

08-2046-CD

Brown Bark II vs Robert Phillips al

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff
v.

Robert F. Phillips
Michelle E. Phillips
912 Clara Street
Houtzdale, PA 16651
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

NO. 2008-2046-CD

FILED
OCT 24 2008
m/10:53 am
pd \$95.00 Atty
acc Shff
WJM

William A. Shaw

COMPLAINT IN MORTGAGE FORECLOSURE Prothonotary/Clerk of Courts

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERRAL SERVICE

David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

December 9, 2008 Document
Reinstated/Reissued to Sheriff/Attorney
for service.

William A. Shaw
Deputy Prothonotary

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: The Bank of New York Trust Company, N.A. as successor to JPMorgan Chase Bank, N.A. successor by merger to Bank One National Association as Trustee, Residential Funding Company, LLC f/k/a Residential Funding Corporation, Attorney in fact

Assignee: Brown Bark II, L.P.

Recording Date: 12/3/07 Instrument No: 200719812

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 912 Clara Street

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Houtzdale

COUNTY: Clearfield

DATE EXECUTED: 3/18/99

DATE RECORDED: 3/24/99 INSTRUMENT NO: 199904436

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by

said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

- (a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated below;
- (b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 9/15/08:

Principal of debt due	\$28,262.03
Unpaid Interest at 12.135% from 1/15/04 to 9/15/08 (the per diem interest accruing on this debt is \$9.40 and that sum should be added each day after 9/15/08)	15,718.92
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$15.05 should be added in accordance with the terms of the note each month after 9/15/08)	181.60
BPO	100.00
Attorneys Fees (anticipated and actual to 5% of principal)	<u>1,413.10</u>
TOTAL	\$46,280.65

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. Notice of Intention to Foreclose under Act 6 of 1974 of

the Commonwealth of Pennsylvania has been sent to each Defendant, certified mail, in accordance with the requirements of that act, and copy(s) are attached hereto as Exhibit "A" and made part hereof.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$46,280.65 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.

UDREN LAW OFFICES, P.C.

BY Chandra Arkema

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

LOUIS A. SIMONI, ESQUIRE

ALL THAT CERTAIN PIECE, PARCEL OR LOT OF GROUND SITUATE IN THE BOROUGH OF HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BOUNDED ON THE SOUTH BY CLARA STREET AND RUNNING WEST ALONG CLARA STREET FIFTY (50') FEET TO A POST ON LINE OF LOT NO. 611; THENCE NORTH ALONG THE LINE OF SAID LOT NO. 611, ONE HUNDRED FIFTY (150') FEET TO A POST ON BEAR ALLEY; THENCE EAST ALONG THE LINE OF BEAR AVENUE, FIFTY (50') FEET TO A POST ON LINE ALLEY; AND THENCE SOUTH ALONG THE LINE OF SAID ALLEY, ONE HUNDRED FIFTY (150') FEET TO A POST ON CLARE STREET, THE PLACE OF BEGINNING, AND KNOWN AS LOT NO. 609 IN THE GENERAL PLAN OF THE BOROUGH OF HOUTZDALE. HAVING THEREON ERECTED A ONE STORY, FRAME DWELLING HOUSE, BUNGALOW TYPE, AND OTHER OUT BUILDINGS. BEING FURTHER IDENTIFIED BY CLEARFIELD COUNTY MAP ASSESSMENT NUMBER 10-M14-397-00013.

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
SUITE 200

CHERRY HILL, NEW JERSEY 08003-3620
856. 669. 5400
FAX: 856. 669. 5399

Pennsylvania Office
(215) 568-9500

MARK J. UDREN*
STUART WINNEG**
LORRAINE DOYLE**
ALAN M. MINATO***
CHANDRA M. ARKEMA***
***ADMITTED NJ, PA, FL**
****ADMITTED PA**
*****ADMITTED NJ, PA**
TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

September 2 , 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
ARTICLE #7007 3020 0000 0779 5548
7007 3020 0000 0779 5531

Robert Phillips
Michelle E. Phillips

912 Clara Street
Houtzdale PA 16651

RE: Mortgage Loan dated March 18, 1999

Lender: Brown Bark II, L.P.

NOTICE OF INTENTION TO FORECLOSE

Dear Mortgagor:

The Mortgage serviced/held by Brown Bark II, L.P. (hereinafter we, us or ours) on your property located at 912 Clara Street Houtzdale, PA 16651 IS IN SERIOUS DEFAULT because you have not made the monthly payments of \$300.98 for the months of February 15, 2004 through August 15, 2008.

The last assessed late charge on this account was \$15.05 at a late charge rate of 5% for each delinquent payment(s). As of today, late charges have accrued to the total amount of \$181.60. Other charges including BPO fees & Taxes paid by lender have accrued at the total amount of \$770.32. The total amount now required to cure this default, or in other words, get caught up in your payments, as of the date of this letter is \$17505.82.

EXHIBIT A

You may cure this default within THIRTY (30) DAYS of the date of this letter, by paying to us the above amount of \$17505.82, plus any additional monthly payments and late charges which may fall due during this period. To confirm if any additional amounts are due, you may contact us at (856) 669-5400 or (215) 568-9500. All payments must be made either by cash, cashier's check, certified check or money order, and made to

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620

If you do not cure the default within THIRTY (30) DAYS, we intend to exercise the lender's right to accelerate the mortgage payments. This means that whatever is owing on the original amount borrowed will be considered due immediately and you may lose the chance to pay off the original mortgage in monthly installments.

If full payment of the amount of default is not made within THIRTY (30) DAYS, the lender also intends to instruct our firm to start a lawsuit to foreclose your mortgaged property. If the mortgage is foreclosed your mortgaged property will be sold by the Sheriff or other similar official to pay off the mortgage debt. If you cure the default before we begin legal proceedings against you, you will still have to pay the reasonable attorney's fees actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay the reasonable attorney's fees even if they are over \$50.00. Any attorney's fees will be added to whatever you owe the lender, which may also include our reasonable costs. If you cure the default within the THIRTY (30) DAY period you will not be required to pay attorney's fees.

The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's or other similar official foreclosure sale. You may do so by paying the total amount of the unpaid monthly payments plus any late or other charges then due, as well as the reasonable attorney's fees and costs connected with the foreclosure sale and perform any other requirements under the mortgage. It is estimated that the earliest date that such a Sheriff's or other similar official's sale could be held would be approximately six months from the date of this letter. A notice of the date of the Sheriff's or similar official sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment will be by calling us at the following number: (856) 669-5400 extension 5644. This payment must be cash, cashier's check, certified check or money order and made payable to us at the address stated above.

You should realize that a Sheriff's or other similar official sale will end your ownership of the mortgaged property and your right to remain in it. If you continue to live in the property after the Sheriff's or other similar official sale, a lawsuit could be started to evict you.

You shall have the right to assert in the foreclosure proceedings, the non-existence of a default or any other defense that you may have to acceleration or foreclosure.

You have additional rights to help protect your interest in the property. YOU HAVE THE RIGHT TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT, OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT. YOU MAY HAVE THE RIGHT TO SELL OR TRANSFER THE PROPERTY SUBJECT TO THE MORTGAGE TO A BUYER OR TRANSFEREE WHO WILL ASSUME THE MORTGAGE DEBT, PROVIDED THAT ALL THE OUTSTANDING PAYMENTS, CHARGES AND ATTORNEY'S FEES AND COSTS ARE PAID PRIOR TO OR AT THE SALE, AND THAT THE OTHER REQUIREMENTS UNDER THE MORTGAGE ARE SATISFIED. CONTACT US TO DETERMINE UNDER WHAT CIRCUMSTANCES THIS RIGHT MIGHT EXIST. YOU HAVE THE RIGHT TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.

If you cure the default, the mortgage will be restored to the same position as if no default had occurred. However, you are not entitled to this right to cure your default more than three times in any calendar year.

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

cc: First Class Mail

NOTICE

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If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

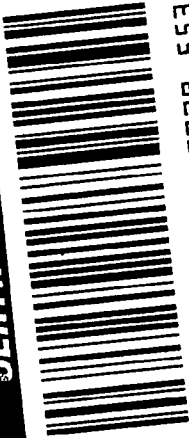
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**UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
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ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 669-5400**

NRK 2332-1101

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENT
111 WOODCREST ROAD
CHERRY HILL, NJ 08003

Michelle E. Phillips
912 Clara Street
Short Hills NJ 07065



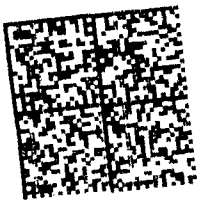
TESS 6220 0000 020E 2007
TESS 6220 0000 020E 2007
TESS 6220 0000 020E 2007

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com
OFFICIAL USE

Postage	\$ 4.20
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32

Postmark
Here

Sent to *Michelle E. Phillips*
Street, Apt. No. or PO Box No. *912 Clara St*
City, State, Zip+4 *Short Hills NJ 07065*
PS Form 3800, August 2006 See Reverse for Instructions



Hasler

016H26519216
\$05.320
09/02/2008
Mailed From 08003
US POSTAGE

IMPORTANT: Save this receipt and present it when making an inquiry.
PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years


Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail.
- Certified Mail is *not* available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuable, please consider insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery (PS Form 3811) to the addressee and attach a Return Receipt (PS Form 3811) to the article and applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is not available, the clerk will create at the post office.

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

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

A. Signature 		<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
B. Received by (Printed Name)		C. Date of Delivery
D. Is delivery address different from item 1? <input type="checkbox"/> Yes		

1. Article Addressed to:
Michelle Z. Phule-JS

912 Clara St.
Hawthorne, CA
16657

3. Service Type

☐ Registered
☐ Insured Mail
☒ Return Receipt for Merchandise
☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number **7007 3020 0000 0779 553L**

(Transfer from SL)

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

11/11/11 12:22 PM

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENT
111 WOODCREST ROAD
CHERRY HILL, NJ 08003

Robert F Phillips
912 Cedar Street
Holtzdale PA 16651

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL™



9455 6220 0000 0206 2002
9455 6220 0000 0206 2002

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$ 4.2
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32

Postmark
Here

Sent To:	Robert F Phillips
Street, Apt. No. or PO Box No.	912 Cedar St
City, State, ZIP+4	Holtzdale PA 16651

PS Form 3800, August 2006 See Reverse for Instructions



Hasler

016H26519216
\$05.32
09/02/2008
Mailed From 08003
US POSTAGE

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail.
- For an additional fee, please consider insured or Registered Mail.

For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain a *Return Receipt*, please complete and attach a *Return Receipt* (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver, a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.

- For an additional fee, delivery may be restricted to the addressee's authorized agent. Advise the clerk or mark the mailpiece with endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the clerk at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Robert J. Dineen
912 Clara St
Bout3dall Pa 16657

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

B. Received by (Printed Name)

C. Date of Delivery

☐ Agent
☐ Addressee

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number
(Transfer from service label)

7007 3020 0000 0779 5548

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

V E R I F I C A T I O N

The undersigned, hereby states that he/she is the attorney for the Plaintiff, a corporation unless designated otherwise; that he/she is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he/she has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his/her knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

BY Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
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WOODCREST CORPORATE CENTER

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CHERRY HILL, NJ 08003-3620

856-669-5400

Brown Bark II, L.P.
Plaintiff

v.

Robert F. Phillips
Michelle E. Phillips

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2008-2046-CD

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY:

Kindly reinstate the Complaint on the above-captioned matter.

DATE: December 4, 2008

UDREN LAW OFFICES, P.C.

BY Chandra Arkema

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

9
FILED Pd \$7.00
m/3:25cm 4 reinstated Complaints to shcl
DEC 09 2008 lcc to Atty
William A. Shaw
Prothonotary/Clerk of Courts

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

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Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

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COMPLAINT IN MORTGAGE FORECLOSURE

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

08080332-1 myk

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-2046-CD

BROWN BARK II, L.P.

vs

SERVICE # 2 OF 2

ROBERT F. PHILLIPS and MICHELLE E. PHILLIPS

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 11/23/2008

HEARING:

PAGE: 104848

DEFENDANT: MICHELLE E. PHILLIPS
ADDRESS: 912 CLARA STREET
HOUTZDALE, PA 16651

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

ATTEMPTS

11-17-08 - 11:20 AM - N/H

11-18-08 - 10:00 AM - N/H

FILED

018:30 AM
DEC 15 2008

William A. Shaw
Prothonotary/Clerk of Courts
OCCUPIED

11-20-08 - 1:30 PM - N/H

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON MICHELLE E. PHILLIPS, 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 MICHELLE E. PHILLIPS

AT (ADDRESS) _____

NOW 11-24-08 AT 9:00 AM AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO MICHELLE E. PHILLIPS

REASON UNABLE TO LOCATE Not home / No response

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Dominic L. Moricello
Deputy Signature

Dominic L. Moricello
Print Deputy Name

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff
v.

Robert F. Phillips
Michelle E. Phillips
912 Clara Street
Houtzdale, PA 16651
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

NO. 2008-2046-CD

COMPLAINT IN MORTGAGE FORECLOSURE

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: The Bank of New York Trust Company, N.A. as successor to JPMorgan Chase Bank, N.A. successor by merger to Bank One National Association as Trustee, Residential Funding Company, LLC f/k/a Residential Funding Corporation, Attorney in fact

Assignee: Brown Bark II, L.P.

Recording Date: 12/3/07 Instrument No: 200719812

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 912 Clara Street

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Houtzdale

COUNTY: Clearfield

DATE EXECUTED: 3/18/99

DATE RECORDED: 3/24/99 INSTRUMENT NO: 199904436

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by

said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

- (a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated below;
- (b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 9/15/08:

Principal of debt due	\$28,262.03
Unpaid Interest at 12.135% from 1/15/04 to 9/15/08 (the per diem interest accruing on this debt is \$9.40 and that sum should be added each day after 9/15/08)	15,718.92
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$15.05 should be added in accordance with the terms of the note each month after 9/15/08)	181.60
BPO	100.00
Attorneys Fees (anticipated and actual to 5% of principal)	<u>1,413.10</u>
TOTAL	\$46,280.65

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. Notice of Intention to Foreclose under Act 6 of 1974 of

the Commonwealth of Pennsylvania has been sent to each Defendant, certified mail, in accordance with the requirements of that act, and copy(s) are attached hereto as Exhibit "A" and made part hereof.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$46,280.65 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.

UDREN LAW OFFICES, P.C.

BY Chandra Arkema

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

LOUIS A. SIMONI, ESQUIRE

ALL THAT CERTAIN PIECE, PARCEL OR LOT OF GROUND SITUATE IN THE BOROUGH OF HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BOUNDED ON THE SOUTH BY CLARA STREET AND RUNNING WEST ALONG CLARA STREET FIFTY (50') FEET TO A POST ON LINE OF LOT NO. 611; THENCE NORTH ALONG THE LINE OF SAID LOT NO. 611, ONE HUNDRED FIFTY (150') FEET TO A POST ON BEAR ALLEY; THENCE EAST ALONG THE LINE OF BEAR AVENUE, FIFTY (50') FEET TO A POST ON LINE ALLEY; AND THENCE SOUTH ALONG THE LINE OF SAID ALLEY, ONE HUNDRED FIFTY (150') FEET TO A POST ON CLARE STREET, THE PLACE OF BEGINNING, AND KNOWN AS LOT NO. 609 IN THE GENERAL PLAN OF THE BOROUGH OF HOUTZDALE. HAVING THEREON ERECTED A ONE STORY, FRAME DWELLING HOUSE, BUNGALOW TYPE, AND OTHER OUT BUILDINGS. BEING FURTHER IDENTIFIED BY CLEARFIELD COUNTY MAP ASSESSMENT NUMBER 10-M14-397-00013.

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
SUITE 200

CHERRY HILL, NEW JERSEY 08003-3620
856.669.5400
FAX: 856.669.5399

Pennsylvania Office
(215) 568-9500

MARK J. UDREN*
STUART WINNEG**
LORRAINE DOYLE**
ALAN M. MINATO***
CHANDRA M. ARKEMA***
***ADMITTED NJ, PA, FL**
****ADMITTED PA**
*****ADMITTED NJ, PA**
TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

September *2* , 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
ARTICLE #7007 3020 0000 0779 5548
7007 3020 0000 0779 5531

Robert Phillips
Michelle E. Phillips

912 Clara Street
Houtzdale PA 16651

RE: Mortgage Loan dated March 18, 1999

Lender: Brown Bark II, L.P.

NOTICE OF INTENTION TO FORECLOSE

Dear Mortgagor:

The Mortgage serviced/held by Brown Bark II, L.P. (hereinafter we, us or ours) on your property located at 912 Clara Street Houtzdale, PA 16651 IS IN SERIOUS DEFAULT because you have not made the monthly payments of \$300.98 for the months of February 15, 2004 through August 15, 2008.

The last assessed late charge on this account was \$15.05 at a late charge rate of 5% for each delinquent payment(s). As of today, late charges have accrued to the total amount of \$181.60. Other charges including BPO fees & Taxes paid by lender have accrued at the total amount of \$770.32. The total amount now required to cure this default, or in other words, get caught up in your payments, as of the date of this letter is \$17505.82.

EXHIBIT A

You may cure this default within THIRTY (30) DAYS of the date of this letter, by paying to us the above amount of \$17505.82, plus any additional monthly payments and late charges which may fall due during this period. To confirm if any additional amounts are due, you may contact us at (856) 669-5400 or (215) 568-9500. All payments must be made either by cash, cashier's check, certified check or money order, and made to

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620

If you do not cure the default within THIRTY (30) DAYS, we intend to exercise the lender's right to accelerate the mortgage payments. This means that whatever is owing on the original amount borrowed will be considered due immediately and you may lose the chance to pay off the original mortgage in monthly installments.

If full payment of the amount of default is not made within THIRTY (30) DAYS, the lender also intends to instruct our firm to start a lawsuit to foreclose your mortgaged property. If the mortgage is foreclosed your mortgaged property will be sold by the Sheriff or other similar official to pay off the mortgage debt. If you cure the default before we begin legal proceedings against you, you will still have to pay the reasonable attorney's fees actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay the reasonable attorney's fees even if they are over \$50.00. Any attorney's fees will be added to whatever you owe the lender, which may also include our reasonable costs. If you cure the default within the THIRTY (30) DAY period you will not be required to pay attorney's fees.

The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's or other similar official foreclosure sale. You may do so by paying the total amount of the unpaid monthly payments plus any late or other charges then due, as well as the reasonable attorney's fees and costs connected with the foreclosure sale and perform any other requirements under the mortgage. It is estimated that the earliest date that such a Sheriff's or other similar official's sale could be held would be approximately six months from the date of this letter. A notice of the date of the Sheriff's or similar official sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment will be by calling us at the following number: (856) 669-5400 extension 5644. This payment must be cash, cashier's check, certified check or money order and made payable to us at the address stated above.

You should realize that a Sheriff's or other similar official sale will end your ownership of the mortgaged property and your right to remain in it. If you continue to live in the property after the Sheriff's or other similar official sale, a lawsuit could be started to evict you.

You shall have the right to assert in the foreclosure proceedings, the non-existence of a default or any other defense that you may have to acceleration or foreclosure.

You have additional rights to help protect your interest in the property. YOU HAVE THE RIGHT TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT, OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT. YOU MAY HAVE THE RIGHT TO SELL OR TRANSFER THE PROPERTY SUBJECT TO THE MORTGAGE TO A BUYER OR TRANSFEREE WHO WILL ASSUME THE MORTGAGE DEBT, PROVIDED THAT ALL THE OUTSTANDING PAYMENTS, CHARGES AND ATTORNEY'S FEES AND COSTS ARE PAID PRIOR TO OR AT THE SALE, AND THAT THE OTHER REQUIREMENTS UNDER THE MORTGAGE ARE SATISFIED. CONTACT US TO DETERMINE UNDER WHAT CIRCUMSTANCES THIS RIGHT MIGHT EXIST. YOU HAVE THE RIGHT TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.

If you cure the default, the mortgage will be restored to the same position as if no default had occurred. However, you are not entitled to this right to cure your default more than three times in any calendar year.

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

cc: First Class Mail

NOTICE

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If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

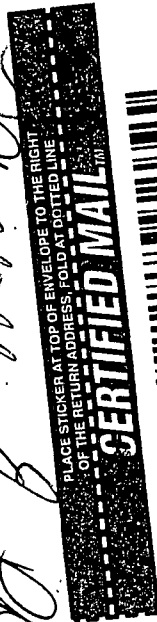
This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 669-5400**

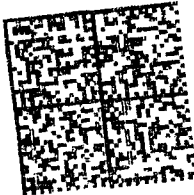
NRK 332-11001

UDREN LAW OFFICES, P.C.
DODCREST CORPORATE CENT
111 WOODCREST ROAD
CHERRY HILL, NJ 08003

Michelle E. Phillips
912 Clara Street
Montgomery AL 36105



TESS 6420 0000 020E 2002
TESS 6420 0000 020E 2002



Hasler

016H26519216
\$05.320
09/02/2008
Mailed From 08003
US POSTAGE

U.S. Postal ServiceTM
CERTIFIED MAILTM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

OFFICIAL USE	
Postage	\$ 4.2
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32

Postmark Here

Sent to *Michelle E. Phillips*
Street, Apt. No. or PO Box No. *912 Clara St*
City, State ZIP+4[®] *Montgomery AL 36105*

PS Form 3800, August 2006 See Reverse for Instructions

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

IMPORTANT: Save this receipt and present it when making an inquiry.

- If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking.
- For an additional fee, delivery may be restricted to the addressee or endorsement's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For an additional fee, please consider Insured or Registered Mail. For valuables, please consider Insured or Registered Mail.
- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is not available for any class of international mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.

Important Reminders:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Certified Mail Provides:

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Michelle S. Phelan
912 Clara St
Huntsdale IL
16651

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☐ Agent ☐ Addressee

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

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

3. Service Type ☒ Certified Mail ☐ Express Mail ☐ Return Receipt for Merchandise

☐ Registered ☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

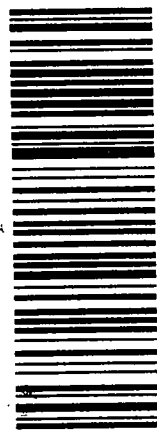
2. Article Number 7007 3020 0000 0779 5531
(Transfer from SL)

NOV 12 2006

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENT
111 WOODCREST ROAD
CHERRY HILL, NJ 08003

Robert F Phillips
912 Clara Street
Hartford CT 06105

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL



8455 6220 0000 0206 2006
8455 6220 0000 0206 2006

U.S. Postal Service TM
CERTIFIED MAIL TM RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

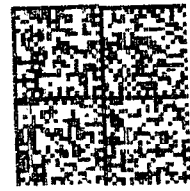
For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$ 4.2
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 9.10

Postmark
Here

Sent to: Robert F Phillips
Street, Apt. No. or PO Box No. 912 Clara St
City, State, ZIP+4 Hartford CT 06105
PS Form 3800, August 2006 See Reverse for Instructions



Hasler

016H26519216
\$05.320
09/02/2008
Mailed From 08003
US POSTAGE

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®
- Certified Mail is NOT available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee's authorized agent. Advise the clerk or mark the mailpiece with endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the clerk at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Robert J. Quinn
912 Clara St
Bout3dell Pa 16657

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7007 3020 0000 0779 554B

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

V E R I F I C A T I O N

The undersigned, hereby states that he/she is the attorney for the Plaintiff, a corporation unless designated otherwise; that he/she is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he/she has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his/her knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

BY Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE
LOUIS A. SIMONI, ESQUIRE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-2046-CD

BROWN BARK II, L.P.

vs

SERVICE # 1 OF 2

ROBERT F. PHILLIPS and MICHELLE E. PHILLIPS

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 11/23/2008

HEARING:

PAGE: 104848

DEFENDANT: ROBERT F. PHILLIPS
ADDRESS: 912 CLARA STREET
HOUTZDALE, PA 16651

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

ATTEMPTS

11-17-08 11:20 AM - N/H

11-18-08 10:00 AM - N/H

^S FILED

018:30 am
DEC 15 2008

William A. Shaw
Prothonotary/Clerk of Courts

11/20/08 1:30 PM

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON ROBERT F. PHILLIPS, 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 ROBERT F. PHILLIPS

AT (ADDRESS) _____

NOW 11-24-08 AT 9:00 A.M. AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO ROBERT F. PHILLIPS

REASON UNABLE TO LOCATE Not home / no response

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answered: CHESTER A. HAWKINS, SHERIFF

BY:

Dominic L. Morgello
Deputy Signature

Dominic L. Morgello
Print Deputy Name

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff
v.

Robert F. Phillips
Michelle E. Phillips
912 Clara Street
Houtzdale, PA 16651
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

NO. 2008-2046-CD

Oct 1 2008

COMPLAINT IN MORTGAGE FORECLOSURE

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERRAL SERVICE
David S. Mehlick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta ascentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se dafiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: The Bank of New York Trust Company, N.A. as successor to JPMorgan Chase Bank, N.A. successor by merger to Bank One National Association as Trustee, Residential Funding Company, LLC f/k/a Residential Funding Corporation, Attorney in fact

Assignee: Brown Bark II, L.P.

Recording Date: 12/3/07 Instrument No: 200719812

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 912 Clara Street

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Houtzdale

COUNTY: Clearfield

DATE EXECUTED: 3/18/99

DATE RECORDED: 3/24/99 INSTRUMENT NO: 199904436

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by

said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

- (a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated below;
- (b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 9/15/08:

Principal of debt due	\$28,262.03
Unpaid Interest at 12.135% from 1/15/04 to 9/15/08 (the per diem interest accruing on this debt is \$9.40 and that sum should be added each day after 9/15/08)	15,718.92
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$15.05 should be added in accordance with the terms of the note each month after 9/15/08)	181.60
BPO	100.00
Attorneys Fees (anticipated and actual to 5% of principal)	<u>1,413.10</u>
TOTAL	\$46,280.65

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. Notice of Intention to Foreclose under Act 6 of 1974 of

the Commonwealth of Pennsylvania has been sent to each Defendant, certified mail, in accordance with the requirements of that act, and copy(s) are attached hereto as Exhibit "A" and made part hereof.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$46,280.65 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.

UDREN LAW OFFICES, P.C.

BY Chandra Arkema

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

LOUIS A. SIMONI, ESQUIRE

ALL THAT CERTAIN PIECE, PARCEL OR LOT OF GROUND SITUATE IN THE BOROUGH OF HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BOUNDED ON THE SOUTH BY CLARA STREET AND RUNNING WEST ALONG CLARA STREET FIFTY (50') FEET TO A POST ON LINE OF LOT NO. 611; THENCE NORTH ALONG THE LINE OF SAID LOT NO. 611, ONE HUNDRED FIFTY (150') FEET TO A POST ON BEAR ALLEY; THENCE EAST ALONG THE LINE OF BEAR AVENUE, FIFTY (50') FEET TO A POST ON LINE ALLEY; AND THENCE SOUTH ALONG THE LINE OF SAID ALLEY, ONE HUNDRED FIFTY (150') FEET TO A POST ON CLARE STREET, THE PLACE OF BEGINNING, AND KNOWN AS LOT NO. 609 IN THE GENERAL PLAN OF THE BOROUGH OF HOUTZDALE. HAVING THEREON ERECTED A ONE STORY, FRAME DWELLING HOUSE, BUNGALOW TYPE, AND OTHER OUT BUILDINGS. BEING FURTHER IDENTIFIED BY CLEARFIELD COUNTY MAP ASSESSMENT NUMBER 10-M14-397-00013.

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
SUITE 200

CHERRY HILL, NEW JERSEY 08003-3620
856. 669. 5400
FAX: 856. 669. 5399

Pennsylvania Office
(215) 568-9500

MARK J. UDREN*
STUART WINNEG**
LORRAINE DOYLE**
ALAN M. MINATO***
CHANDRA M. ARKEMA***
***ADMITTED NJ, PA, FL**
****ADMITTED PA**
*****ADMITTED NJ, PA**
TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

September 2 , 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
ARTICLE #7007 3020 0000 0779 5548
7007 3020 0000 0779 5531

Robert Phillips
Michelle E. Phillips

912 Clara Street
Houtzdale PA 16651

RE: Mortgage Loan dated March 18, 1999

Lender: Brown Bark II, L.P.

NOTICE OF INTENTION TO FORECLOSE

Dear Mortgagor:

The Mortgage serviced/held by Brown Bark II, L.P. (hereinafter we, us or ours) on your property located at 912 Clara Street Houtzdale, PA 16651 IS IN SERIOUS DEFAULT because you have not made the monthly payments of \$300.98 for the months of February 15, 2004 through August 15, 2008.

The last assessed late charge on this account was \$15.05 at a late charge rate of 5% for each delinquent payment(s). As of today, late charges have accrued to the total amount of \$181.60. Other charges including BPO fees & Taxes paid by lender have accrued at the total amount of \$770.32. The total amount now required to cure this default, or in other words, get caught up in your payments, as of the date of this letter is \$17505.82.

EXHIBIT A

You may cure this default within THIRTY (30) DAYS of the date of this letter, by paying to us the above amount of \$17505.82, plus any additional monthly payments and late charges which may fall due during this period. To confirm if any additional amounts are due, you may contact us at (856) 669-5400 or (215) 568-9500. All payments must be made either by cash, cashier's check, certified check or money order, and made to

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620

If you do not cure the default within THIRTY (30) DAYS, we intend to exercise the lender's right to accelerate the mortgage payments. This means that whatever is owing on the original amount borrowed will be considered due immediately and you may lose the chance to pay off the original mortgage in monthly installments.

If full payment of the amount of default is not made within THIRTY (30) DAYS, the lender also intends to instruct our firm to start a lawsuit to foreclose your mortgaged property. If the mortgage is foreclosed your mortgaged property will be sold by the Sheriff or other similar official to pay off the mortgage debt. If you cure the default before we begin legal proceedings against you, you will still have to pay the reasonable attorney's fees actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay the reasonable attorney's fees even if they are over \$50.00. Any attorney's fees will be added to whatever you owe the lender, which may also include our reasonable costs. If you cure the default within the THIRTY (30) DAY period you will not be required to pay attorney's fees.

The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's or other similar official foreclosure sale. You may do so by paying the total amount of the unpaid monthly payments plus any late or other charges then due, as well as the reasonable attorney's fees and costs connected with the foreclosure sale and perform any other requirements under the mortgage. It is estimated that the earliest date that such a Sheriff's or other similar official's sale could be held would be approximately six months from the date of this letter. A notice of the date of the Sheriff's or similar official sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment will be by calling us at the following number: (856) 669-5400 extension 5644. This payment must be cash, cashier's check, certified check or money order and made payable to us at the address stated above.

You should realize that a Sheriff's or other similar official sale will end your ownership of the mortgaged property and your right to remain in it. If you continue to live in the property after the Sheriff's or other similar official sale, a lawsuit could be started to evict you.

You shall have the right to assert in the foreclosure proceedings, the non-existence of a default or any other defense that you may have to acceleration or foreclosure.

You have additional rights to help protect your interest in the property. YOU HAVE THE RIGHT TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT, OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT. YOU MAY HAVE THE RIGHT TO SELL OR TRANSFER THE PROPERTY SUBJECT TO THE MORTGAGE TO A BUYER OR TRANSFEREE WHO WILL ASSUME THE MORTGAGE DEBT, PROVIDED THAT ALL THE OUTSTANDING PAYMENTS, CHARGES AND ATTORNEY'S FEES AND COSTS ARE PAID PRIOR TO OR AT THE SALE, AND THAT THE OTHER REQUIREMENTS UNDER THE MORTGAGE ARE SATISFIED. CONTACT US TO DETERMINE UNDER WHAT CIRCUMSTANCES THIS RIGHT MIGHT EXIST. YOU HAVE THE RIGHT TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.

If you cure the default, the mortgage will be restored to the same position as if no default had occurred. However, you are not entitled to this right to cure your default more than three times in any calendar year.

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

cc: First Class Mail

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do not notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 669-5400**

NRK 332-1101

UDREN LAW OFFICES, P.C.
ODCREST CORPORATE CENT
111 WOODCREST ROAD
CHERRY HILL, NJ 08003

Michelle E. Phillips
912 Clara Street
Holtsdale NJ 08051



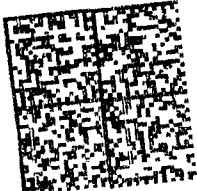
TESS 6220 0000 020E 2007
TESS 6220 0000 020E 2007

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com
OFFICIAL USE

Postage	\$ 4.20
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32

Postmark Here

Sent to *Michelle E. Phillips*
Street, Apt. No., or PO Box No. *912 Clara St*
City, State, ZIP+4 *Holtsdale NJ 08051*
PS Form 3800, August 2006 See Reverse for Instructions



Hasler

016H26519216
\$05.320
09/02/2008
Mailed From 08003
US POSTAGE

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

IMPORTANT: Save this receipt and present it when making an inquiry.

- If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking.
- For an additional fee, delivery may be restricted to the addressee or endorsement's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- For an additional fee, delivery may be restricted to the addressee or endorsement's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- For an additional fee, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, please consider insured or Registered Mail. For valuables, please consider insured or Registered Mail.
- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail.

Important Reminders:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Certified Mail Provides:

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Michelle S. Phillips
912 Clara St
Houston, TX
77057

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

B. Received by (Printed Name)

☐ Addressee

D. Is delivery address different from item 1? If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number 7007 3020 0000 0779 5531
Transfer from SL

NOV 12 2007

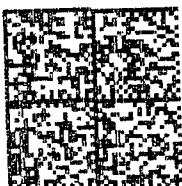
UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENT
111 WOODCREST ROAD
CHERRY HILL, NJ 08003

Robert J Phillips
912 Clara Street
Hartford CT 06105



9455 6220 0000 0206 2007
9455 6220 0000 0206 2007

U.S. Postal Service TM	
CERTIFIED MAILTM RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage	\$ 4.20
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 9.10
Postmark Here	
Sent To: Robert J Phillips	
Street, Apt. No. or PO Box No. 912 Clara St	
City, State, ZIP+4 Hartford CT 06105	
PS Form 3800, August 2006 See Reverse for Instructions	



Hasler

016H26519216
\$05.320
09/02/2008
Mailed From 08003
US POSTAGE

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®
- Certified Mail is NOT available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail.

- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.

- For an additional fee, delivery may be restricted to the addressee's authorized agent. Advise the clerk or mark the mailpiece with endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the receipt at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry

PS Form 3800, August 2005 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Robert J. Diller
912 Cleave St
Kautzdale Pa 16651

COMPLETE THIS SECTION ON DELIVERY

A. Signature	<input type="checkbox"/> Agent <input type="checkbox"/> Addressee
X	
B. Received by (Printed Name)	C. Date of Delivery

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

3. Service Type	
<input checked="" type="checkbox"/> Certified Mail	<input type="checkbox"/> Express Mail
<input type="checkbox"/> Registered	<input checked="" type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Insured Mail	<input type="checkbox"/> C.O.D.
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes	

2. Article Number

(Transfer from service label)

7007 3020 0000 0779 5548

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

V E R I F I C A T I O N

The undersigned, hereby states that he/she is the attorney for the Plaintiff, a corporation unless designated otherwise; that he/she is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he/she has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his/her knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

BY Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE
LOUIS A. SIMONI, ESQUIRE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2046-CD

BROWN BARK II, L.P.

vs

SERVICE # 4 OF 4

ROBERT F. PHILLIPS & MICHELLE E. PHILLIPS

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 01/08/2009

HEARING:

PAGE: 105047

FILED
08:30 a.m. GK
DEC 16 2008
William A. Shaw
Prothonotary/Clerk of Courts

DEFENDANT: MICHELLE E. PHILLIPS
ADDRESS: 5887 GLEN HOPE BLVD.
GLEN HOPE, PA 16645

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, 12-15-08 AT 2:21 AM / PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON MICHELLE E. PHILLIPS, DEFENDANT

BY HANDING TO Robert Phillips, Husband

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

ADDRESS SERVED 5887 Glen Hope Blvd.
Glen Hope, Pa. 16645

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE FOR MICHELLE E. PHILLIPS

AT (ADDRESS) _____

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

I MAKE RETURN OF NOT FOUND AS TO MICHELLE E. PHILLIPS

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF *

BY: James E. Davis

Deputy Signature

JAMES E. DAVIS
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
NO: 08-2046-CD

BROWN BARK II, L.P.

vs

SERVICE # 3 OF 4

ROBERT F. PHILLIPS & MICHELLE E. PHILLIPS

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 01/08/2009

HEARING:

PAGE: 105047

DEFENDANT: ROBERT F. PHILLIPS
ADDRESS: 5887 GLEN HOPE BLVD.
GLEN HOPE, PA 16645

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, 12-15-08 AT 2:21 AM (C) SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON ROBERT F. PHILLIPS, DEFENDANT

BY HANDING TO Robert F. Phillips, Def.

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

ADDRESS SERVED 5887 Glen Hope Blvd.
Glen Hope, Pa. 16645

NOW _____ AT _____ AM / PM POSTED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE FOR ROBERT F. PHILLIPS

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO ROBERT F. PHILLIPS

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

James F. Davis
Deputy Signature
James F. Davis
Print Deputy Name

Elenore Kasubick

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2046-CD

BROWN BARK II, L.P.

VS

SERVICE # 1 OF 4

ROBERT F. PHILLIPS & MICHELLE E. PHILLIPS

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 01/08/2009

HEARING:

PAGE: 105047

DEFENDANT:

ROBERT F. PHILLIPS

ADDRESS:

912 CLARA STREET

HOUTZDALE, PA 16651

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 ROBERT F. PHILLIPS, 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 ROBERT F. PHILLIPS

AT (ADDRESS) _____

NOW 12-18-08 AT 3:27 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO ROBERT F. PHILLIPS

REASON UNABLE TO LOCATE

*Def's. NOT living AT Above Address
Occupied by Others*

SWORN TO BEFORE ME THIS

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy Signature

Print Deputy Name

9
FILED
013.3460
DEC 18 2008
William A. Shaw
Prothonotary/Clerk of Courts

_____ DAY OF _____ 2008

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff
v.

Robert F. Phillips
Michelle E. Phillips
912 Clara Street
Houtzdale, PA 16651
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2008-2046-C

FILED

OCT 22 2008

William A. Shaw -
Prothonotary/Clerk of Courts

COMPLAINT IN MORTGAGE FORECLOSURE

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERRAL SERVICE

David S. Meholick

Court Administrator

Clearfield Count Courthouse

Clearfield, PA 16830

814-765-2641 x 5982

December 9 2008 Document
Reinstated/Reissued to Sheriff/Attorney
for service.
William A. Shaw
Deputy Prothonotary

08080332-1 myk

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: The Bank of New York Trust Company, N.A. as successor to JPMorgan Chase Bank, N.A. successor by merger to Bank One National Association as Trustee, Residential Funding Company, LLC f/k/a Residential Funding Corporation, Attorney in fact

Assignee: Brown Bark II, L.P.

Recording Date: 12/3/07 Instrument No: 200719812

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 912 Clara Street

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Houtzdale

COUNTY: Clearfield

DATE EXECUTED: 3/18/99

DATE RECORDED: 3/24/99 INSTRUMENT NO: 199904436

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by

said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

- (a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated below;
- (b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 9/15/08:

Principal of debt due	\$28,262.03
Unpaid Interest at 12.135% from 1/15/04 to 9/15/08 (the per diem interest accruing on this debt is \$9.40 and that sum should be added each day after 9/15/08)	15,718.92
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$15.05 should be added in accordance with the terms of the note each month after 9/15/08)	181.60
BPO	100.00
Attorneys Fees (anticipated and actual to 5% of principal)	<u>1,413.10</u>
TOTAL	\$46,280.65

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. Notice of Intention to Foreclose under Act 6 of 1974 of

the Commonwealth of Pennsylvania has been sent to each Defendant, certified mail, in accordance with the requirements of that act, and copy(s) are attached hereto as Exhibit "A" and made part hereof.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$46,280.65 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.

UDREN LAW OFFICES, P.C.

BY Chandra Arkema

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

LOUIS A. SIMONI, ESQUIRE

ALL THAT CERTAIN PIECE, PARCEL OR LOT OF GROUND SITUATE IN THE BOROUGH OF HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BOUNDED ON THE SOUTH BY CLARA STREET AND RUNNING WEST ALONG CLARA STREET FIFTY (50') FEET TO A POST ON LINE OF LOT NO. 611; THENCE NORTH ALONG THE LINE OF SAID LOT NO. 611, ONE HUNDRED FIFTY (150') FEET TO A POST ON BEAR ALLEY; THENCE EAST ALONG THE LINE OF BEAR AVENUE, FIFTY (50') FEET TO A POST ON LINE ALLEY; AND THENCE SOUTH ALONG THE LINE OF SAID ALLEY, ONE HUNDRED FIFTY (150') FEET TO A POST ON CLARE STREET, THE PLACE OF BEGINNING, AND KNOWN AS LOT NO. 609 IN THE GENERAL PLAN OF THE BOROUGH OF HOUTZDALE. HAVING THEREON ERECTED A ONE STORY, FRAME DWELLING HOUSE, BUNGALOW TYPE, AND OTHER OUT BUILDINGS. BEING FURTHER IDENTIFIED BY CLEARFIELD COUNTY MAP ASSESSMENT NUMBER 10-M14-397-00013.

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
SUITE 200

CHERRY HILL, NEW JERSEY 08003-3620
856. 669. 5400
FAX: 856. 669. 5399

Pennsylvania Office
(215) 568-9500

MARK J. UDREN*
STUART WINNEG**
LORRAINE DOYLE**
ALAN M. MINATO***
CHANDRA M. ARKEMA***
*ADMITTED NJ, PA, FL
**ADMITTED PA
***ADMITTED NJ, PA
TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

September 2, 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
ARTICLE #7007 3020 0000 0779 5548
7007 3020 0000 0779 5531

Robert Phillips
Michelle E. Phillips

912 Clara Street
Houtzdale PA 16651

RE: Mortgage Loan dated March 18, 1999

Lender: Brown Bark II, L.P.

NOTICE OF INTENTION TO FORECLOSE

Dear Mortgagor:

The Mortgage serviced/held by Brown Bark II, L.P. (hereinafter we, us or ours) on your property located at 912 Clara Street Houtzdale, PA 16651 IS IN SERIOUS DEFAULT because you have not made the monthly payments of \$300.98 for the months of February 15, 2004 through August 15, 2008.

The last assessed late charge on this account was \$15.05 at a late charge rate of 5% for each delinquent payment(s). As of today, late charges have accrued to the total amount of \$181.60. Other charges including BPO fees & Taxes paid by lender have accrued at the total amount of \$770.32. The total amount now required to cure this default, or in other words, get caught up in your payments, as of the date of this letter is \$17505.82.

EXHIBIT A

You may cure this default within THIRTY (30) DAYS of the date of this letter, by paying to us the above amount of \$17505.82, plus any additional monthly payments and late charges which may fall due during this period. To confirm if any additional amounts are due, you may contact us at (856) 669-5400 or (215) 568-9500. All payments must be made either by cash, cashier's check, certified check or money order, and made to

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620

If you do not cure the default within THIRTY (30) DAYS, we intend to exercise the lender's right to accelerate the mortgage payments. This means that whatever is owing on the original amount borrowed will be considered due immediately and you may lose the chance to pay off the original mortgage in monthly installments.

If full payment of the amount of default is not made within THIRTY (30) DAYS, the lender also intends to instruct our firm to start a lawsuit to foreclose your mortgaged property. If the mortgage is foreclosed your mortgaged property will be sold by the Sheriff or other similar official to pay off the mortgage debt. If you cure the default before we begin legal proceedings against you, you will still have to pay the reasonable attorney's fees actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay the reasonable attorney's fees even if they are over \$50.00. Any attorney's fees will be added to whatever you owe the lender, which may also include our reasonable costs. If you cure the default within the THIRTY (30) DAY period you will not be required to pay attorney's fees.

The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's or other similar official foreclosure sale. You may do so by paying the total amount of the unpaid monthly payments plus any late or other charges then due, as well as the reasonable attorney's fees and costs connected with the foreclosure sale and perform any other requirements under the mortgage. It is estimated that the earliest date that such a Sheriff's or other similar official's sale could be held would be approximately six months from the date of this letter. A notice of the date of the Sheriff's or similar official sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment will be by calling us at the following number: (856) 669-5400 extension 5644. This payment must be cash, cashier's check, certified check or money order and made payable to us at the address stated above.

You should realize that a Sheriff's or other similar official sale will end your ownership of the mortgaged property and your right to remain in it. If you continue to live in the property after the Sheriff's or other similar official sale, a lawsuit could be started to evict you.

You shall have the right to assert in the foreclosure proceedings, the non-existence of a default or any other defense that you may have to acceleration or foreclosure.

You have additional rights to help protect your interest in the property. YOU HAVE THE RIGHT TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT, OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT. YOU MAY HAVE THE RIGHT TO SELL OR TRANSFER THE PROPERTY SUBJECT TO THE MORTGAGE TO A BUYER OR TRANSFEREE WHO WILL ASSUME THE MORTGAGE DEBT, PROVIDED THAT ALL THE OUTSTANDING PAYMENTS, CHARGES AND ATTORNEY'S FEES AND COSTS ARE PAID PRIOR TO OR AT THE SALE, AND THAT THE OTHER REQUIREMENTS UNDER THE MORTGAGE ARE SATISFIED. CONTACT US TO DETERMINE UNDER WHAT CIRCUMSTANCES THIS RIGHT MIGHT EXIST. YOU HAVE THE RIGHT TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.

If you cure the default, the mortgage will be restored to the same position as if no default had occurred. However, you are not entitled to this right to cure your default more than three times in any calendar year.

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

cc: First Class Mail

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 669-5400**

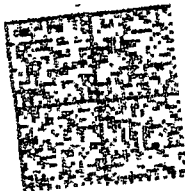
9876543211001

UDREN LAW OFFICES, P.C.
ODDREST CORPORATE CENT
111 WOODCREST ROAD
CHERRY HILL, NJ 08003

Michelle E. Phillips
912 Clara Street
Montgomery AL 36105



TESS 6420 0000 020E 2007
TESS 6420 0000 020E 2007



Haster

016H26519216
\$05.32
09/02/2008
Mailed from 08003
US POSTAGE

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com
OFFICIAL USE

Postage	\$ 4.2
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32

Postmark
Here

Sent to *Michelle E. Phillips*
Street, Apt. No. or PO Box No. *912 Clara St*
City, State, Zip *Montgomery AL 36105*
PS Form 3800, August 2005 See Reverse for Instructions

PS Form 3811, February 2004 Domestic Return Receipt

1. Article Addressed to:
Michelle S. Phleas
912 Clara St
Houtzdale Pa
16857

2. Article Number 7007 3020 0000 0779 5531
(Transfer from st)

SENDER: COMPLETE THIS SECTION

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ X ☐ Agent ☐ Addressee

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

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

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.
4. Restricted Delivery? (Extra Fee) ☐ Yes

Certified Mail Provides:
■ A mailing receipt
■ A unique identifier for your mailpiece
■ A record of delivery kept by the Postal Service for two years
Important Reminders:
■ Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®
■ NO INSURANCE COVERAGE IS PROVIDED with Certified Mail.
■ For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
■ If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.
IMPORTANT: Save this receipt and present it when making an inquiry.
PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENT
111 WOODCREST ROAD
CHERRY HILL, NJ 08003



9455 6220 0000 0202 2002
9455 6220 0000 0202 2002

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

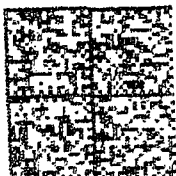
Postage	\$ 42
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 532

Postmark
Here

Sent to Robert F Phillips
Street, Apt. No. or PO Box No. 512 Clara St
City, State, ZIP+4 Cherrydale Pt 16651
PS Form 3800, August 2005 See Reverse for Instructions

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL

*Robert F Phillips
512 Clara Street
Cherrydale Pt 16651*



Master

016H26519216
\$05.320
09/02/2008
Mailed From 08003
US POSTAGE

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver, a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.

- For an additional fee, delivery may be restricted to the addressee's authorized agent. Advise the clerk or mark the mailpiece with endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the receipt at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Robert A. Phillips
912 Cleve St
Brentwood, TN 37027

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number
(Transfer from service label)

7007 3020 0000 0779 5548

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

V E R I F I C A T I O N

The undersigned, hereby states that he/she is the attorney for the Plaintiff, a corporation unless designated otherwise; that he/she is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he/she has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his/her knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

BY



Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

LOUIS A. SIMONI, ESQUIRE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2046-CD

BROWN BARK II, L.P.

VS

SERVICE # 2 OF 4

ROBERT F. PHILLIPS & MICHELLE E. PHILLIPS

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 01/08/2009

HEARING:

PAGE: 105047

DEFENDANT: MICHELLE E. PHILLIPS

ADDRESS: 912 CLARA STREET
HOUTZDALE, PA 16651

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

FILED
DEC 18 2008

William A. Shaw
Prothonotary/Clerk of Courts

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, _____ AT _____ AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON MICHELLE E. PHILLIPS, 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 MICHELLE E. PHILLIPS

AT (ADDRESS) _____

NOW 12-18-08 AT 3:27 AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO MICHELLE E. PHILLIPS

REASON UNABLE TO LOCATE Defs. Not living at above address
Occupied by others

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

BY:

Chester A. Hawkins, Sheriff
James E. Davis, Deputy Signature

Print Deputy Name

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff
v.

Robert F. Phillips
Michelle E. Phillips
912 Clara Street
Houtzdale, PA 16651
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2008-2046-C

FILED
OCT 22 2008

William A. Shaw -
Prothonotary/Clerk of Courts

COMPLAINT IN MORTGAGE FORECLOSURE

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERRAL SERVICE

David S. Meholick
Court Administrator

December 9, 2008 Document
Reinstated/Reissued to Sheriff/Attorney for service.
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

W. A. Shaw cm
Deputy Prothonotary

08080332-1 myk

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademias, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

**David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982**

NOTICE

The amount of your debt is as stated in the attached document. The name of the creditor to whom the debt is owed is as named in the attached document. Unless you notify us within 30 days after receipt of this Notice and the attached document that the validity of the stated debt, or any portion of it, is disputed, we will assume that the debt is valid. If you do notify us in writing of a dispute within the 30 day period, we will obtain verification of the debt or a copy of a judgment against you, and mail it to you. If you do not dispute the debt, it is not an admission of liability on your part. Also, upon your written request within the 30 day period, we will provide you with the name and address of the original creditor if different from the current creditor.

If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
/s/ Mark J. Udren, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, NJ 08003-3620
(856) 669-5400**

1. Plaintiff is the Corporation designated as such in the caption on a preceding page. If Plaintiff is an assignee then it is such by virtue of the following recorded assignments:

Assignor: The Bank of New York Trust Company, N.A. as successor to JPMorgan Chase Bank, N.A. successor by merger to Bank One National Association as Trustee, Residential Funding Company, LLC f/k/a Residential Funding Corporation, Attorney in fact

Assignee: Brown Bark II, L.P.

Recording Date: 12/3/07 Instrument No: 200719812

2. Defendant(s) is the individual designated as such on the caption on a preceding page, whose last known address is as set forth in the caption, and unless designated otherwise, is the real owner(s) and mortgagor(s) of the premises being foreclosed.

3. On or about the date appearing on the Mortgage hereinafter described, at the instance and request of Defendant(s), Plaintiff (or its predecessor, hereinafter called Plaintiff) loaned to the Defendant(s) the sum appearing on said Mortgage, which Mortgage was executed and delivered to Plaintiff as security for the indebtedness. Said Mortgage is incorporated herein by reference in accordance with Pa.R.C.P. 1019 (g).

The information regarding the Mortgage being foreclosed is as follows:

MORTGAGED PREMISES: 912 Clara Street
MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Houtzdale
COUNTY: Clearfield
DATE EXECUTED: 3/18/99
DATE RECORDED: 3/24/99 INSTRUMENT NO: 199904436

The legal description of the mortgaged premises is attached hereto and made part hereof.

4. Said Mortgage is in default because the required payments have not been made as set forth below, and by its terms, upon breach and failure to cure said breach after notice, all sums secured by said Mortgage, together with other charges authorized by

said Mortgage itemized below, shall be immediately due.

5. After demand, the Defendant(s) continues to fail or refuses to comply with the terms of the Mortgage as follows:

- (a) by failing or refusing to pay the installments of principal and interest when due in the amounts indicated below;
- (b) by failing or refusing to pay other charges, if any, indicated below.

6. The following amounts are due on the said Mortgage as of 9/15/08:

Principal of debt due	\$28,262.03
Unpaid Interest at 12.135% from 1/15/04 to 9/15/08 (the per diem interest accruing on this debt is \$9.40 and that sum should be added each day after 9/15/08)	15,718.92
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$15.05 should be added in accordance with the terms of the note each month after 9/15/08)	181.60
BPO	100.00
Attorneys Fees (anticipated and actual to 5% of principal)	<u>1,413.10</u>
TOTAL	\$46,280.65

7. The attorney's fee set forth above are in conformity with the mortgage documents and Pennsylvania law, and will be collected in the event of a third party purchaser at Sheriff's Sale. If the mortgage is reinstated prior to the sale, reasonable attorney's fees will be charged in accordance with the reduction provisions of Act 6, if applicable.

8. Notice of Intention to Foreclose under Act 6 of 1974 of

the Commonwealth of Pennsylvania has been sent to each Defendant, certified mail, in accordance with the requirements of that act, and copy(s) are attached hereto as Exhibit "A" and made part hereof.

WHEREFORE, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$46,280.65 plus interest, costs and attorneys fees as more fully set forth in the Complaint, and for foreclosure and sale of the Mortgaged premises.

UDREN LAW OFFICES, P.C.

BY Chandra Arkema

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

LOUIS A. SIMONI, ESQUIRE

ALL THAT CERTAIN PIECE, PARCEL OR LOT OF GROUND SITUATE IN THE BOROUGH OF HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS:

BOUNDED ON THE SOUTH BY CLARA STREET AND RUNNING WEST ALONG CLARA STREET FIFTY (50') FEET TO A POST ON LINE OF LOT NO. 611; THENCE NORTH ALONG THE LINE OF SAID LOT NO. 611, ONE HUNDRED FIFTY (150') FEET TO A POST ON BEAR ALLEY; THENCE EAST ALONG THE LINE OF BEAR AVENUE, FIFTY (50') FEET TO A POST ON LINE ALLEY; AND THENCE SOUTH ALONG THE LINE OF SAID ALLEY, ONE HUNDRED FIFTY (150') FEET TO A POST ON CLARE STREET, THE PLACE OF BEGINNING, AND KNOWN AS LOT NO. 609 IN THE GENERAL PLAN OF THE BOROUGH OF HOUTZDALE. HAVING THEREON ERECTED A ONE STORY, FRAME DWELLING HOUSE, BUNGALOW TYPE, AND OTHER OUT BUILDINGS. BEING FURTHER IDENTIFIED BY CLEARFIELD COUNTY MAP ASSESSMENT NUMBER 10-M14-397-00013.

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
SUITE 200

CHERRY HILL, NEW JERSEY 08003-3620
856. 669. 5400
FAX: 856. 669. 5399

Pennsylvania Office
(215) 568-9500

MARK J. UDREN*
STUART WINNEG**
LORRAINE DOYLE**
ALAN M. MINATO***
CHANDRA M. ARKEMA***
*ADMITTED NJ, PA, FL
**ADMITTED PA
***ADMITTED NJ, PA
TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

September 2 , 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
ARTICLE #7007 3020 0000 0779 5548
7007 3020 0000 0779 5531

Robert Phillips
Michelle E. Phillips

912 Clara Street
Houtzdale PA 16651

RE: Mortgage Loan dated March 18, 1999

Lender: Brown Bark II, L.P.

NOTICE OF INTENTION TO FORECLOSE

Dear Mortgagor:

The Mortgage serviced/held by Brown Bark II, L.P. (hereinafter we, us or ours) on your property located at 912 Clara Street Houtzdale, PA 16651 IS IN SERIOUS DEFAULT because you have not made the monthly payments of \$300.98 for the months of February 15, 2004 through August 15, 2008.

The last assessed late charge on this account was \$15.05 at a late charge rate of 5% for each delinquent payment(s). As of today, late charges have accrued to the total amount of \$181.60. Other charges including BPO fees & Taxes paid by lender have accrued at the total amount of \$770.32. The total amount now required to cure this default, or in other words, get caught up in your payments, as of the date of this letter is \$17505.82.

EXHIBIT A

You may cure this default within THIRTY (30) DAYS of the date of this letter, by paying to us the above amount of \$17505.82, plus any additional monthly payments and late charges which may fall due during this period. To confirm if any additional amounts are due, you may contact us at (856) 669-5400 or (215) 568-9500. All payments must be made either by cash, cashier's check, certified check or money order, and made to

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NEW JERSEY 08003-3620

If you do not cure the default within THIRTY (30) DAYS, we intend to exercise the lender's right to accelerate the mortgage payments. This means that whatever is owing on the original amount borrowed will be considered due immediately and you may lose the chance to pay off the original mortgage in monthly installments.

If full payment of the amount of default is not made within THIRTY (30) DAYS, the lender also intends to instruct our firm to start a lawsuit to foreclose your mortgaged property. If the mortgage is foreclosed your mortgaged property will be sold by the Sheriff or other similar official to pay off the mortgage debt. If you cure the default before we begin legal proceedings against you, you will still have to pay the reasonable attorney's fees actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay the reasonable attorney's fees even if they are over \$50.00. Any attorney's fees will be added to whatever you owe the lender, which may also include our reasonable costs. If you cure the default within the THIRTY (30) DAY period you will not be required to pay attorney's fees.

The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's or other similar official foreclosure sale. You may do so by paying the total amount of the unpaid monthly payments plus any late or other charges then due, as well as the reasonable attorney's fees and costs connected with the foreclosure sale and perform any other requirements under the mortgage. It is estimated that the earliest date that such a Sheriff's or other similar official's sale could be held would be approximately six months from the date of this letter. A notice of the date of the Sheriff's or similar official sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment will be by calling us at the following number: (856) 669-5400 extension 5644. This payment must be cash, cashier's check, certified check or money order and made payable to us at the address stated above.

You should realize that a Sheriff's or other similar official sale will end your ownership of the mortgaged property and your right to remain in it. If you continue to live in the property after the Sheriff's or other similar official sale, a lawsuit could be started to evict you.

You shall have the right to assert in the foreclosure proceedings, the non-existence of a default or any other defense that you may have to acceleration or foreclosure.

You have additional rights to help protect your interest in the property. YOU HAVE THE RIGHT TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT, OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT. YOU MAY HAVE THE RIGHT TO SELL OR TRANSFER THE PROPERTY SUBJECT TO THE MORTGAGE TO A BUYER OR TRANSFEREE WHO WILL ASSUME THE MORTGAGE DEBT, PROVIDED THAT ALL THE OUTSTANDING PAYMENTS, CHARGES AND ATTORNEY'S FEES AND COSTS ARE PAID PRIOR TO OR AT THE SALE, AND THAT THE OTHER REQUIREMENTS UNDER THE MORTGAGE ARE SATISFIED. CONTACT US TO DETERMINE UNDER WHAT CIRCUMSTANCES THIS RIGHT MIGHT EXIST. YOU HAVE THE RIGHT TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.

If you cure the default, the mortgage will be restored to the same position as if no default had occurred. However, you are not entitled to this right to cure your default more than three times in any calendar year.

UDREN LAW OFFICES, P.C.

BY: 

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

cc: First Class Mail

NOTICE

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If you notify us in writing within the 30 day period as stated above, we will cease collection of your debt, or any disputed portion of it, until we obtain the information that is required and mail it to you. Once we have mailed to you the required information, we will then continue the collection of your debt.

This law firm is deemed to be a debt collector and this Notice and the attached document is an attempt to collect a debt, and any information obtained will be used for that purpose.

**UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 669-5400**

UDREN LAW OFFICES, P.C.
 OODCREST CORPORATE CENT
 111 WOODCREST ROAD
 CHERRY HILL, NJ 08003

NRK 6332-11001

Michelle E. Phillips
912 Clara Street
Montgomery, AL 36105



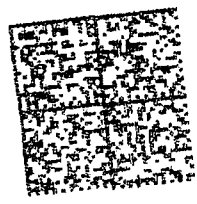
TESS 6220 0000 020E 2002
 TESS 6220 0000 020E 2002

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)
 For delivery information visit our website at www.usps.com
OFFICIAL USE

Postage	\$ 4.20
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32

Postmark
Here

Sent to *Michelle E. Phillips*
 Street, Apt. No. or PO Box No. *912 Clara St*
 City, State, Zip+4 *Montgomery AL 36105*
 PS Form 3800, August 2006 See Reverse for Instructions



Master

016H26519216
\$05.32
 09/02/2008
 Mailed From: 08003
 US POSTAGE

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- Certified Mail is NOT available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:
Michelle Z. Phillips

*912 Clara St
Huntsdale IL
16651*

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent ☐ Addressee

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

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

3. Service Type

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

4. Restricted Delivery? (Extra Fee) ☐ Yes ☒ No

2. Article Number *7007 3020 0000 0779 5531*

(Transfer from SL)

PS Form 3811, February 2004 Domestic Return Receipt

UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTR
111 WOODCREST ROAD
CHERRY HILL, NJ 08003.

NCAC1222.11.1

*Robert F Phillips
912 Clara Street
Hartford Ct 16651*



9455 6220 0000 020E 2002
9455 6220 0000 020E 2002

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

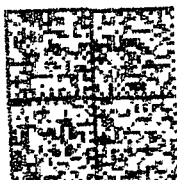
For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$ 4.2
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.32

Postmark
Here

Sent To Robert F Phillips
Street, Apt. No. or PO Box No. 912 Clara St
City, State, ZIP+4 Hartford Ct 16651
PS Form 3800, August 2005 See Reverse for Instructions



Hastler

016126519216
\$05.320
09/02/2008
Mailed From 08003
US POSTAGE

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

Important Reminders:

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- For an additional fee, delivery may be restricted to the addressee's authorized agent. Advise the clerk or mark the mailpiece with endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the receipt at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry

PS Form 3800, August 2006 (Reverse) PSN 7530-02-000-9047

SENDER: COMPLETE THIS SECTION

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

1. Article Addressed to:

Robert J. Phillips
912 Clare St
Kentwood La 70657

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type

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

4. Restricted Delivery? (Extra Fee)

☐ Yes

2. Article Number

(Transfer from service label)

7007 3020 0000 0779 5548

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

V E R I F I C A T I O N

The undersigned, hereby states that he/she is the attorney for the Plaintiff, a corporation unless designated otherwise; that he/she is authorized to take this Verification and does so because of the exigencies regarding this matter, and because Plaintiff must verify much of the information through agents, and because he/she has personal knowledge of some of the facts averred in the foregoing pleading; and that the statements made in the foregoing pleading are true and correct to the best of his/her knowledge, information and belief and the source of his information is public records and reports of Plaintiff's agents. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa.C.S. Section 4904 relating to unsworn falsification to authorities.

UDREN LAW OFFICES, P.C.

BY Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE
LOUIS A. SIMONI, ESQUIRE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104848
NO: 08-2046-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: BROWN BARK II, L.P.

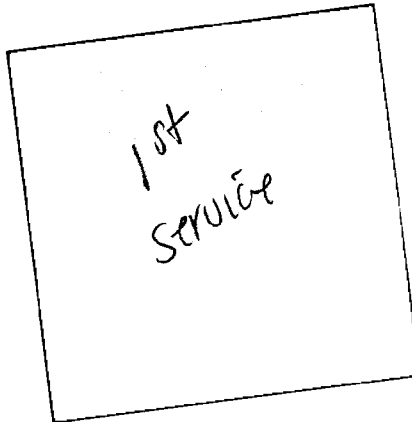
VS.

DEFENDANT: ROBERT F. PHILLIPS and MICHELLE E. PHILLIPS

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	121794	20.00
SHERIFF HAWKINS	UDREN	121794	80.00



FILED
03:45 PM
FEB 11 2009
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2009

So Answers,

A handwritten signature in cursive script, appearing to read "Chester A. Hawkins".

Chester A. Hawkins
Sheriff

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

Brown Bark II, L.P.
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.
Robert F. Phillips
Michelle E. Phillips
Defendant(s)

NO. 2008-2046-CD

PRAECIPE TO SUBSTITUTE VERIFICATION

TO THE PROTHONOTARY:

Kindly substitute the attached Verification for the Verification attached to the Complaint in Mortgage Foreclosure with regard to the captioned matter.

DATED: February 19, 2009

UDREN LAW OFFICES, P.C.

BY Chandra Arkema
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

FILED NO CC
mjm:04/20
FEB 23 2009 (6K)
§
William A. Shaw
Prothonotary/Clerk of Courts

V E R I F I C A T I O N

The undersigned, an Authorized Signatory which is the Plaintiff in the foregoing Complaint or an Authorized Signatory of the Corporation which is the servicing agent of Plaintiff, and being authorized to make this verification on behalf of the Plaintiff, hereby verifies that the facts set forth in the foregoing Complaint are taken from records maintained by persons supervised by the undersigned who maintain the business records of the mortgage held by Plaintiff in the ordinary course of business and that those facts are true and correct to the best of the knowledge, information and belief of the undersigned.

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

Date

October 30, 2008

Name:

James M. Hrebenc

Title:

Authorized Signatory

Company:

14348

Robert F. Phillips
Michelle E. Phillips
Loan #71411300
MJU #08080332-1

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
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WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

FILED *Any pd. 20.00*
MT 11:07/5/09
FEB 23 2009 Notice to Defs.

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County
MORTGAGE FORECLOSURE

William A. Shaw *Statement to*
Prothonotary/Clerk of Courts *Any*
(60)

v.

Robert F. Phillips
Michelle E. Phillips
912 Clara Street
Houtzdale, PA 16651
Defendant(s)

NO. 2008-2046-CD

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

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against the Defendant(s) **Robert F. Phillips and Michelle E. Phillips** for failure to file an Answer to Plaintiff's Complaint within 20 days from service thereof and for foreclosure and sale of the mortgaged premises, and assess Plaintiff's damages as follows:

As set forth in Complaint	\$46,280.65
Interest Per Complaint	1,475.80
From 9/16/08 to 2/19/09	
Late charges per Complaint	<u>75.25</u>
From 9/16/08 to 2/19/09	
TOTAL	<u>\$47,831.70</u>

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

UDREN LAW OFFICES, P.C.

BY *Chandra Arkema*
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

DAMAGES ARE HEREBY ASSESSED AS INDICATED

DATE: 2/23/09

William A. Shaw
PRO PROTHY

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
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856-669-5400
pleadings@udren.com

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION

Clearfield County

Robert F. Phillips
Michelle E. Phillips
912 Clara Street
Houtzdale, PA 16651
Defendant(s)

NO. 2008-2046-C

FILED

OCT 24 2008

William A. Shaw
Prothonotary/Clerk of Courts

COMPLAINT IN MORTGAGE FORECLOSURE

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

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

08080332-1mk
COPY

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
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CHERRY HILL, NJ 08003
856-669-5400
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

Brown Bark II, L.P.
Plaintiff

v.

Robert F. Phillips
Michelle E. Phillips
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2008-2046-CD

TO: Robert F. Phillips
5887 Glen Hope Blvd
Glen Hope, PA 16645

Date of Notice: January 6, 2009

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.


LAWYER REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

NOTIFICACION IMPORTANTE

USTED SE ENCUENTRA EN ESTADO DE REBELDIA POR NO HABER TOMADO LA ACCION REQUIRIDA DE SU PARTE EN ESTE CASO. AL NO TOMAR LA ACCION DEBIDA DENTRO DE UN TERMINO DE DIEZ (10) DIAS DE ESTA NOTIFICACION, EL TRIBUNAL PODRA, SIN NECESIDAD DE COMPARARECER USTED EN CORTE O ESCUCHAR PREUBA ALGUNA, DICTAR SENTENCIA EN SU CONTRA, USTED PUEDE PERDER BIENES Y OTROS DERECHOS, IMPORTANTES. DEBE LLEVAR ESTA NOTIFICACION A UN ABOGADO INMEDIATAMENTE SI USTED NO TIENE ABOGADO, O SI NO TIENE DINERO SUFICIENTE PARA TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA, CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL
LAWYER REFERRAL SERVICE
David S. Meholick
Court Administrator
Clearfield Count Courthouse
Clearfield, PA 16830
814-765-2641 x 5982

NOTICE: PURSUANT TO THE FAIR DEBT COLLECTION PRACTICES ACT, THIS LAW FIRM IS DEEMED TO BE A DEBT COLLECTOR AND THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.


Mark J. Udren, Esquire
Stuart Winneg, Esquire
Lorraine Doyle, Esquire
Alan M. Minato, Esquire
Chandra M. Arkema, Esquire
Louis A. Simoni, Esquire
Woodcrest Corporate Center
111 Woodcrest Road, Suite 200
Cherry Hill, New Jersey 08003-3620

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
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LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003
856-669-5400
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

Brown Bark II, L.P.
Plaintiff

v.

Robert F. Phillips
Michelle E. Phillips
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2008-2046-CD

TO: Michelle E. Phillips
5887 Glen Hope Blvd
Glen Hope, PA 16645

Date of Notice: January 6, 2009

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

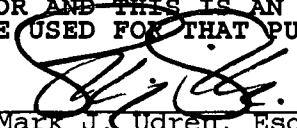
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Cherry Hill, New Jersey 08003-3620

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ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
LOUIS A. SIMONI, ESQUIRE - ID #200869
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-482-6900

ATTORNEY FOR PLAINTIFF

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

v.
Robert F. Phillips
Michelle E. Phillips
912 Clara Street
Houtzdale, PA 16651
Defendant(s)

NO. 2008-2046-CD

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF :
COUNTY OF : SS

THE UNDERSIGNED being duly sworn, deposes and says that the averments herein are based upon investigations made and records maintained by us either as Plaintiff or as servicing agent of the Plaintiff herein and that the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended, and that the age and last known residence and employment of each Defendant are as follows:

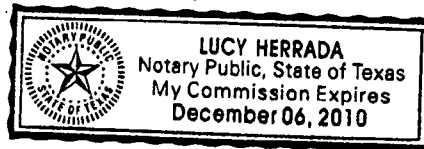
Defendant: Robert F. Phillips
Age: Over 18
Residence: As captioned above
Employment: Unknown

Defendant: Michelle E. Phillips
Age: Over 18
Residence: As captioned above
Employment: Unknown

Sworn to and subscribed
before me this 30 day
of October, 2008.

Lucy Herrada
Notary Public

Name: *James M. HERRADA*
Title: *AUTHORIZED SIGNATORY*
Company: *10/30/2008*



UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
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WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

Copy

Brown Bark II, L.P.
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

Robert F. Phillips
Michelle E. Phillips
Defendant(s)

NO. 2008-2046-CD

TO: Robert F. Phillips
5887 Glen Hope Blvd.
Glen Hope, PA 16645

NOTICE

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 *[Signature]* 2/23/09

- ☒ Judgment by Default
- ☐ Money Judgment
- ☐ Judgment in Replevin
- ☐ Judgment for Possession
- ☐ Judgment on Award of Arbitration
- ☐ Judgment on Verdict
- ☐ Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-669-5400

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
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111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

pleadings@udren.com

Brown Bark II, L.P.
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

Robert F. Phillips
Michelle E. Phillips
Defendant(s)

NO. 2008-2046-CD

TO: Michelle E. Phillips
5887 Glen Hope Blvd.
Glen Hope, PA 16645

NOTICE

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

- ☒ Judgment by Default
☐ Money Judgment
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☐ Judgment on Verdict
☐ Judgment on Court Findings

IF YOU HAVE ANY QUESTIONS CONCERNING THIS NOTICE PLEASE CALL:

ATTORNEY Mark J. Udren, Esquire

At this telephone number: 856-669-5400

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

Brown Bark II, L.P.
Plaintiff(s)

No.: 2008-02046-CD

Real Debt: \$47,831.70

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Robert F. Phillips
Michelle E. Phillips
Defendant(s)

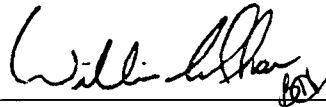
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: February 23, 2009

Expires: February 23, 2014

Certified from the record this 23rd day of February, 2009.



William A. Shaw, Prothonotary

SIGN BELOW FOR SATISFACTION

Received on _____, _____, of defendant full satisfaction of this Judgment,
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

Plaintiff/Attorney

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
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CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

Brown Bark II, L.P.
Plaintiff
v.

Robert F. Phillips
Michelle E. Phillips
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 2008-2046-CD

PRAECIPE FOR WRIT OF EXECUTION

TO THE PROTHONOTARY:

Please issue Writ of Execution in the above matter:

Amount due

Prothonotary costs \$47,831.70
142.00

Interest From 2/20/09

to Date of Sale _____

Ongoing Per Diem of \$9.40

to actual date of sale including if sale is
held at a later date

(Costs to be added)

\$ _____

UDREN LAW OFFICES, P.C.

BY Chandra Arkema
Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

FILED
FEB 23 2009
Atty pd. 20.00
ICC 06 w/NTS
w/prop. desc. to Shff
William A. Shaw
Prothonotary/Clerk of Courts
(66)

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
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Brown Bark II, L.P.
Plaintiff
v.

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

Robert F. Phillips
Michelle E. Phillips
Defendant(s)

NO. 2008-2046-CD


C E R T I F I C A T E

I hereby state that as the attorney for the Plaintiff in the above-captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

- () An FHA insured mortgage
- () Non-owner occupied
- () Vacant
- (X) Act 91 procedures have been fulfilled.
- () Over 24 months delinquent.

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

UDREN LAW OFFICES, P.C.

BY 
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302

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LORRAINE DOYLE, ESQUIRE - ID #34576

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CHANDRA M. ARKEMA, ESQUIRE - ID #203437

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400

pleadings@udren.com

Brown Bark II, L.P.

Plaintiff

v.

Robert F. Phillips

Michelle E. Phillips

Defendant(s)

COURT OF COMMON PLEAS

CIVIL DIVISION

Clearfield County

MORTGAGE FORECLOSURE

NO. 2008-2046-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

Brown Bark II, L.P. , Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at: 912 Clara Street, Houtzdale, PA 16651

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

Name

Address

Robert F. Phillips

5887 Glen Hope Blvd.

Glen Hope, PA 16645

Michelle E. Phillips

5887 Glen Hope Blvd.

Glen Hope, PA 16645

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

Name

Address

SAME AS #1 ABOVE

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

Name

Address

None

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

Name

Address

Brown Bark II, L.P.

4100 Greenbriar, Suite 180

Stafford, TX 77477

PHFA

211 North Front St.

Harrisburg, PA 17101

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

Name

Address

None

6. Name and address of every other person who has any record interest in the property and whose interest may be affected by the sale:

Name

Address

Real Estate Tax Dept.

1 North Second St., Suite 116
Clearfield, PA 16830

Domestic Relations Section

1 North Second St., Suite 116
Clearfield, PA 16830

Commonwealth of PA,
Department of Revenue

Bureau of Compliance, PO Box 281230
Harrisburg, PA 17128-1230

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

Name

Address

Tenants/Occupants

912 Clara Street
Houtzdale, PA 16651

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

DATED: February 19, 2009

UDREN LAW OFFICES, P.C.

BY 
Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302

STUART WINNEG, ESQUIRE - ID #45362

LORRAINE DOYLE, ESQUIRE - ID #34576

ALAN M. MINATO, ESQUIRE - ID #75860

CHANDRA M. ARKEMA, ESQUIRE - ID #203437

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400

pleadings@udren.com

Brown Bark II, L.P.
Plaintiff

v.

Robert F. Phillips
Michelle E. Phillips
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 2008-2046-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

To satisfy the judgment, interest and costs in the above
matter, you are directed to levy upon and sell the following
described property:

912 Clara Street
Houtzdale, PA 16651
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$47,831.70

Interest From 2/20/09
to Date of Sale _____
Ongoing Per Diem of \$9.40
to actual date of sale including if sale is
held at a later date

(Costs to be added) \$ _____

Prothonotary costs 142.00
Prothonotary

By _____

Clerk William L. [Signature]
BT

Date 2/23/09

COURT OF COMMON PLEAS
NO. 2008-2046-CD

Brown Bark II, L.P.

vs.

Robert F. Phillips
Michelle E. Phillips

WRIT OF EXECUTION

REAL DEBT \$ 47,831.70

INTEREST \$ _____

from 2/20/09

to Date of Sale _____

Ongoing Per Diem of \$9.40

to actual date of sale including if sale is
held at a later date

COSTS PAID:

PROTHY \$ 142.00

SHERIFF \$ _____

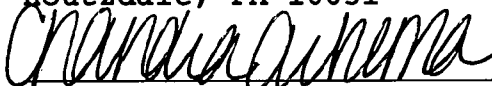
STATUTORY \$ _____

COSTS DUE PROTHY. \$ _____

PREMISES TO BE SOLD:

912 Clara Street

Houtzdale, PA 16651



UDREN LAW OFFICES, P.C.

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

(856) 669-5400

pleadings@udren.com

**ALL THAT CERTAIN PIECE, PARCEL OR LOT OF GROUND SITUATE IN THE
BOROUGH OF HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA,
BOUNDED AND DESCRIBED AS FOLLOWS:**

**BOUNDED ON THE SOUTH BY CLARA STREET AND RUNNING WEST ALONG
CLARA STREET FIFTY (50') FEET TO A POST ON LINE OF LOT NO. 611; THENCE
NORTH ALONG THE LINE OF SAID LOT NO. 611, ONE HUNDRED FIFTY (150')
FEET TO A POST ON BEAR ALLEY; THENCE EAST ALONG THE LINE OF BEAR
AVENUE, FIFTY (50') FEET TO A POST ON LINE ALLEY; AND THENCE SOUTH
ALONG THE LINE OF SAID ALLEY, ONE HUNDRED FIFTY (150') FEET TO A
POST ON CLARE STREET, THE PLACE OF BEGINNING, AND KNOWN AS LOT
NO. 609 IN THE GENERAL PLAN OF THE BOROUGH OF HOUTZDALE. HAVING
THEREON ERECTED A ONE STORY, FRAME DWELLING HOUSE, BUNGALOW
TYPE, AND OTHER OUT BUILDINGS. BEING FURTHER IDENTIFIED BY
CLEARFIELD COUNTY MAP ASSESSMENT NUMBER 10-M14-397-00013.**

BEING KNOWN AS: 912 Clara Street, Houtzdale, PA 16651

PROPERTY ID NO.: 10-M14-397-13

TITLE TO SAID PREMISES IS VESTED IN ROBERT F. PHILLIPS AND MICHELLE
E. PHILLIPS, HIS WIFE, AS TENANTS BY THE ENTIRETIES BY DEED FROM
JOSEPH TUORINSKY AND MARY TUORINSKY, HIS WIFE DATED 9/30/1997
RECORDED 9/30/1997 IN DEED BOOK 1876 PAGE 143.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 105047
NO: 08-2046-CD
SERVICES 4
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: BROWN BARK II, L.P.
vs.
DEFENDANT: ROBERT F. PHILLIPS & MICHELLE E. PHILLIPS

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	124235	40.00
SHERIFF HAWKINS	UDREN	124235	60.00

SHERIFF
0/3:35pm
MAR 25 2009
William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2009

So Answers,

Chester A. Hawkins

Chester A. Hawkins
Sheriff

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2008-2046-CD

v.
Robert F. Phillips
Michelle E. Phillips
5887 Glen Hope Blvd.
Glen Hope, PA 16645
Defendant(s)

PRAECIPE TO FILE PROOF OF SERVICE

TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to
the captioned matter.

Date: May 6, 2009

UDREN LAW OFFICES, P.C.

BY: _____

Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

5
FILED
m/12:51
MAY 12 2009
William A. Shaw
Prothonotary/Clerk of Courts

Brown Bark II, LP, et. al., Plaintiff(s)
vs.
Robert F. Phillips, et. al., Defendant(s)



Service of Process by
APS International, Ltd.
1-800-328-7171

APS International Plaza
7800 Glenroy Rd.
Minneapolis, MN 55439-3122

APS File #: 096483-0001

AFFIDAVIT OF SERVICE -- Individual

UDREN LAW OFFICES
Ms Jessica Donahue
111 Woodcrest Rd, Ste 200
Cherry Hill, NJ 08003-3620

Service of Process on:

--Robert F. Phillips
Court Case No. 2008-2046-CD

State of: PA) ss.

County of: BLAIR

Name of Server: D.M. ELLIS, undersigned, being duly sworn, deposes and says
that at the time of service, s/he was of legal age and was not a party to this action:

Date/Time of Service: that on the 5th day of MAY, 2009, at 8:05 o'clock AM

Place of Service: at 5887 Glen Hope Blvd in Glen Hope, PA 16645

Documents Served: the undersigned served the documents described as:
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:
Robert F. Phillips

Person Served, and
Method of Service:

- ☐ By personally delivering them into the hands of the person to be served.
☒ By delivering them into the hands of MICHELLE / WIFE, a person
of suitable age, who verified, or who upon questioning stated, that he/she resides with
Robert F. Phillips
at the place of service, and whose relationship to the person is: _____

Description of Person
Receiving Documents: The person receiving documents is described as follows:
Sex F; Skin Color Cauc; Hair Color BLONDE; Facial Hair N/A
Approx. Age 35; Approx. Height 5'2"; Approx. Weight 150 LBS
☒ To the best of my knowledge and belief, said person was not engaged in the US Military at
the time of service.

Signature of Server: Undersigned declares under penalty of perjury
that the foregoing is true and correct.

Dm Ellis
Signature of Server

APS International, Ltd..

Subscribed and sworn to before me this

5th day of May, 2009

Monica Crilly
Notary Public (Commission Expires)

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Monica Crilly, Notary Public
City Of Altoona, Blair County
My Commission Expires Aug. 27, 2009

Member, Pennsylvania Association of Notaries

Brown Bank PA, L.P., et al., Plaintiff(s)
vs.
Robert F. Phillips, et al., Defendant(s)



Service of Process by
APS International, Ltd.
1-800-328-7171

APS International Plaza
7800 Glenroy Rd.
Minneapolis, MN 55439-3122

APS File #: 096483-0001

AFFIDAVIT OF SERVICE -- Individual

UDREN LAW OFFICES
Ms Jessica Donahue
111 Woodcrest Rd, Ste 200
Cherry Hill, NJ 08003-3620

Service of Process on:

—Michelle E. Phillips
Court Case No. 2008-2046-CD

State of: PA ss.

County of: BLAIR

Name of Server: D.M. Ellis, undersigned, being duly sworn, deposes and says
that at the time of service, s/he was of legal age and was not a party to this action:

Date/Time of Service: that on the 5th day of MAY, 2009, at 8:05 o'clock AM

Place of Service: at 5887 Glen Hope Blvd, in Glen Hope, PA 16645

Documents Served: the undersigned served the documents described as:
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:
Michelle E. Phillips

Person Served, and
Method of Service: ☒ By personally delivering them into the hands of the person to be served.
☐ By delivering them into the hands of _____, a person
of suitable age, who verified, or who upon questioning stated, that he/she resides with
Michelle E. Phillips
at the place of service, and whose relationship to the person is: _____

Description of Person
Receiving Documents: The person receiving documents is described as follows:
Sex F; Skin Color Cauc; Hair Color BONDE; Facial Hair N/A
Approx. Age 35; Approx. Height 5'2"; Approx. Weight 150 LBS
☒ To the best of my knowledge and belief, said person was not engaged in the US Military at
the time of service.

Signature of Server: Undersigned declares under penalty of perjury
that the foregoing is true and correct.
D.M. Ellis
Signature of Server

Subscribed and sworn to before me this
5th day of MAY, 2009
Monica Grilly
Notary Public (Commission Expires)

APS International, Ltd.

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Monica Grilly, Notary Public
City Of Altoona, Blair County
My Commission Expires Aug. 27, 2009
Member, Pennsylvania Association of Notaries

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

ATTORNEY FOR PLAINTIFF

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

v.

Robert F. Phillips
Michelle E. Phillips
5887 Glen Hope Blvd.
Glen Hope, PA 16645
Defendant(s)

NO. 2008-2046-CD

S FILED *No CC.*
M/12:05pm
MAY 14 2009

William A. Shaw
Prothonotary/Clerk of Courts

AFFIDAVIT OF SERVICE PURSUANT TO Pa.R.C.P. RULE 3129.1

Plaintiff, by its/his/her Attorney hereby verifies that:

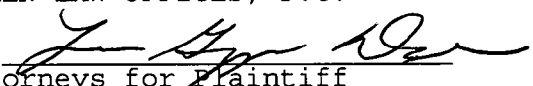
1. A copy of the Notice of Sheriff's Sale, a true and correct copy of which is attached hereto as Exhibit "A", was sent to every recorded lienholder and every other interested party known as of the date of the filing of the Praecipe for the Writ of Execution, on the date(s) appearing on the attached Certificates of Mailing.
2. A Notice of Sheriff's Sale was sent to Defendant(s) by regular mail and certified mail on the date appearing on the attached Return Receipt, which was signed for by Defendant(s) on the date specified on the said Return Receipt. Copies of the said Notice and Return Receipt are attached hereto as Exhibit "B".
3. If a Return Receipt is not attached hereto, then service was by personal service on the date specified on the attached Return of Service, attached hereto as Exhibit "B".
4. If service was by Order of Court, then proof of compliance with said Order is attached hereto as Exhibit "B".

All Notices were served within the time limits set forth by Pa Rule C.P. 3129.

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

Dated: May 8, 2009

UDREN LAW OFFICES, P.C.

BY: 
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302

STUART WINNEG, ESQUIRE - ID #45362

LORRAINE DOYLE, ESQUIRE - ID #34576

ALAN M. MINATO, ESQUIRE - ID #75860

CHANDRA M. ARKEMA, ESQUIRE - ID #203437

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400

Brown Bark II, L.P.
Plaintiff

v.
Robert F. Phillips
Michelle E. Phillips
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2008-2046-CD

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

**NOTICE OF SHERIFF'S SALE
OF REAL PROPERTY**

**OWNER(S): Robert F. Phillips
Michelle E. Phillips**

**PROPERTY: 912 Clara Street
Houtzdale, PA 16651**

Improvements: RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the **Clearfield** County Sheriff's Sale on **June 5, 2009**, at 10:00 A.M., at the Clearfield County Courthouse, 1 North Second Street, Suite 116, Clearfield, PA. Our records indicate that you may hold a mortgage or judgment on the property which will be extinguished by the sale. You may wish to attend the sale to protect your interests.

A Schedule of Distribution will be filed by the Sheriff on a date specified by the Sheriff not later than 30 days after sale. Distribution will be made in accordance with the schedule unless exceptions are filed thereto within 10 days after the filing of the schedule.

EXHIBIT A

Name and Address Of Sender
UDREN LAW OFFICES, P.C.
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003

ATTN: Jessica Donahue

☐ Registered
☐ Insured
☐ COD
☐ Certified

☐ Return Receipt for Merchandise
☐ Int'l Recorded Del.
☐ Express Mail

Check appropriate block for Registered Mail:
☐ With Postal Insurance
☐ Without postal insurance

Affix stamp here if issued as certificate of mailing or for additional copies of this bill.

Postmark and Date of Receipt

Line	Article Number	Name of Addressee, Street, and Post Office Address	Postage	Fee	Handling Charge	Act. Value (If Regis.)	Insured Value	Due Sender If COD	R.R. Fee	S.D. Fee	S.H. Fee	Rst. Del. Fee
1		COMMONWEALTH OF PA, DEPT. OF REVENUE, BUREAU OF COMPLIANCE PO Box 281230, Department of Revenue Harrisburg, PA 17128-1230										
2		TENANTS/OCCUPANTS 912 Clara Street Houtzdale, PA 16651										
3		Brown Bark II, L.P. 4100 Greenbriar, Suite 180 Stafford, TX 77477										
4		PHFA 211 North Front St. Harrisburg, PA 17101										
5		Real Estate Tax Dept. 1 North Second St., Suite 116 Clearfield, PA 16830										
6		Domestic Relations Section 1 North Second St., Suite 116 Clearfield, PA 16830										
7												
8												
9												
10												
11												
12												
13												
14												
15												
Total number of Pieces Listed by Sender 6		Total Number of Pieces Received at Post Office 10	Postmaster Per (Name of Receiving Employee) <i>CH</i>		The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on insured and COD mail. See International Mail Manual for limitations of coverage on international mail. Special handling charges apply only to third and fourth class parcels.							

016H26519216

\$03.800

05/04/2009

Mailed From 08003

US POSTAGE

16830

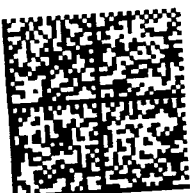


EXHIBIT A



PS Form 3877, February 1994

Form Must be Completed by Typewriter, Ink or Ball Point Pen

Robert F. Phillips
 Michelle E. Phillips; #08080332-1 (Clearfield)

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

Brown Bark II, L.P.
4100 Greenbriar
Suite 180
Stafford, TX 77477
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

NO. 2008-2046-CD

v.
Robert F. Phillips
Michelle E. Phillips
5887 Glen Hope Blvd.
Glen Hope, PA 16645
Defendant(s)

PRAECIPE TO FILE PROOF OF SERVICE

TO THE PROTHONOTARY:

Kindly file the attached Proofs of Service with regard to
the captioned matter.

Date: May 6, 2009

UDREN LAW OFFICES, P.C.

BY: _____
Attorneys for Plaintiff
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE

EXHIBIT B

Brown Bark II, LP, et al, Plaintiff(s)
vs.
Robert F. Phillips, et al., Defendant(s)



Service of Process by
APS International, Ltd.
1-800-328-7171

APS International Plaza
7800 Glenroy Rd.
Minneapolis, MN 55439-3122

APS File #: 096483-0001

AFFIDAVIT OF SERVICE -- Individual

UDREN LAW OFFICES
Ms Jessica Donahue
111 Woodcrest Rd, Ste 200
Cherry Hill, NJ 08003-3620

Service of Process on:

--Robert F. Phillips
Court Case No. 2008-2046-CD

State of: PA ss.

County of: BLAIR

Name of Server: D. M. ELLIS, undersigned, being duly sworn, deposes and says
that at the time of service, s/he was of legal age and was not a party to this action:

Date/Time of Service: that on the 5th day of MAY, 2009, at 8:05 o'clock AM

Place of Service: at 5887 Glen Hope Blvd in Glen Hope, PA 16645

Documents Served: the undersigned served the documents described as:
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:
Robert F. Phillips

Person Served, and
Method of Service: ☐ By personally delivering them into the hands of the person to be served.
☒ By delivering them into the hands of MICHELLE / WIFE, a person
of suitable age, who verified, or who upon questioning stated, that he/she resides with
Robert F. Phillips
at the place of service, and whose relationship to the person is: _____

Description of Person
Receiving Documents: The person receiving documents is described as follows:
Sex F; Skin Color Cauc; Hair Color BLONDE; Facial Hair N/A
Approx. Age 35; Approx. Height 5'2"; Approx. Weight 150 LBS
☒ To the best of my knowledge and belief, said person was not engaged in the US Military at
the time of service.

Signature of Server: Undersigned declares under penalty of perjury
that the foregoing is true and correct.

D. M. Ellis
Signature of Server

APS International, Ltd.

Subscribed and sworn to before me this

5th day of May, 2009

Monica Crilly
Notary Public (Commission Expires)

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Monica Crilly, Notary Public
City Of Altoona, Blair County
My Commission Expires Aug. 27, 2009

Member, Pennsylvania Association of Notaries

EXHIBIT B

Brown Bark H, L.P., et. al., Plaintiff(s)
vs.
Robert F. Phillips, et. al., Defendant(s)



Service of Process by
APS International, Ltd.
1-800-328-7171

APS International Plaza
7800 Glenroy Rd.
Minneapolis, MN 55439-3122

APS File #: 096483.0001

AFFIDAVIT OF SERVICE -- Individual

UDREN LAW OFFICES
Ms Jessica Donahue
111 Woodcrest Rd, Ste 200
Cherry Hill, NJ 08003-3620

Service of Process on:

--Michelle E. Phillips
Court Case No. 2008-2046-CD

State of: PA ss.

County of: BLAIR

Name of Server: D.M. ELLIS, undersigned, being duly sworn, deposes and says
that at the time of service, s/he was of legal age and was not a party to this action:

Date/Time of Service: that on the 5th day of MAY, 20 09, at 8:05 o'clock AM

Place of Service: at 5887 Glen Hope Blvd, in Glen Hope, PA 16645

Documents Served: the undersigned served the documents described as:
Notice of Sheriff's Sale of Real Property

Service of Process on: A true and correct copy of the aforesaid document(s) was served on:
Michelle E. Phillips

Person Served, and
Method of Service: ☒ By personally delivering them into the hands of the person to be served.
☐ By delivering them into the hands of _____, a person
of suitable age, who verified, or who upon questioning stated, that he/she resides with
Michelle E. Phillips
at the place of service, and whose relationship to the person is: _____

Description of Person
Receiving Documents: The person receiving documents is described as follows:
Sex F; Skin Color Cauc.; Hair Color BLONDE; Facial Hair N/A
Approx. Age 35; Approx. Height 5'2"; Approx. Weight 150 LBS
☒ To the best of my knowledge and belief, said person was not engaged in the US Military at
the time of service.

Signature of Server: Undersigned declares under penalty of perjury
that the foregoing is true and correct.

Subscribed and sworn to before me this

5th day of MAY, 20 09

D.M. Ellis
Signature of Server

Notary Public

(Commission Expires)

APS International, Ltd.

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Monica Chilly, Notary Public
City Of Altoona, Blair County
My Commission Expires Aug. 27, 2009
Member, Pennsylvania Association of Notaries

EXHIBIT B

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20935
NO: 08-2046-CD

PLAINTIFF: BROWN BARK II, L.P.
vs.
DEFENDANT: ROBERT F. PHILLIPS AND MICHELLE E. PHILLIPS

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 2/23/2009

LEVY TAKEN 3/5/2009 @ 1:53 PM

POSTED 3/5/2009 @ 1:53 PM

SALE HELD 6/5/2009

SOLD TO BROWN BARK II, L.P.

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 6/30/2009

DATE DEED FILED 6/30/2009

PROPERTY ADDRESS 912 CLARA STREET HOUTZDALE , PA 16651

FILED
0135724
JUN 30 2009
William A. Shaw
Prothonotary/Clerk of Courts

SERVICES

3/5/2009 @ 2:20 PM SERVED ROBERT F. PHILLIPS

SERVED ROBERT F. PHILLIPS, DEFENDANT, AT HIS RESIDENCE 5887 GLEN HOPE BLVD., GLEN HOPE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ROBERT PHILLIPS

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.

3/5/2009 @ 2:20 PM SERVED MICHELLE E. PHILLIPS

SERVED MICHELLE E. PHILLIPS, DEFENDANT, AT HER RESIDENCE 5887 GLEN HOPE BLVD., GLEN HOPE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ROBERT PHILLIPS, HUSBAND/CO-DEFENDANT

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

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20935
NO: 08-2046-CD

PLAINTIFF: BROWN BARK II, L.P.
vs.
DEFENDANT: ROBERT F. PHILLIPS AND MICHELLE E. PHILLIPS

Execution REAL ESTATE

SHERIFF RETURN



SHERIFF HAWKINS \$246.14

SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE - ID #04302
STUART WINNEG, ESQUIRE - ID #45362
LORRAINE DOYLE, ESQUIRE - ID #34576
ALAN M. MINATO, ESQUIRE - ID #75860
CHANDRA M. ARKEMA, ESQUIRE - ID #203437
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

Brown Bark II, L.P.
Plaintiff

v.

Robert F. Phillips
Michelle E. Phillips
Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Clearfield County

MORTGAGE FORECLOSURE

NO. 2008-2046-CD

WRIT OF EXECUTION

TO THE SHERIFF OF Clearfield COUNTY:

To satisfy the judgment, interest and costs in the above
matter, you are directed to levy upon and sell the following
described property:

912 Clara Street
Houtzdale, PA 16651
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$47,831.70

Interest From 2/20/09
to Date of Sale _____
Ongoing Per Diem of \$9.40
to actual date of sale including if sale is
held at a later date

(Costs to be added) \$ _____

Prothonotary costs 142.00

Prothonotary

By _____

Clerk

Date 2/23/09

Received this writ this 23rd day
of February A.D. 2009
At 3:00 A.M./P.M.

Charles A. Hankins
Sheriff by Cynthia B. Baker - Cuyahoga

COURT OF COMMON PLEAS
NO. 2008-2046-CD

=====

Brown Bark II, L.P.
vs.
Robert F. Phillips
Michelle E. Phillips

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 47,831.70

INTEREST \$ _____
from 2/20/09
to Date of Sale _____
Ongoing Per Diem of \$9.40
to actual date of sale including if sale is
held at a later date

COSTS PAID:

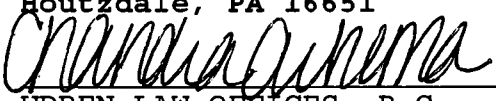
PROTHY \$ 142.00

SHERIFF \$ _____

STATUTORY \$ _____

COSTS DUE PROTHY. \$ _____

PREMISES TO BE SOLD:
912 Clara Street
Houtzdale, PA 16651


UDREN LAW OFFICES, P.C.
MARK J. UDREN, ESQUIRE
STUART WINNEG, ESQUIRE
LORRAINE DOYLE, ESQUIRE
ALAN M. MINATO, ESQUIRE
CHANDRA M. ARKEMA, ESQUIRE
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
(856) 669-5400
pleadings@udren.com

**ALL THAT CERTAIN PIECE, PARCEL OR LOT OF GROUND SITUATE IN THE
BOROUGH OF HOUTZDALE, CLEARFIELD COUNTY, PENNSYLVANIA,
BOUNDED AND DESCRIBED AS FOLLOWS:**

**BOUNDED ON THE SOUTH BY CLARA STREET AND RUNNING WEST ALONG
CLARA STREET FIFTY (50') FEET TO A POST ON LINE OF LOT NO. 611; THENCE
NORTH ALONG THE LINE OF SAID LOT NO. 611, ONE HUNDRED FIFTY (150')
FEET TO A POST ON BEAR ALLEY; THENCE EAST ALONG THE LINE OF BEAR
AVENUE, FIFTY (50') FEET TO A POST ON LINE ALLEY; AND THENCE SOUTH
ALONG THE LINE OF SAID ALLEY, ONE HUNDRED FIFTY (150') FEET TO A
POST ON CLARE STREET, THE PLACE OF BEGINNING, AND KNOWN AS LOT
NO. 609 IN THE GENERAL PLAN OF THE BOROUGH OF HOUTZDALE. HAVING
THEREON ERECTED A ONE STORY, FRAME DWELLING HOUSE, BUNGALOW
TYPE, AND OTHER OUT BUILDINGS. BEING FURTHER IDENTIFIED BY
CLEARFIELD COUNTY MAP ASSESSMENT NUMBER 10-M14-397-00013.**

BEING KNOWN AS: 912 Clara Street, Houtzdale, PA 16651

PROPERTY ID NO.: 10-M14-397-13

TITLE TO SAID PREMISES IS VESTED IN ROBERT F. PHILLIPS AND MICHELLE
E. PHILLIPS, HIS WIFE, AS TENANTS BY THE ENTIRETIES BY DEED FROM
JOSEPH TUORINSKY AND MARY TUORINSKY, HIS WIFE DATED 9/30/1997
RECORDED 9/30/1997 IN DEED BOOK 1876 PAGE 143.

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME ROBERT F. PHILLIPS

NO. 08-2046-CD

NOW, June 30, 2009, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on June 05, 2009, I exposed the within described real estate of Robert F. Phillips And Michelle E. Phillips to public venue or outcry at which time and place I sold the same to BROWN BARK II, L.P. 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	25.30
LEVY	15.00
MILEAGE	19.80
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	5.04
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	
TOTAL SHERIFF COSTS	\$246.14

DEED COSTS:

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

PLAINTIFF COSTS, DEBT AND INTEREST:

DEBT-AMOUNT DUE	47,831.70
INTEREST @ 9.4000 %	987.00
FROM 02/20/2009 TO 06/05/2009	

PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	40.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	

TOTAL DEBT AND INTEREST	\$48,858.70
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COSTS:

ADVERTISING	397.00
TAXES - COLLECTOR	158.88
TAXES - TAX CLAIM	1,292.00
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	28.50
SHERIFF COSTS	246.14
LEGAL JOURNAL COSTS	270.00
PROTHONOTARY	142.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	

TOTAL COSTS	\$2,679.52
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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