

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

Apr. 14 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.

**OCT 16 2008**

Attest.

William A. Shaw  
Prothonotary/  
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original missing

[illegible]

## **NOTICE**

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**NOTICE PURSUANT TO FAIR DEBT COLLECTION PRACTICES ACT**  
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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.
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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.

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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



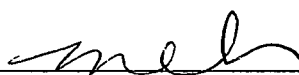
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Mary L. Harbert-Bell, Esquire  
Attorney for Plaintiff



**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  $21^{\circ} 14'$  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  $52^{\circ} 12'$  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  $53^{\circ} 38'$  East a distance of 409.44 feet to an iron pin corner set; thence 3) South  $52^{\circ} 15'$  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  $31^{\circ} 34'$  West a distance of 73.66 feet, to a point; thence 2) North  $22^{\circ} 09'$  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  $26^{\circ} 48'$  West a distance of 135.82 feet, to a point; thence 4) North  $31^{\circ} 27'$  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: /

**FILED**  
01:50LM  
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

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DOCKET # 104840  
NO: 08-1986-CD  
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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

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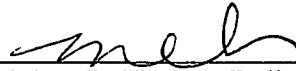


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Title: Attorney

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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

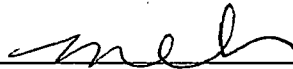


---

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  $21^{\circ} 14'$  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  $52^{\circ} 12'$  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  $53^{\circ} 38'$  East a distance of 409.44 feet to an iron pin corner set; thence 3) South  $52^{\circ} 15'$  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  $31^{\circ} 34'$  West a distance of 73.66 feet, to a point; thence 2) North  $22^{\circ} 09'$  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  $26^{\circ} 48'$  West a distance of 135.82 feet, to a point; thence 4) North  $31^{\circ} 27'$  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,**

**Plaintiff,**

**Vs.**

**Ralph J. Stiner,**

**and**

**Adeline R. Stiner,**

**Defendants.**

**COURT OF COMMON PLEAS  
CLEARFIELD COUNTY**


**No.: 08-1986-CD**

**Praecipe 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

5 **FILED** pd \$7.00 Att  
m/12:15Lm ICC to Att  
APR 14 2009 6 reinstated Complaints  
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

SERVICE # 1 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:

8777 GILLINGHAM ROAD

FRENCHVILLE, PA 16836

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

ATTEMPTS

**FILED**

0/8:30 AM  
MAY 18 2009

William A. Shaw

Prothonotary/Clerk of Courts

OCCUPIED

**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 Answered: 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

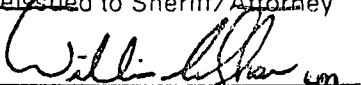
Ralph J. Stiner  
1109 Willow Drive  
Clearfield, PA 16830,

and

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

Defendants.

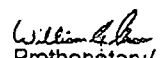
Apr. 14 2009 Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

  
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.

  
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);

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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.

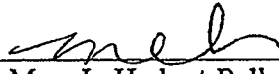
WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per 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

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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 # 2 OF 4

RALPH J. STINER and ADELINE R. STINER

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 05/14/2009

HEARING:

PAGE: 105526

DEFENDANT:

ADELINE R. 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

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 \_\_\_\_\_

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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

FILED

0/8:30am  
MAY 18 2009

William A. Shaw  
Prothonotary/Clerk of Courts

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.

William A. Shaw  
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. Shaw  
Prothonotary/  
Clerk of Courts

## **NOTICE**

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800-692-7375

Daniel J. Nelson, Court Admin.  
Clearfield County Courthouse  
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814-765-2641 ex 5982

\*\*\*\*\*  
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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

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Brandon, FL 33510,**

**Plaintiff,**

**Vs.**

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Clearfield, PA 16830,**

**and**

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Clearfield, PA 16830,**

**Defendants.**

**COURT OF COMMON PLEAS  
CLEARFIELD COUNTY**

**No.:**

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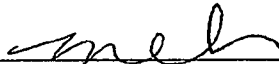
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MILSTEAD & ASSOCIATES, LLC

  
\_\_\_\_\_  
Mary L. Harbert-Bell, Esquire  
Attorney for Plaintiff

**VERIFICATION**

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



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# 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  $21^{\circ} 14'$  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  $52^{\circ} 12'$  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  $53^{\circ} 38'$  East a distance of 409.44 feet to an iron pin corner set; thence 3) South  $52^{\circ} 15'$  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  $31^{\circ} 34'$  West a distance of 73.66 feet, to a point; thence 2) North  $22^{\circ} 09'$  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  $26^{\circ} 48'$  West a distance of 135.82 feet, to a point; thence 4) North  $31^{\circ} 27'$  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

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

5-5-09-10:19 AM N/A 1109 Willow Dr. 5/13/09-8:57 AM N/A  
5-9-09 11:01 AM N/A

**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) \_\_\_\_\_

William A. Shaw  
Prothonotary/Clerk of Courts

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

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

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.**

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

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. Brown  
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.

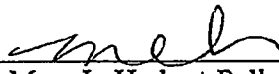
WHEREFORE, Plaintiff demands an in rem judgment against the Defendants for foreclosure and sale of the Mortgaged Premises in the amount due as set forth in paragraph 8, namely, \$78,606.79, plus the following amounts accruing after October 15, 2008, to the date of judgment: (a) interest of \$18.33 per 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  $21^{\circ} 14'$  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  $52^{\circ} 12'$  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  $53^{\circ} 38'$  East a distance of 409.44 feet to an iron pin corner set; thence 3) South  $52^{\circ} 15'$  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  $31^{\circ} 34'$  West a distance of 73.66 feet, to a point; thence 2) North  $22^{\circ} 09'$  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  $26^{\circ} 48'$  West a distance of 135.82 feet, to a point; thence 4) North  $31^{\circ} 27'$  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 # 4 OF 4

RALPH J. STINER and ADELINE R. STINER

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 05/14/2009

HEARING:

PAGE: 105526

DEFENDANT:

ADELINE R. STINER

ADDRESS:

1009 WILLOW DRIVE  
CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

5-5-09 - 10:19 AM N/S 1109 Willow Drive.

5-9-09 - 11:04 AM N/S

NO SUCH ADDRESS

4/27/09 per atty try:

1109 Willow Drive  
Clearfield.

**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**

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

03:20 PM  
MAY 15 2009

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:

Deputy Signature

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/Released to Sheriff/Attorney  
for service.

*William L. Shaw*  
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. Shaw*  
Prothonotary/  
Clerk of Courts

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Daniel J. Nelson, Court Admin.  
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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**

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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:

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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

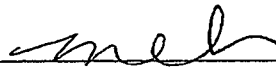


---

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:

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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  
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**Plaintiff,**

**Vs.**

**Ralph J. Stiner,**

**and**

**Adeline R. Stiner,**

**Defendants.**

**COURT OF COMMON PLEAS  
CLEARFIELD COUNTY**


**No.: 08-1986-CD**

**Praecipe 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

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

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

<sup>5</sup>FILED

03:18 PM  
JUL 24 2009

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

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

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,

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

CIVIL ACTION  
MORTGAGE FORECLOSURE

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. Shaw*  
Prothonotary/  
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**No.:**

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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.  
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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
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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.

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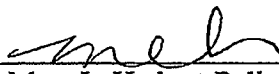


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**VERIFICATION**

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.

  
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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  $21^{\circ} 14'$  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  $52^{\circ} 12'$  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  $53^{\circ} 38'$  East a distance of 409.44 feet to an iron pin corner set; thence 3) South  $52^{\circ} 15'$  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  $31^{\circ} 34'$  West a distance of 73.66 feet, to a point; thence 2) North  $22^{\circ} 09'$  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  $26^{\circ} 48'$  West a distance of 135.82 feet, to a point; thence 4) North  $31^{\circ} 27'$  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

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OCT 16 2008

Attest.

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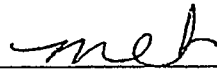
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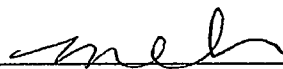


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No.: 08-1986-CD

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

Deputy Prothonotary

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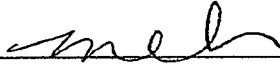


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BEGINNING at a point on the Eastern right-of-way line of Township Road No. T-895, Congress Hill Road, and on line of other lands of Shannon Land & Mining Company, grantor herein, of which this is a part, said point being South  $21^{\circ} 14'$  East 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  $52^{\circ} 12'$  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  $53^{\circ} 38'$  East a distance of 409.44 feet to an iron pin corner set; thence 3) South  $52^{\circ} 15'$  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  $31^{\circ} 34'$  West a distance of 73.66 feet, to a point; thence 2) North  $22^{\circ} 09'$  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  $26^{\circ} 48'$  West a distance of 135.82 feet, to a point; thence 4) North  $31^{\circ} 27'$  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.**

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

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. Shaw  
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:

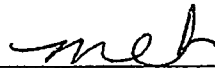
Interest at the Rate of 9.340 per cent per annum (\$18.33 per diem);

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

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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

**FILED** *no cc*  
m/12:5030  
JUL 30 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

Attorney for Plaintiff  
File No. 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**

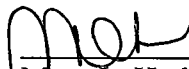
**No.: 08-1986-CD**

**Praecipe to Reinstate Complaint in  
Mortgage Foreclosure**

**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.**

**COURT OF COMMON PLEAS**  
**CLEARFIELD COUNTY**

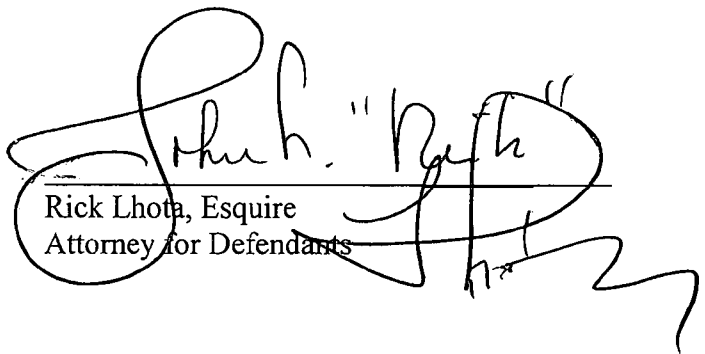
**No.: 08-1986-CD**

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

**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  
m1228764  
AUG 25 2009 ICC Notice  
to Defs. & Atty Chota  
William A. Shaw  
Prothonotary/Clerk of Courts  
(6)

Attorney for Plaintiff

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

**COURT OF COMMON PLEAS  
CLEARFIELD COUNTY**

**No.: 08-1986-CD**

**Vs.**

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


**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
<b>TOTAL</b>	<b>\$89,518.71</b>

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

{00372495}

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  
CLEARFIED 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

*Willie L. Stiner* 8/25/09  
BH

**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

  
\_\_\_\_\_  
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**

SEP 03 2009

William A. Shaw  
Prothonotary/Clerk of Courts

Atty pd.  
20.00  
10006 writs  
705 hff  
(64)

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

  
\_\_\_\_\_  
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.

 9/3/09  
BTH

{00375916}

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:

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**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**

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  
1109 Willow Drive  
Clearfield, PA 16830

Adeline R. Stiner  
1109 Willow Drive  
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.



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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

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 PURSUANT TO  
Pa.R.C.P. 3129.2**

**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

☒ Certificate Mailing  
☐ Insured  
☐ COD  
☐ Certified Mail

## CHECK APPROPRIATE BLOCK FOR


Registered Mail:

☐ With Postal Insurance  
☐ Without Postal Insurance

## POSTMARK AND DATE OF RECEIPT

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 <sup>nd</sup> Street Clearfield, PA 16830											
2													
3													
4													
5													
6													
7													
Total Number of Pieces Listed by Sender													



UNITED STATES POSTAGE  
02 1P  
0003126196 \$ 001.150  
OCT 26 2009  
MAILED FROM ZIP CODE 08002

POSTMASTER, PER  
(Name of receiving employee)

MAPLE SHADE NJ  
OCT 26 2009  
USPS - 08052

MAPLE SHADE NJ  
OCT 26 2009  
USPS - 08060

FOR REGISTERED, INSURED/C.O.D., CERTIFIED, AND EXPRESS MAIL

PS FORM 3877

22.09261

{00179059}

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			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
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			4			POSTMASTER, PER (Name of receiving employee)		<p>The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for 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 services.</p>						



PS FORM 3877 22.09261

{00179059}

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**  
9/3/10  
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

\_\_\_\_\_ Day of \_\_\_\_\_ 2010

\_\_\_\_\_

So Answers,

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**

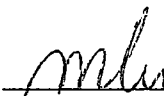
To the Prothonotary:

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

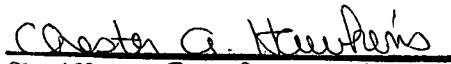
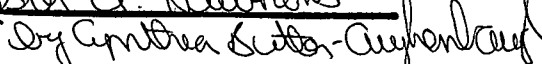
  
\_\_\_\_\_  
Mary L. Harbert-Bell, Esquire  
Attorney for Plaintiff  
220 Lake Drive East, Suite 301  
Cherry Hill, NJ 08002  
(856) 482-1400  
Attorney ID No.: 80763

Note: Please attach description of Property.

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

 9/3/09  
BD

{00375916}

  
\_\_\_\_\_  
Sheriff 

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  $21^{\circ} 14'$  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  $52^{\circ} 12'$  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  $53^{\circ} 38'$  East a distance of 409.44 feet to an iron pin corner set; thence 3) South  $52^{\circ} 15'$  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  $31^{\circ} 34'$  West a distance of 73.66 feet, to a point; thence 2) North  $22^{\circ} 09'$  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  $26^{\circ} 48'$  West a distance of 135.82 feet, to a point; thence 4) North  $31^{\circ} 27'$  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
<b>TOTAL SHERIFF COSTS</b>	<b>\$230.88</b>

**DEED COSTS:**

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

**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	

<b>TOTAL DEBT AND INTEREST</b>	<b>\$91,045.43</b>
--------------------------------	--------------------

**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	

<b>TOTAL COSTS</b>	<b>\$1,050.88</b>
--------------------	-------------------

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

CHESTER A. HAWKINS, Sheriff