA.

vs SERVICE # 3 OF 4

RALPH J. STINER and ADELINE R. STINER

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 05/14/2009

HEARING:

PAGE: 105526

DEFENDANT: RALPH J. STINER

ADDRESS: 1009 WILLOW DRIVE
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

NO Such ADDRESS

4/27/09 per atty thy:

1109 Willow Dr.
Clearfield

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

5-5-09- 10:19 AM NS/H 1109 Willow Drive. 5/13/09- 9:57 AM/H

5-9-09 11:00 AM NS/H

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON RALPH J. STINER, 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 **FILED**

COMPLAINT IN MORTGAGE FORECLOSURE FOR RALPH J. STINER

AT (ADDRESS) _____

*6/3/09
MAY 15 2009*

10

William A. Shaw

Prothonotary/Clerk of Courts

NOW 5-15-09 AT 8:10 AM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO RALPH J. STINER

REASON UNABLE TO LOCATE No Contact

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 2009

SHERIFF'S OFFICE
CLEARFIELD COUNTY
CASE # **105526**

DEAR RALPH J. STINER

Would you please contact the DEPUTY AT _____ concerning legal papers we have for you

When you call, please give your name and the case # noted above (**105526**) and the deputy will make arrangements for service.

Thank you for your consideration in this matter.

SHERIFF CHESTER A. HAWKINS

OFFICE HOURS: 8:30 A.M. to 4:00 P.M.
PHONE (814) 765-2641

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File # 22.09261

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

~~COURT OF COMMON PLEAS~~
~~CLEARFIELD COUNTY~~

Plaintiff,

No.: 08-1986-CD

Vs.

CIVIL ACTION
MORTGAGE FORECLOSURE

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

April 14, 2009 Document
Reinstated/Reissued to Sheriff Attorney
for service.

William L. Harber
Deputy Prothonotary

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

OCT 16 2008

Attest.

William L. Harber
Prothonotary/
Clerk of Courts

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

- 1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.**
- 2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.**
- 3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.**

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

Plaintiff,

Vs.

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

No.:

CIVIL ACTION
MORTGAGE FORECLOSURE

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.
Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from	
1/13/08 to 10/15/08	
@ 9.340% per annum	
(\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges.....	\$6.35

Reasonable Attorney's Fees\$1,250.00
TOTAL as of 10/15/2008\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

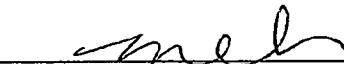
MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. ' 4904, relating to unsworn falsification to authorities.



Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

Exhibit A

EXHIBIT A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-1986-CD

BENEFICIAL CONSUMER DISCOUNT COMPANY d/b/a BENEFICIAL MORTGAGE CO. OF PA.

vs

RALPH J. STINER and ADELINE R. STINER

COMPLAINT IN MORTGAGE FORECLOSURE

SERVICE # 4 OF 4

SERVE BY: 05/14/2009

HEARING:

PAGE: 105526

DEFENDANT: ADELINE R. STINER

ADDRESS: 1009 WILLOW DRIVE
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

NO Such ADDRESS

4/27/09 per atty try:

*1109 Willow Drive
Clearfield.*

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

OCCUPIED

ATTEMPTS 5-5-09 - 10:19 AM NSH 1109 Willow Drive.

5-13-09 - 9:57 AM NSH

5-9-09 - 15:09 PM NSH

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON ADELINE R. STINER, DEFENDANT

BY HANDING TO _____ / _____

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

ADDRESS SERVED _____

'FILED

*03/20/09
MAY 15 2009*

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE FOR ADELINE R. STINER

AT (ADDRESS) _____

*William A. Shaw
Prothonotary/Clerk of Courts*

NOW 5-15-09 AT 8:10 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF NOT FOUND AS TO ADELINE R. STINER

REASON UNABLE TO LOCATE No Contact

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

**SHERIFF'S OFFICE
CLEARFIELD COUNTY
CASE # 105526**

DEAR ADELINE R. STINER

Would you please contact the DEPUTY AT _____ concerning legal papers we have for you

When you call, please give your name and the case # noted above (105526) and the deputy will make arrangements for service.

Thank you for your consideration in this matter.

SHERIFF CHESTER A. HAWKINS

OFFICE HOURS: 8:30 A.M. to 4:00 P.M.
PHONE (814) 765-2641

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File # 22.09261

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

~~COURT OF COMMON PLEAS~~
~~CLEARFIELD COUNTY~~

Plaintiff,

No.: 08-1986-CD

Vs.

CIVIL ACTION
MORTGAGE FORECLOSURE

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

Apr 14, 2009 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William L. Harbert, Esq.
Deputy Prothonotary

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

OCT 16 2008

Attest.

William L. Harbert
Prothonotary/
Clerk of Courts

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

- 1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.**
- 2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.**
- 3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.**

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

Plaintiff,

Vs.

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

No.:

CIVIL ACTION
MORTGAGE FORECLOSURE

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.
Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from	
1/13/08 to 10/15/08	
@ 9.340% per annum	
(\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges.....	\$6.35

Reasonable Attorney's Fees	\$1,250.00
TOTAL as of 10/15/2008	\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. ' 4904, relating to unsworn falsification to authorities.


Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

Exhibit A

EXHIBIT A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File No. 22.09261

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania,**

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

Plaintiff,

No.: 08-1986-CD

Vs.

Ralph J. Stiner,

**Praecipe to Reinstate Complaint in
Mortgage Foreclosure**

and

Adeline R. Stiner,

Defendants.

TO THE PROTHONOTARY:

Kindly reinstate the Complaint in Mortgage Foreclosure for the above captioned matter.

MILSTEAD & ASSOCIATES, LLC


Mary L. Harbert-Bell, Esquire
Attorney ID No. 80763

pd \$7.00 Atty
FILED *reinstated*
M 12:00 pm JUL 02 2009 Complaint
b *Shaw* Atty
William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 105526
NO: 08-1986-CD
SERVICES 4

COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY d/b/a BENEFICIAL MORTGAGE CO. OF PA.
vs.
DEFENDANT: RALPH J. STINER and ADELINE R. STINER

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	MILSTEAD	58705	40.00
SHERIFF HAWKINS	MILSTEAD	58705	60.00

5 FILED
03/18/09
JUL 24 2009

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

So Answers,

Day of _____ 2009



Chester A. Hawkins
Sheriff

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File 22.09261

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

~~COURT OF COMMON PLEAS~~
~~CLEARFIELD COUNTY~~

Plaintiff,

No.: 08-1986-CD

Vs.

CIVIL ACTION
MORTGAGE FORECLOSURE

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

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

OCT 16 2008

Attest.



William A. Harbert
Prothonotary/
Clerk of Courts

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

- 1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.**
- 2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.**
- 3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.**

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,**

Plaintiff,

Vs.

**Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

and

**Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

Defendants.

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

No.:

**CIVIL ACTION
MORTGAGE FORECLOSURE**

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830. Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from	
1/13/08 to 10/15/08	
@ 9.340% per annum	
(\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges.....	\$6.35

Reasonable Attorney's Fees	\$1,250.00
TOTAL as of 10/15/2008	\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

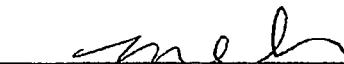
MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.



Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

Exhibit A

EXHIBIT A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File. 22.09261

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

Plaintiff,

No.: 08-1986-CD

Vs.

CIVIL ACTION
MORTGAGE FORECLOSURE

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

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

OCT 16 2008

Attest.



William L. Harbert
Prothonotary/
Clerk of Courts

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.
2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.
3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

Plaintiff,

Vs.

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

No.:

CIVIL ACTION
MORTGAGE FORECLOSURE

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.
Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from 1/13/08 to 10/15/08 @ 9.340% per annum (\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges.....	\$6.35

Reasonable Attorney's Fees	\$1,250.00
TOTAL as of 10/15/2008	\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

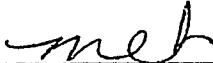
Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. '4904, relating to unsworn falsification to authorities.

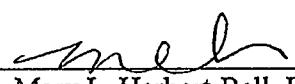

Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

Exhibit A

EXHIBIT A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

COPY

Attorney for Plaintiff
File. 22.09261

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

Plaintiff,

No.: 08-1986-CD

Vs.

CIVIL ACTION
MORTGAGE FORECLOSURE

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

April 14, 2009. Document
Reinstated/Rescued to Sheriff/Attorney
for service.

William L. Harbert
Deputy Prothonotary

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

OCT 16 2008

Attest.

William L. Harbert
Prothonotary/
Clerk of Courts

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

- 1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.**
- 2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.**
- 3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.**

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

Plaintiff,

Vs.

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

No.:

CIVIL ACTION
MORTGAGE FORECLOSURE

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.
Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from	
1/13/08 to 10/15/08	
@ 9.340% per annum	
(\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges.....	\$6.35

Reasonable Attorney's Fees	\$1,250.00
TOTAL as of 10/15/2008	\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire

Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.


Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

Exhibit A

EXHIBIT A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

COPY

Attorney for Plaintiff
File # 22.09261

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

Plaintiff,

No.: 08-1986-CD

Vs.

CIVIL ACTION
MORTGAGE FORECLOSURE

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,

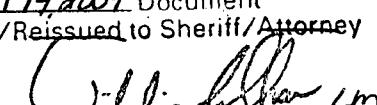
and

Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,

Defendants.

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

April 14, 2009 Document
Reinstated/Reissued to Sheriff/Attorney
for service.


Deputy Prothonotary

OCT 16 2008

Attest.


William G. Harber-Bell
Prothonotary/
Clerk of Courts

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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Lawyers Referral and Information Services
Clearfield County Bar Association
Clearfield County Courthouse
230 E. Market Street
Clearfield, NJ 16830
800-692-7375

Daniel J. Nelson, Court Admin.
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830
814-765-2641 ex 5982

NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT

- 1. This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose.**
- 2. Unless you dispute the validity of this debt, or any portion thereof, within 30 days after receipt of this notice, the debt will be assumed to be valid by our offices.**
- 3. If you notify our offices in writing within 30 days of receipt of this notice that the debt, or any portion thereof, is disputed, our offices will provide you with verification of the debt or copy of the Judgment against you, and a copy of such verification or judgment will be mailed to you by our offices.**

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,**

Plaintiff,

Vs.

**Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

and

**Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,**

Defendants.

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

No.:

**CIVIL ACTION
MORTGAGE FORECLOSURE**

COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff, Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania (the "Plaintiff"), is a corporation registered to conduct business in the Commonwealth of Pennsylvania and having an office and place of business at 636 Grand Regency Boulevard, Brandon, FL 33510.

2. Defendants, Ralph J. Stiner and Adeline R. Stiner, (collectively, the "Defendants"), are adult individuals and are the real owners of the premises hereinafter described.

3. Ralph J. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.
Adeline R. Stiner, Defendant, resides at 1109 Willow Drive, Clearfield, PA 16830.

4. On March 7, 2006, in consideration of a loan in the principal amount of \$74,036.23, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a note (the "Note") with interest thereon at 9.340 percent per annum, payable as to the principal and interest in equal monthly installments of \$671.41 commencing April 13, 2006.

5. To secure the obligations under the Note, the Defendants executed and delivered to Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania a mortgage (the "Mortgage") dated March 7, 2006, recorded on March 13, 2006 in the Department of Records in and for the County of Clearfield under Mortgage Instrument Number 200603785. Pursuant to Pa.R.C.P. 1019 (g) the mortgage is incorporated herein by reference.

6. The Mortgage secures the following real property (the "Mortgaged Premises"): 8777 Gillingham Road, Frenchville, PA 16836. A legal description of the Mortgaged Premises is attached hereto as Exhibit "A" and made a part hereof.

7. The Defendants are in default of their obligations pursuant to the Note and Mortgage because payments of principal and interest due February 13, 2008, and monthly thereafter are due and have not been paid, whereby the whole balance of principal and all interest due thereon have become due and payable forthwith together with late charges, escrow deficit (if any) and costs of collection including title search fees and reasonable attorney's fees.

8. The following amounts are due on the Mortgage and Note:

Balance of Principal	\$71,620.90
Accrued but Unpaid Interest from	
1/13/08 to 10/15/08	
@ 9.340% per annum	
(\$18.33 per diem)	\$5,077.41
Accrued Late Charges	\$302.13
Title Search Fees	\$350.00
Deferred Late Charges	\$6.35

Reasonable Attorney's Fees	\$1,250.00
TOTAL as of 10/15/2008	\$78,606.79

Plus, the following amounts accrued after October 15, 2008:

Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

Late Charges of \$33.57 per month.

9. Plaintiff has complied fully with Act No. 91 (35 P.S.'1680.401(c) of the 1983 Session of the General Assembly ("Act 91") of the Commonwealth of Pennsylvania, by mailing to the Defendants at 8777 Gillingham Road, Frenchville, PA 16836 as well as to address of residences as listed in paragraph 3 of this document on September 8, 2008, the notice pursuant to § 403-C of Act 91, and the applicable time periods therein have expired.

WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per day, (b) late charges of \$33.57 per month, (c) plus interest at the legal rate allowed on judgments after the date of judgment, (d) additional attorney's fees (if any) hereafter incurred, (e) and costs of suit.

MILSTEAD & ASSOCIATES, LLC



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

VERIFICATION

I, Mary L. Harbert-Bell, hereby certify that I am an Attorney for Plaintiff and am authorized to make this verification on Plaintiff's behalf. I verify that the facts and statements set forth in the forgoing Complaint in Mortgage Foreclosure are true and correct to the best of my knowledge, information and belief. This verification is made subject to the penalties of 18 Pa. C.S. ' 4904, relating to unsworn falsification to authorities.



Name: Mary L. Harbert-Bell, Esquire
Title: Attorney

Exhibit A

EXHIBIT A

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Control No. 1140-49572 Map No. 114-006-000-00082.

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff
File No. 22.09261

FILED NOCC
M 12:50 PM
JUL 30 2009
William A. Shaw
Prothonotary/Clerk of Courts

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania,**

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

Plaintiff,

No.: 08-1986-CD

Vs.

**Praecipe to Reinstate Complaint in
Mortgage Foreclosure**

Ralph J. Stiner,

and

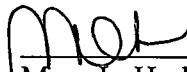
Adeline R. Stiner,

Defendants.

AFFIDAVIT OF SERVICE

I, Mary L. Harbert-Bell, Esquire, of full age, being duly sworn according to the law, upon my oath, depose and say:

A copy of the Complaint in Mortgage Foreclosure was served upon Rick Lhota, Esquire, Attorney for Defendants, Ralph J. Stiner and Adeline R. Stiner on July 27, 2009. A copy of the Acceptance of Service Form is attached hereto and made part hereof as Exhibit "A."



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ATTORNEY ID NO.: 80763
Woodland Falls Corporate Park
220 Lake Drive East, Ste 301
Cherry Hill, NJ 08002
(856) 482-1400
Attorneys for Plaintiff
File No. 22.09261

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania**

Plaintiff,
Vs.

**Ralph J. Stiner
Adeline R. Stiner
Defendants.**

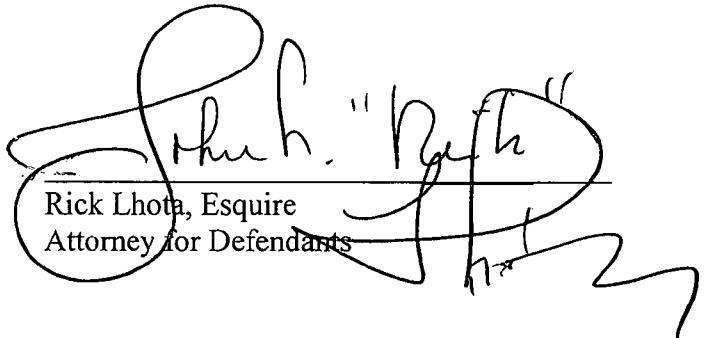
**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

No.: 08-1986-CD

ACCEPTANCE OF SERVICE

I, Rick Lhota, Esquire, Attorney for Defendants, Ralph J. Stiner and Adeline R. Stiner, being authorized to do so, hereby accept service of the Complaint in Mortgage Foreclosure in the above captioned matter on behalf of the Defendants, Ralph J. Stiner and Adeline R. Stiner, on the date stated herein.

Date: 7/24/09


Rick Lhota, Esquire
Attorney for Defendants

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

5 **FILED** Atty pd. \$20.00
M 12/28/09
AUG 25 2009 ICC & Notice
William A. Shaw
Prothonotary/Clerk of Courts
to Defs. & Atty Chota
(64)

Attorney for Plaintiff

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
636 Grand Regency Boulevard
Brandon, FL 33510,
Plaintiff,

Vs.

Ralph J. Stiner
1109 Willow Drive
Clearfield, PA 16830,
and
Adeline R. Stiner
1109 Willow Drive
Clearfield, PA 16830,
Defendants.

COURT OF COMMON PLEAS
CLEARFIELD COUNTY

No.: 08-1986-CD

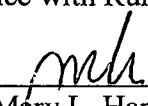
**PRAECIPE FOR JUDGMENT, *IN REM*, FOR FAILURE TO
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE PROTHONOTARY:

Kindly enter Judgment, *in rem*, in favor of Plaintiff and against Ralph J. Stiner and Adeline R. Stiner, Defendants, for failure to file an Answer on Plaintiff's Complaint within 20 days from service thereof and for Foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$78,606.79
Interest 10/16/08 through 08/24/09	5,737.29
Late Charges	335.70
Additional Corporate Advance	3,078.93
Additional Escrow Advance	1,760.00
TOTAL	\$89,518.71

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


Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: 8/25/09


PROTHONOTARY

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400
Attorney for Plaintiff

Our file number: 22.09261

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania,**

Plaintiff,

Vs.

Ralph J. Stiner

and

Adeline R. Stiner,

Defendants.

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

No.: 08-1986-CD

TO:	Ralph J. Stiner 1109 Willow Drive, Clearfield, PA 16830	Adeline R. Stiner 1109 Willow Drive, Clearfield, PA 16830	John "Rick" Lhota, Esq. 110 N. Second Street, Clearfield, PA 16830 Attorney for Defendants
------------	---	---	---

DATE OF NOTICE: August 14, 2009

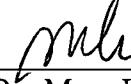
THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT 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 claims set forth against you. Unless you act within ten (10) days from the date of this notice, a judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this 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.

LAWYERS REFERRAL AND INFORMATION SERVICES
CLEARFIELD COUNTY BAR ASSOCIATION
CLEARFIELD COUNTY COURTHOUSE
230 E. MARKET STREET
CLEARFIELD, PA 16830
800-692-7375

MILSTEAD & ASSOCIATES, LLC


By: Mary L. Harbert-Bell, Esquire
ID No. 80763
Attorney for Plaintiff

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400

Attorney for Plaintiff

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania,**

Plaintiff,

Vs.

Ralph J. Stiner,

and

Adeline R. Stiner,

Defendants.

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

No.: 08-1986-CD

VERIFICATION OF NON-MILITARY SERVICE

Mary L. Harbert-Bell, Esquire, hereby verifies that she is attorney for the Plaintiff in the above-captioned matter, and that on information and belief, she has knowledge of the following facts, to wit:

1. that the defendants are not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldier' and Sailors' Civil Relief Act of Congress of 1940, as amended,
2. defendant, Ralph J. Stiner, is over 18 years of age and resides at 1109 Willow Drive, Clearfield, PA 16830,
3. defendant, Adeline R. Stiner, is over 18 years of age and resides at 1109 Willow Drive, Clearfield, PA 16830.



Mary L. Harbert-Bell, Esquire

OFFICE OF THE PROTHONOTARY
COURT OF COMMON PLEAS OF CLEARFIELD COUNTY

COPY

Prothonotary

To: Ralph J. Stiner
Adeline R. Stiner

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania,**

Plaintiff,

Vs.

Ralph J. Stiner,

and

Adeline R. Stiner,

Defendants.

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

No.: 08-1986-CD

NOTICE PURSUANT TO RULE 236

Pursuant to Rule 236 of the Supreme Court of Pennsylvania, you are hereby notified that a Judgment has been entered against you in the above proceeding as indicated below.

Prothonotary

Walter L. Stiner 8/25/09

MORTGAGE FORECLOSURE JUDGMENT BY DEFAULT

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE, PLEASE CALL:

MARY L. HARBERT-BELL, ESQ. #80763
MILSTEAD & ASSOCIATES, LLC
856-482-1400

Notice Pursuant To Fair Debt Collection Practices Act
This is an attempt to collect a debt and any information obtained will be used for that purpose.

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

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania,**

Plaintiff,

Vs.

Ralph J. Stiner

and

Adeline R. Stiner,

Defendants.

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

No.: 08-1986-CD

To the Prothonotary:

Issue Writ of Execution in the above matter:

AMOUNT DUE	\$89,518.71
INTEREST	
From 08/25/2009 to date of sale at	\$
\$14.72 per diem	
Attorney's Fees	
(Costs to be added)	\$
TOTAL DUE	\$

149.00

Prothonotary costs

Date: September 2, 2009

M.L.B.

Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400
Attorney ID No.: 80763

Note: Please attach description of Property.

{00375916}

FILED Atty pd.
m 10/7/09 20.00
SEP 03 2009
S William A. Shaw
Prothonotary/Clerk of Courts
1000 Lewontz
tashff
68
68

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

**Being known as 8777 Gillingham Road, Frenchville, PA 16836
Tax Parcel Number: 114-006-000-00082**

SEIZED, taken in execution to be sold as the property of Ralph J. Stiner and Adeline R. Stiner, at the suit of Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania, Judgment No. 08-1986-CD.

COPY

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

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania,

Plaintiff,

Vs.

Ralph J. Stiner

and

Adeline R. Stiner,

Defendants.

IN THE COURT OF COMMON PLEAS
OF DELAWARE COUNTY,
PENNSYLVANIA

No.: 08-1986-CD

To the Prothonotary:

Issue Writ of Execution in the above matter:

AMOUNT DUE	\$89,518.71
INTEREST	
From 08/25/2009 to date of	\$
sale	
at \$14.72 per diem	
(Costs to be added)	\$
TOTAL DUE	\$
	149.00
	Prothonotary costs

Date: September 2, 2009

M.L.B.
Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400
Attorney ID No.: 80763

Note: Please attach description of Property.

{00375916}

Willie L. Bell 9/3/09
BTH

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

**Being known as 8777 Gillingham Road, Frenchville, PA 16836
Tax Parcel Number: 114-006-000-00082**

SEIZED, taken in execution to be sold as the property of Ralph J. Stiner and Adeline R. Stiner, at the suit of Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania, Judgment No. 08-1986-CD.

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400
Attorney for Plaintiff

FILED
M 11/25/09 NO CC
SEP 03 2009

William A. Shaw
Prothonotary/Clerk of Courts

**Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania,**

Plaintiff,

Vs.

Ralph J. Stiner

and

Adeline R. Stiner,

Defendants.

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

No.: 08-1986-CD

**AFFIDAVIT OF SERVICE
PURSUANT TO RULE 3129.1**

STATE OF PENNSYLVANIA
COUNTY OF CLEARFIELD

**Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of
Pennsylvania,** Plaintiff in the above entitled cause of action, sets forth as of the date the praecipe
for writ of execution was filed the following information concerning the real property located at
8777 Gillingham Road, Frenchville, PA 16836:

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

Ralph J. Stiner	Adeline R. Stiner
1109 Willow Drive	1109 Willow Drive
Clearfield, PA 16830	Clearfield, PA 16830

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

Same as above

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

Discover Bank

{00375916}

c/o Paul V. Ressler, Esq.
21 Yost Boulevard, Ste. 301
Pittsburgh, PA 15221

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

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania
(Plaintiff herein)
636 Grand Regency Boulevard
Brandon, FL 33510

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

None Known

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:

None Known

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

Tenant/Occupant
8777 Gillingham Road
Frenchville, PA 16836

Department of Domestic Relations
Clearfield County Courthouse
230 E. Market Street
Clearfield, PA 16830

Commonwealth of Pennsylvania
Department of Welfare
P.O. Box 2675
Harrisburg, PA 17105

I verify that the statements made in the 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. Section 4904 relating to unsworn falsification to authorities.



Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff

Date: September 2, 2009

{00375916}

MILSTEAD & ASSOCIATES, LLC
BY: Mary L. Harbert-Bell, Esquire
ID No. 80763
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400
Attorney for Plaintiff

FILED

NOV 06 2009
m/10/2010
William A. Shaw
Prothonotary/Clerk of Courts
I CERT + TO
ATT

**Beneficial Consumer Discount Company D/B/A
Beneficial Mortgage Co of Pennsylvania,**

**COURT OF COMMON PLEAS
CLEARFIELD COUNTY**

Plaintiff,

Vs.

Ralph J. Stiner

and

Adeline R. Stiner

Defendants.

COMMONWEALTH OF PENNSYLVANIA

SS:

COUNTY OF CLEARFIELD

I, Mary L. Harbert-Bell, Esquire, being duly sworn according to law upon my oath, depose and say,

1. On October 26, 2009, a copy of the Notice of Sheriff's Sale of Real Property was served on the defendant by certified mail, returned receipt requested. Copies of the signed certified cards are attached hereto and made a part hereof as Exhibit "A".
2. On October 29, 2009, a notice of Sheriff's Sale was served upon lien holders of record and interested parties by ordinary mail. A copy of the certificate of mailing is attached hereto and made a part hereof as Exhibit "B".


Mary L. Harbert-Bell, Esquire
Attorney ID No. 80763
Milstead and Associates, LLC

Dated: November 2, 2009

{00391918}

NAME AND ADDRESS OF SENDER
 MILSTEAD & ASSOCIATES, LLC
 Woodland Falls Corporate Park
 220 Lake Drive East, Suite 301
 Cherry Hill, NJ 08002

INDICATE TYPE OF MAIL			CHECK APPROPRIATE BLOCK FOR			POSTMARK AND DATE OF RECEIPT							
<input checked="" type="checkbox"/> Certificate Mailing <input type="checkbox"/> Insured <input type="checkbox"/> COD <input type="checkbox"/> Certified Mail			<input type="checkbox"/> Registered Mail: <input type="checkbox"/> With Postal Insurance <input type="checkbox"/> Without Postal Insurance			Affix stamp here if issued as certificate of mailing, or for additional copies of this bill.							
Line	Number of Article	Name of Addressee, Street, and Post-Office Address	Postage	Fee	Handling Charge	Act. Value (If Regis.)	Insured Value	Due Sender If C.O.D.	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Rick Lhota, Esq. 110 North 2 nd Street Clearfield, PA 16830											
2													
3													
4													
5													
6													
7													
Total Number of Pieces Listed by Sender			POSTMASTER PER (Name of receiving employee) RICK SHADDEAU			The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$50,000 per occurrence. The maximum indemnity payable on Express Mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for Registered Mail, \$500 for COD and \$500 for Insured Mail. Special handling charges apply only to Third- and Fourth-Class parcels. Special delivery service also includes special handling service.			OCT 26 2009 OCT 26 2009 22.09261				
FOR REGISTERED, INSURED, COD, CERTIFIED, AND EXPRESS MAIL USPS - 0803													

PS FORM 3877
 22.09261

NAME AND ADDRESS OF SENDER			INDICATE TYPE OF MAIL			CHECK APPROPRIATE BLOCK FOR			POSTMARK AND DATE OF RECEIPT		
MILSTEAD & ASSOCIATES, LLC Woodland Falls Corporate Park 220 Lake Drive East, Suite 301 Cherry Hill, NJ 08002			<input checked="" type="checkbox"/> Certificate Mailing <input type="checkbox"/> Insured <input type="checkbox"/> COD <input type="checkbox"/> Certified Mail			<input type="checkbox"/> With Postal Insurance <input type="checkbox"/> Without Postal Insurance			Registered Mail: <input type="checkbox"/> _____		
Line	Number of Article	Name of Addressee, Street, and Post-Office Address	Postage	Fee	Handling Charge	Act. Value (If Regis.)	Insured Value	Due Sender If C.O.D.	R.R. Fee	S.D. Fee	S.H. Fee
1	Tenant/Occupant	8777 Gillingham Road Frenchville, PA 16836									
2	Department of Domestic Relations 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	Discover Bank c/o Paul V. Ressler, Esq. 21 Yost Boulevard, Ste. 301 Pittsburgh, PA 15221										
5											
6											
7											
Total Number of Pieces Listed by Sender			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 nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$50,000 per occurrence. The maximum indemnity payable on Express Mail merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for Registered Mail, \$500 for COD and \$500 for Insured Mail. Special handling charges apply only to Third- and Fourth-Class parcels. Special delivery service also includes special handling service.			_____		
PS FORM 3877 22.09261			FOR REGISTERED, INSURED, C.O.D., CERTIFIED, AND EXPRESS MAIL			UNITED STATES POSTAGE					

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 21033
NO: 08-1986-CD

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE CO OF PENNSYLVANIA

VS.

DEFENDANT: RALPH J. STINER AND ADELINE R. STINER

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 9/3/2009

LEVY TAKEN 10/5/2009 @ 2:57 PM

POSTED 10/5/2009 @ 2:57 PM

SALE HELD 12/4/2009

SOLD TO BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE CO OF PENNSYLVANIA

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 1/12/2010

DATE DEED FILED 1/12/2010

PROPERTY ADDRESS 8777 GILLINGHAM ROAD FRENCHVILLE , PA 16836

SERVICES

10/26/2009 @ 3:00 PM SERVED RALPH J. STINER

SERVED RALPH J. STINER, DEFENDANT, BY HANDING TO TERRI BUMBARGER, SECRETARY FOR JOHN LHOTA, ESQ. ATTORNEY FOR THE DEFENDANT AT 110 NORTH SECOND STREET, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA

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.

10/26/2009 @ 3:00 PM SERVED ADELINE R. STINER

SERVED ADELINE R. STINER, DEFENDANT, BY HANDING TO TERRI BUMBARGER, SECRETARY FOR JOHN LHOTA, ESQ. ATTORNEY FOR THE DEFENDANT AT 110 NORTH SECOND STREET, CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA

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.

FILED

03/10/2010
JAN 12 2010

William A. Shaw
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 21033

NO: 08-1986-CD

PLAINTIFF: BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE CO OF PENNSYLVANIA

vs.

DEFENDANT: RALPH J. STINER AND ADELINE R. STINER

Execution REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS \$220.88

SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This

So Answers,

____ Day of _____ 2010


By Cynthia Butcher, Deputy Sheriff
Chester A. Hawkins
Sheriff

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

Beneficial Consumer Discount Company
D/B/A Beneficial Mortgage Co of
Pennsylvania,

Plaintiff,

Vs.

Ralph J. Stiner

and

Adeline R. Stiner,

Defendants.

IN THE COURT OF COMMON PLEAS
OF DELAWARE COUNTY,
PENNSYLVANIA

No.: 08-1986-CD

To the Prothonotary:

Issue Writ of Execution in the above matter:

AMOUNT DUE	\$89,518.71
INTEREST	
From 08/25/2009 to date of	\$
sale	
at \$14.72 per diem	
(Costs to be added)	\$
TOTAL DUE	\$
	149.00
	Prothonotary costs

Date: September 2, 2009

M.L.B.
Mary L. Harbert-Bell, Esquire
Attorney for Plaintiff
220 Lake Drive East, Suite 301
Cherry Hill, NJ 08002
(856) 482-1400
Attorney ID No.: 80763

Note: Please attach description of Property.

Received this writ this 3rd day
of September A.D. 2009
At 2:00 A.M./P.M.

Willie Shan 9/3/09
BD

{00375916}

Chester A. Hawkins
Sheriff *Cynthia Sutton-Aufdenhau*

ALL that certain piece or parcel of land situated in the Township of Girard, County of Clearfield, Commonwealth of Pennsylvania, bounded by and described as follows:

BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South 21° 14' East a distance of 631.5 feet from a point in the centerline of the aforementioned Township Road and on line of Paul G. Smith; thence along line of other lands of Shannon Land & Mining Company the following three (3) courses and distances: 1) North 52° 12' East, passing over an iron pin marker set on line at a distance of 5.00 feet, a total distance of 345.05 feet to an iron pin corner set; thence 2) South 53° 38' East a distance of 409.44 feet to an iron pin corner set; thence 3) South 52° 15' West, passing over an iron pin marker set on line at a distance of 534.92 feet, a total distance of 539.92 feet to a point on the Eastern right-of-way line of the aforementioned Township Road; thence along the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, the following four (4) courses and distances: 1) by a curve to the right, having a radius of 225.00 feet, an arc distance of 74.00 feet, the chord of which is North 31° 34' West a distance of 73.66 feet, to a point; thence 2) North 22° 09' West a distance of 174.97 feet to a point; thence 3) by a curve to the left, having a radius of 838.00 feet, an arc distance of 135.97 feet, the chord of which is North 26° 48' West a distance of 135.82 feet, to a point; thence 4) North 31° 27' West a distance of 18.54 feet to a point; the place of beginning.

Being known as 8777 Gillingham Road, Frenchville, PA 16836

Tax Parcel Number: 114-006-000-00082

SEIZED, taken in execution to be sold as the property of Ralph J. Stiner and Adeline R. Stiner, at the suit of Beneficial Consumer Discount Company D/B/A Beneficial Mortgage Co of Pennsylvania, Judgment No. 08-1986-CD.

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME RALPH J. STINER

NO. 08-1986-CD

NOW, January 12, 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 December 04, 2009, I exposed the within described real estate of Ralph J. Stiner And Adeline R. Stiner to public venue or outcry at which time and place I sold the same to BENEFICIAL CONSUMER DISCOUNT COMPANY D/B/A BENEFICIAL MORTGAGE CO OF PENNSYLVANIA he/she being the highest bidder, for the sum of \$1.00 plus costs and made the following appropriations, viz:

SHERIFF COSTS:

RDR	15.00
SERVICE	15.00
MILEAGE	2.00
LEVY	15.00
MILEAGE	17.60
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	5.28
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	10.00
TOTAL SHERIFF COSTS	\$230.88

DEED COSTS:

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	52.50
TRANSFER TAX 2%	0.00
TOTAL DEED COSTS	\$52.50

PLAINTIFF COSTS, DEBT AND INTEREST:

DEBT-AMOUNT DUE	89,518.71
INTEREST @ 14.7200 %	1,486.72
FROM 08/25/2009 TO 12/04/2009	
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	
TOTAL DEBT AND INTEREST	\$91,045.43
COSTS:	
ADVERTISING	284.50
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	52.50
SHERIFF COSTS	230.88
LEGAL JOURNAL COSTS	189.00
PROTHONOTARY	149.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	
TOTAL COSTS	\$1,050.88

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