

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
MICHELE M. BRADFORD, ESQ., Id. No. 69849
JUDITH T. ROMANO, ESQ., Id. No. 58745
SHEETAL SHAH-JANI, ESQ., Id. No. 81760
JENINE R. DAVEY, ESQ., Id. No. 87077
LAUREN R. TABAS, ESQ., Id. No. 93337
VIVEK SRIVASTAVA, ESQ., Id. No. 202331
JAY B. JONES, ESQ., Id. No. 86657
PETER MULCAHY, ESQ., Id. No. 61791
ANDREW SPIVACK, ESQ., Id. No. 84439
JAIME MCGUINNESS, ESQ., Id. No. 90134
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000 185611

Plaintiff

v.

MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

Defendants

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

5 FILED \$95.00 Atty
11:50 am acc snff
OCT 24 2008
William A. Shah
Prothonotary/Clerk of Courts

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 2008-2049-CD

CLEARFIELD COUNTY

NOTICE

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

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

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

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

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

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

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

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

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

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

1. Plaintiff is

LASALLE BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR THE C-BASS MORTGAGE
LOAN ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2
4828 LOOP CENTRAL DRIVE
HOUSTON, TX 77081-2226

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

MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

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

3. On 03/27/2006 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to HOME123 CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200604827. The PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same. The mortgage and assignment(s), if any, are matters of public record and are incorporated herein by reference in accordance with Pa.R.C.P. 1019(g); which Rule relieves the Plaintiff from its obligations to attach documents to pleadings if those documents are of public record.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 04/01/2008 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$186,058.07
Interest	\$10,586.16
03/01/2008 through 10/21/2008	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$307.69
03/27/2006 to 10/21/2008	
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$198,751.92
Escrow	
Credit	\$0.00
Deficit	\$322.75
Subtotal	<u>\$322.75</u>
TOTAL	\$199,074.67

7. If the mortgage is reinstated prior to a Sheriff's Sale, the attorney's fee set forth above may be less than the amount demanded based on work actually performed. The attorney's fees requested are in conformity with the mortgage and Pennsylvania law. Plaintiff reserves its right to collect attorney's fees up to 5% of the remaining principal balance in the event the property is sold to a third party purchaser at Sheriff's Sale, or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.
8. Plaintiff is not seeking a judgment of personal liability (or an in personam judgment) against the Defendant(s) in the Action; however, Plaintiff reserves its right to bring a separate Action to establish that right, if such right exists. If Defendant(s) has/have received a discharge of personal liability in a bankruptcy proceeding, this Action of Mortgage Foreclosure is in no way an attempt to reestablish such personal liability discharged in bankruptcy, but only to foreclose the mortgage and sell the mortgaged premises pursuant to Pennsylvania Law.

9. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$199,074.67, together with interest from 10/21/2008 at the rate of \$45.24 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By: 

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE 

DANIEL G. SCHMIEG, ESQUIRE

MICHELE M. BRADFORD, ESQUIRE

JUDITH T. ROMANO, ESQUIRE

SHEETAL R. SHAH-JANI, ESQUIRE

JENINE R. DAVEY, ESQUIRE

LAUREN R. TABAS, ESQUIRE

VIVEK SRIVASTAVA, ESQUIRE

JAY B. JONES, ESQUIRE

PETER MULCAHY, ESQUIRE

ANDREW SPIVACK, ESQUIRE

JAIME MCGUINNESS, ESQUIRE

Attorneys for Plaintiff

LEGAL DESCRIPTION

ALL those two certain pieces or parcels of land, with improvements thereon, situate in the Township of Bloom, County of Clearfield and State of Pennsylvania, bounded and described as follows:

THE FIRST THEREOF: BEGINNING at a point on Highway Route 322, where Jeff Thomas' land meets the Dufour land; thence back from the said highway along the Jeff Thomas line, a distance of 420 feet to a point; thence towards DuBois and parallel to the highway Route 322, a distance of 70 feet to other lands of Dufour; thence along other lands of Dufour and parallel to Jeff Thomas land, a distance of 420 feet to right of way of State Highway Route 322; thence along Highway Route 322 in direction of Clearfield, a distance of 70 feet to a point and place of beginning.

The said premises having been surveyed are described as follows:

BEGINNING at an iron pin on the Eastern line of Pennsylvania State Highway Route No. 219 and Northwest corner of lands of Jeanine Thomas; thence South 79 degrees 10 minutes East 408.5 feet along line of Jeanine Thomas to an iron pin on line now or formerly of Arthur Dufour; thence along said Dufour line North 7 degrees 45 minutes East 64.03 feet to a pin; thence North 79 degrees 10 minutes West 433.75 feet to an iron pin on Eastern line of Pennsylvania State Highway Route No. 219; thence along said Pennsylvania State Highway Route 219 South 13 degrees 30 minutes East 70 feet to an iron pin and place of beginning. Containing 0.618 acres, more or less.

RESERVING, from the above described premises, however, all of the coal, fire clay, oil, gas and

other minerals with all rights necessary and convenient for the removal of the same without liability for damages of any kind or character.

THE SECOND THEREOF: BEGINNING at an iron pin on the Eastern side of Pennsylvania State Highway Legislative Route No. 59, Traffic Route U. S. No. 219 running from Grampian to Chestnut Grove, said iron pin being at the Northwest corner of land purchased by James & Vonnice Snyder from Jack & Patricia McCall and being also North 13 degrees 30 minutes West 548 feet from an old iron pin of land of Jeanine Thomas where it joins land formerly of Chauncey Derrick at the Eastern side of the above mentioned highway; thence from said beginning iron pin, North 13 degrees 30 minutes West for a distance of 80 feet along the Eastern side of said highway to an iron pin; thence through the lands of Eva McCall Nolder and Robert L. Nolder for a new line South 79 degrees 10 minutes East for a distance of 462.6 feet to an iron pin on line of lands formerly of Arthur Dufour; thence by said land South 7 degrees 45 minutes West for a distance of 73.17 feet to an iron pin; thence by land of the former grantees recently purchased from Jack McCall and Patricia McCall, North 79 degrees 10 minutes West for a distance of 433.75 feet to an iron pin and place of beginning. Containing 0.751 acres.

EXCEPTING from the above all fire, clay, oil and gas and all other minerals reserved in prior deeds.

BEING the same premises conveyed to James W. Snyder by Deed of James W. Snyder and Vonnice L. Snyder, husband and wife, dated the 10th day of October, 1980, as recorded in Deed Book Volume 803, Page 411.

Parcel Number: 104-F09-000-00075 & 104-F09-83

3468 CHESTNUT GROVE HIGHWAY, GRAMPING PA 16838

VERIFICATION

I hereby state that I am the attorney for Plaintiff in this matter, that Plaintiff is outside the jurisdiction of the court and/or the verification could not be obtained within the time allowed for the filing of the pleading, that I am authorized to make this verification pursuant to Pa.R.C.P. 1024 (c), and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of my knowledge, information and belief. Furthermore, counsel intends to substitute a verification from Plaintiff upon receipt.

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



Attorney for Plaintiff 62695

DATE: 10/23/08

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

ATTORNEY FOR PLAINTIFF

LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2

Plaintiff

vs.

MARIE H. SNYDER
JAMES W. SNYDER

Defendant(s)

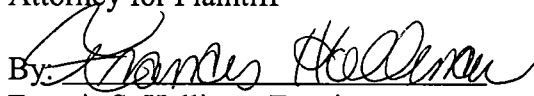
: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: NO. 2008-2049-CD
:
: CLEARFIELD COUNTY
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PRAECIPE TO SUBSTITUTE VERIFICATION
TO CIVIL ACTION COMPLAINT
IN MORTGAGE FORECLOSURE

TO THE PROTHONOTARY:


Kindly substitute the attached verification for the verification originally filed with the complaint in the instant matter.

Phelan Hallinan & Schmieg, LLP
Attorney for Plaintiff

By: 
Francis S. Hallinan, Esquire

Date: 11/11/08

PHS #: 185611

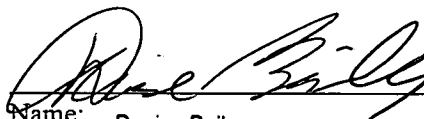
FILED *NOCC*
31:09/08
NOV 17 2008

William A. Shaw
Prothonotary/Clerk of Courts
5

VERIFICATION

Denise Bailey

hereby states that he/she is

Assistant Secretary of LITTON LOAN SERVICING, LP, SERVICING AGENT FOR LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE C-BASS MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-SP2, that he/she is authorized to take this Verification, and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are true and correct to the best of his/her knowledge, information and belief. The undersigned understands that this statement is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.



Name: Denise Bailey
Assistant Secretary

Title: Litton Loan Servicing, LP
Attorney In Fact

DATE: 10-24-08

Company: LITTON LOAN SERVICING, LP,
SERVICING AGENT FOR LASALLE BANK
NATIONAL ASSOCIATION, AS TRUSTEE
FOR THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES
2007-SP2

Loan: 30287130

File #: 185611

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

ATTORNEY FOR PLAINTIFF

LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2

Plaintiff

vs.

MARIE H. SNYDER
JAMES W. SNYDER

Defendant(s)

: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
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: NO. 2008-2049-CD
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: CLEARFIELD COUNTY
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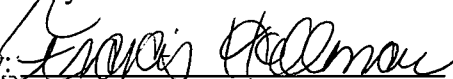
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Plaintiff's Praecipe to attach Verification of Complaint was sent via first class mail to the following on the date listed below:

MARIE H. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

Phelan Hallinan & Schmieg, LLP
Attorney for Plaintiff

By: 
Francis S. Hallinan, Esquire

Date: 11/11/08

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2049-CD

LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE C-BASS MORTGAGE LOAN ASSET- BACKED
CERTIFICATES, SERIES 2007-SP2

VS

SERVICE # 1 OF 2

MARIE H. SNYDER and JAMES W. SNYDER

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 11/23/2008

HEARING:

PAGE: 104849

DEFENDANT: MARIE H. SNYDER
ADDRESS: 3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

ATTEMPTS

^S
FILED
0/8:30am
DEC 15 2008
William A. Shaw
Clerk of Courts

SHERIFF'S RETURN

NOW, November 18, 2008 AT 10:50 AM PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON MARIE H. SNYDER, DEFENDANT

BY HANDING TO JAMES W. Snyder, Husband

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

ADDRESS SERVED 3468 Chestnut Grove Highway, Grampian, PA
16838

NOW _____ AT _____ AM / PM **POSTED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE FOR MARIE H. SNYDER

AT (ADDRESS) _____

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

I MAKE RETURN OF **NOT FOUND** AS TO MARIE H. SNYDER

REASON UNABLE TO LOCATE _____

SWORN TO BEFORE ME THIS

_____ DAY OF _____ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Dominic L. Morgillo
Deputy Signature
Dominic L. Morgillo
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2049-CD

LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE C-BASS MORTGAGE LOAN ASSET- BACKED
CERTIFICATES, SERIES 2007-SP2

vs

SERVICE # 2 OF 2

MARIE H. SNYDER and JAMES W. SNYDER

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 11/23/2008 HEARING: PAGE: 104849

DEFENDANT: JAMES W. SNYDER
ADDRESS: 3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS: VACANT

OCCUPIED

ATTEMPTS

SHERIFF'S RETURN

NOW, November 18, 2008 AT 10:50 AM PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON JAMES W. SNYDER, DEFENDANT

BY HANDING TO James W. Snyder, Defendant

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

ADDRESS SERVED 3468 Chestnut Grove Highway, Grampian, PA 16838

NOW AT AM / PM POSTED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE FOR JAMES W. SNYDER

AT (ADDRESS)

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

I MAKE RETURN OF NOT FOUND AS TO JAMES W. SNYDER

REASON UNABLE TO LOCATE

SWORN TO BEFORE ME THIS

DAY OF 2008

So Answers CHESTER A. HAWKINS, SHERIFF

BY:

Dominic L. Morgillo
Deputy Signature

Dominic L. Morgillo
Print Deputy Name

Phelan Hallinan & Schmieg, LLP
By: Daniel G. Schmieg, Esquire
Identification No. 62205
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
215-563-7000

Attorney for Plaintiff

**LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2**

: **CLEARFIELD COUNTY**
:
: **COURT OF COMMON PLEAS**
:
: **CIVIL DIVISION**
:
: **No. 2008-2049-CD**
:
:

vs.

**MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014**

FILED

IAN 05 2009
M/ 3:30/6
William A. Shaw
Prothonotary/Clerk of Courts
CENT W/ NOTICE
TO EACH DEPT

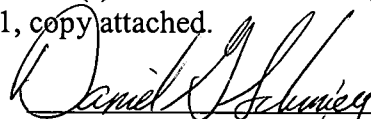
**PRAECIPE FOR IN REM JUDGMENT FOR FAILURE TO
ANSWER AND ASSESSMENT OF DAMAGES**

TO THE PROTHONOTARY:

Kindly enter judgment in favor of the Plaintiff and against **MARIE H. SNYDER, and
JAMES W. SNYDER**, Defendant(s) 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	\$199,074.67
Interest - 10/22/2008 to 12/30/2008	
	<u>\$3,166.80</u>
TOTAL	\$202,241.47

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


Daniel G. Schmieg, Esquire
Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 1-5-09



Phelan Hallinan & Schmieg, LLP
By: Daniel G. Schmieg, Esquire
Identification No. 62205
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
215-563-7000

Attorney for Plaintiff

**LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2**

**: CLEARFIELD COUNTY
:
: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: No. 2008-2049-CD
:**

vs.

**MARIE H. SNYDER
JAMES W. SNYDER**

VERIFICATION OF NON-MILITARY SERVICE

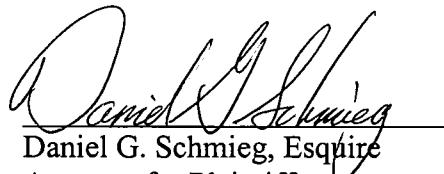
Daniel G. Schmieg, Esquire, hereby verifies that he is attorney for the Plaintiff in the above-captioned matter, and that on information and belief, he has knowledge of the following facts, to wit:

(a) that the defendant(s) is/are not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of Congress of 1940, as amended.

(b) that defendant MARIE H. SNYDER is over 18 years of age and resides at 3468 CHESTNUT GROVE HIGHWAY, GRAMPIAN, PA 16838-9014.

(c) that defendant JAMES W. SNYDER is over 18 years of age and resides at 3468 CHESTNUT GROVE HIGHWAY, GRAMPIAN, PA 16838-9014.

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


Daniel G. Schmieg, Esquire
Attorney for Plaintiff

(Rule of Civil Procedure No. 236) – Revised

LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR THE
C-BASS MORTGAGE LOAN ASSET-
BACKED CERTIFICATES, SERIES 2007-
SP2

vs.

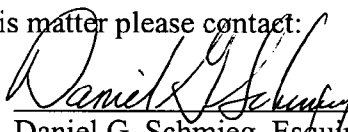
MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

: CLEARFIELD COUNTY
:
: COURT OF COMMON PLEAS
:
:
: CIVIL DIVISION
:
: No. 2008-2049-CD
:
:

Notice is given that a Judgment in the above captioned matter has been entered
against you on 1-5-09.

By:  DEPUTY

If you have any questions concerning this matter please contact:


Daniel G. Schmieg, Esquire
Attorney or Party Filing
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
215-563-7000

**** THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT AND
ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. IF YOU
HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS IS NOT AND
SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT
ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY. ****

✓
PHELAN HALLINAN & SCHMIEG, LLP
By: LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

LASALLE BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES 2007-
SP2

COURT OF COMMON PLEAS
CIVIL DIVISION

NO. 2008-2049-CD

Plaintiff

v.
MARIE H. SNYDER
JAMES W. SNYDER

CLEARFIELD COUNTY

Defendant(s)

TO: JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

DATE OF NOTICE: December 15, 2008

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.


IMPORTANT NOTICE

You are in default because you have failed to enter a written appearance personally or by attorney and file in writing with the court your defenses or objections to the claims set forth against you. Unless you act within ten (10) days from the date of this notice, a Judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to a lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal help:

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

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

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


VIENNA C. VITACOLONNA
Legal Assistant

PHELAN HALLINAN & SCHMIEG, LLP
By: LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

ATTORNEY FOR PLAINTIFF

LASALLE BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES 2007-
SP2

COURT OF COMMON PLEAS
CIVIL DIVISION

NO. 2008-2049-CD

Plaintiff

v.

CLEARFIELD COUNTY

MARIE H. SNYDER
JAMES W. SNYDER

Defendant(s)

TO: MARIE H. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

DATE OF NOTICE: December 15, 2008

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN, AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY AS ENFORCEMENT OF LIEN AGAINST PROPERTY.

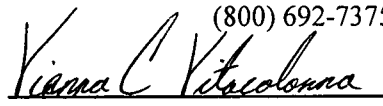
IMPORTANT NOTICE

You are in default because you have failed to enter a written appearance personally or by attorney and file in writing with the court your defenses or objections to the claims set forth against you. Unless you act within ten (10) days from the date of this notice, a Judgment may be entered against you without a hearing and you may lose your property or other important rights. You should take this notice to a lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the following office to find out where you can get legal help:

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(814) 765-2641

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


VIENNA C. VITACOLONNA
Legal Assistant

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104849
NO: 08-2049-CD
SERVICES 2
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE
vs.
DEFENDANT: MARIE H. SNYDER and JAMES W. SNYDER

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	742505	20.00
SHERIFF HAWKINS	PHELAN	742505	38.04

³
FILED
09:00 AM
FEB 13 2009

William A. Shaw
Prothonotary/Clerk of Courts

Sworn to Before Me This

_____ Day of _____ 2008

So Answers,



Chester A. Hawkins
Sheriff

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

LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No. 2008-2049-CD.

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

vs.

MARIE H. SNYDER

JAMES W. SNYDER

To the PROTHONOTARY:

Issue writ of execution in the above matter:

Amount Due

\$202,241.47

Interest from 12/31/08 to Sale

Prothonotary costs \$135.00

Per diem \$33.25

Add'l Costs

\$3,343.50

Writ Total

\$

Daniel G. Schmieg
DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Note: Please attach description of Property.

185611

FILED

FEB 13 2009

William A. Shaw
Prothonotary/Clerk of Courts

Att'y pd. \$20.00

2 CC & 6 writs
w/prop. desc.
to Sheriff

No. 2008-2049-CD.....

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

LASALLE BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES 2007-SP2

vs.

MARIE H. SNYDER
JAMES W. SNYDER

PRAECIPE FOR WRIT OF EXECUTION
(Mortgage Foreclosure)

Filed:

Daniel G. Schmieg
DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Address: MARIE H. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

JAMES W. SNYDER
3 468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

FILED

FEB 13 2009

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG
By: DANIEL G. SCHMIEG
Identification No. 62205
Suite 1400
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR THE C-
BASS MORTGAGE LOAN ASSET-BACKED
CERTIFICATES, SERIES 2007-SP2
4828 LOOP CENTRAL DRIVE
HOUSTON, TX 77081-2226

Plaintiff,

v.

MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

Defendant(s).

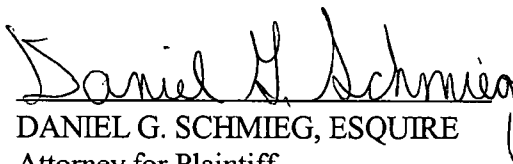
:
:
: **CLEARFIELD COUNTY**
: **COURT OF COMMON PLEAS**
:
: **CIVIL DIVISION**
:
: **NO. 2008-2049-CD**
:
:
:
:

CERTIFICATION

DANIEL G. SCHMIEG, ESQUIRE, hereby states that he is the attorney for the Plaintiff in the above captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

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

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


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR THE C-
BASS MORTGAGE LOAN ASSET-BACKED
CERTIFICATES, SERIES 2007-SP2
4828 LOOP CENTRAL DRIVE
HOUSTON, TX 77081-2226

Plaintiff,

v.

MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

Defendant(s).

CLEARFIELD COUNTY
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 2008-2049-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE C-BASS MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-SP2, Plaintiff in the above action, by its attorney, DANIEL G. SCHMIEG, ESQUIRE, sets forth as of the date the Praecipe for the Writ of Execution was filed, the following information concerning the real property located at 3468 CHESTNUT GROVE HIGHWAY, GRAMPIAN, PA 16838-9014.

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

NAME

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

MARIE H. SNYDER

3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

JAMES W. SNYDER

3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

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

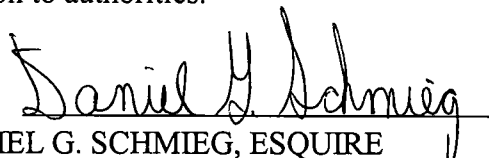
NAME

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

Same as Above

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

JANUARY 29, 2009
Date


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

**LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR THE C-
BASS MORTGAGE LOAN ASSET-BACKED
CERTIFICATES, SERIES 2007-SP2
4828 LOOP CENTRAL DRIVE
HOUSTON, TX 77081-2226**

Plaintiff,

v.

**MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014**

Defendant(s).

**CLEARFIELD COUNTY
COURT OF COMMON PLEAS**

CIVIL DIVISION

NO. 2008-2049-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

**LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE C-BASS
MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-SP2, Plaintiff in the above
action, by its attorney, DANIEL G. SCHMIEG, ESQUIRE, sets forth as of the date the Praecipe for the Writ of
Execution was filed, the following information concerning the real property located at 3468 CHESTNUT
GROVE HIGHWAY, GRAMPIAN, PA 16838-9014.**

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

NAME

NATIONAL CITY BANK

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

**4661 EAST MAIN STREET
COLUMBUS, OH 43213**

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

NAME

None

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

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

NAME

None

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

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

None

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

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

NAME

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

TENANT/OCCUPANT

3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

DOMESTIC RELATIONS
CLEARFIELD COUNTY

CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET STREET
CLEARFIELD, PA 16830

COMMONWEALTH OF
PENNSYLVANIA

DEPARTMENT OF WELFARE
PO BOX 2675
HARRISBURG, PA 17105

Commonwealth of Pennsylvania
Bureau of Individual Tax
Inheritance Tax Division

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

Internal Revenue Service
Federated Investors Tower

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

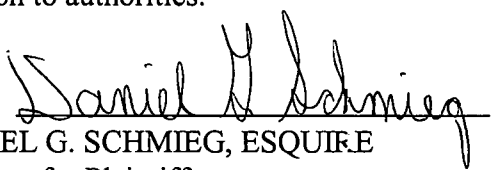
Department of Public Welfare
TPL Casualty Unit
Estate Recovery Program

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

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

JANUARY 29, 2009

Date


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Copy

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

LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2

vs.

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No.

No. 2008-2049-CD

No.

WRIT OF EXECUTION
(Mortgage Foreclosure)

MARIE H. SNYDER

JAMES W. SNYDER

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

PREMISES: 3468 CHESTNUT GROVE HIGHWAY, GRAMPIAN, PA 16838-9014
(See Legal Description attached)

Amount Due

Interest from 12/31/08 to Sale
Per diem \$33.25
Add'l Costs
Writ Total

Prothonotary costs \$202,241.47
135.00

\$ _____

\$3,343.50

Willi L. Hagan

OFFICE OF THE PROTHONOTARY OF CLEARFIELD
COUNTY, PENNSYLVANIA

Dated 2/13/09
(SEAL)

No. 2008-2049-CD.....

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

LASALLE BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES 2007-SP2

vs.

MARIE H. SNYDER
JAMES W. SNYDER

WRIT OF EXECUTION
(Mortgage Foreclosure)

Costs

Real Debt \$202,241.47

Int. from 12/31/08
To Date of Sale (\$33.25 per diem)

Costs

Prothy Pd. 135.00

Sheriff

Daniel G. Schmieg
DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Address: MARIE H. SNYDER JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY 3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014 GRAMPIAN, PA 16838-9014

LEGAL DESCRIPTION

ALL those two certain pieces or parcels of land, with improvements thereon, situate in the Township of Bloom, County of Clearfield and State of Pennsylvania, bounded and described as follows:

THE FIRST THEREOF: BEGINNING at a point on Highway Route 322, where Jeff Thomas' land meets the Dufour land; thence back from the said highway along the Jeff Thomas line, a distance of 420 feet to a point; thence towards DuBois and parallel to the highway Route 322, a distance of 70 feet to other lands of Dufour; thence along other lands of Dufour and parallel to Jeff Thomas land, a distance of 420 feet to right of way of State Highway Route 322; thence along Highway Route 322 in direction of Clearfield, a distance of 70 feet to a point and place of beginning.

The said premises having been surveyed are described as follows:

BEGINNING at an iron pin on the Eastern line of Pennsylvania State Highway Route No. 219 and Northwest corner of lands of Jeanine Thomas; thence South 79 degrees 10 minutes East 408.5 feet along line of Jeanine Thomas to an iron pin on line now or formerly of Arthur Dufour; thence along said Dufour line North 7 degrees 45 minutes East 64.03 feet to a pin; thence North 79 degrees 10 minutes West 433.75 feet to an iron pin on Eastern line of Pennsylvania State Highway Route No. 219; thence along said Pennsylvania State Highway Route 219 South 13 degrees 30 minutes East 70 feet to an iron pin and place of beginning. Containing 0.618 acres, more or less.

RESERVING, from the above described premises, however, all of the coal, fire clay, oil, gas and other minerals with all rights necessary and convenient for the removal of the same without liability for damages of any kind or character.

THE SECOND THEREOF: BEGINNING at an iron pin on the Eastern side of Pennsylvania State Highway Legislative Route No. 59, Traffic Route U. S. No. 219 running from Grampian to Chestnut Grove, said iron pin being at the Northwest corner of land purchased by James & Vonnice Snyder from Jack & Patricia McCall and being also North 13 degrees 30 minutes West 548 feet from an old iron pin of land of Jeanine Thomas where it joins land formerly of Chauncey Derrick at the Eastern side of the above mentioned highway; thence from said beginning iron pin, North 13 degrees 30 minutes West for a distance of 80 feet along the Eastern side of said highway to an iron pin; thence through the lands of Eva McCall Nolder and Robert L. Nolder for a new line South 79 degrees 10 minutes East for a distance of 462.6 feet to an iron pin on line of lands formerly of Arthur Dufour; thence by said land South 7 degrees 45 minutes West for a distance of 73.17 feet to an iron pin; thence by land of the former grantees recently purchased from Jack McCall and Patricia McCall, North 79 degrees 10 minutes West for a distance of 433.75 feet to an iron pin and place of beginning. Containing 0.751 acres.

EXCEPTING from the above all fire, clay, oil and gas and all other minerals reserved in prior deeds.

BEING the same premises conveyed to James W. Snyder by Deed of James W. Snyder and Vonnice L. Snyder, husband and wife, dated the 10th day of October, 1980, as recorded in Deed Book Volume 803, Page 411.

PARCEL IDENTIFICATION NO: 104-F09-000-00083, CONTROL #: 104094642
104-F09-000-00075, CONTROL #: 104094641

TITLE TO SAID PREMISES IS VESTED IN James W. Snyder and Marie H. Snyder, h/w, as tenants by the entireties and not as tenants common, by Deed from James W. Snyder and Marie H. Snyder, h/w, dated 10/31/1992, recorded 11/04/1992 in Book 1494, Page 361.

Premises being: 3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

FILED

MAR 11 2009

William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire

Atty. I.D. No. 69849

One Penn Center, Suite 1400

1617 John F. Kennedy Boulevard

Philadelphia, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

LASALLE BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR THE C-BASS MORTGAGE
LOAN ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2

Plaintiff

Court of Common Pleas

Civil Division

CLEARFIELD County

No. 2008-2049-CD

v.

MARIE H. SNYDER

JAMES W. SNYDER

Defendants

PLAINTIFF'S MOTION TO REASSESS DAMAGES

Plaintiff, by its Attorney, Michele M. Bradford, Esquire, moves the Court to direct the Prothonotary to amend the judgment in this matter, and in support thereof avers the following:

1. Plaintiff commenced this foreclosure action by filing a Complaint on October 24, 2008, a true and correct copy of which is attached hereto, made part hereof, and marked as Exhibit "A".

2. Judgment was entered on January 5, 2009 in the amount of \$202,241.47. A true and correct copy of the praecipe for judgment is attached hereto, made part hereof, and marked as Exhibit "B".

3. Pursuant to Pennsylvania Rule of Civil Procedure 1037(b)(1), a default judgment containing a dollar amount must be entered for the amount claimed in the complaint and any item which can be calculated from the complaint, i.e. bringing the interest current. However, new items cannot be added at the time of entry of the judgment.

4. The Property is listed for Sheriff's Sale on May 1, 2009.

5. Additional sums have been incurred or expended on Defendants' behalf since the Complaint was filed and Defendants have been given credit for any payments that have been made since the judgment. The amount of damages should now read as follows:

Principal Balance	\$186,058.07
Interest Through May 1, 2009	\$20,115.37
Per Diem \$45.24	
Late Charges	\$1,586.68
Legal fees	\$1,300.00
Cost of Suit and Title	\$1,445.00
Sheriff's Sale Costs	\$0.00
Property Inspections/ Property Preservation	\$50.00
Appraisal/Brokers Price Opinion	\$0.00
Mortgage Insurance Premium /	\$0.00
Private Mortgage Insurance	
Non Sufficient Funds Charge	\$0.00
Suspense/Misc. Credits	(\$0.00)
Escrow Deficit	\$5,736.47
TOTAL	\$216,291.59

6. The judgment formerly entered is insufficient to satisfy the amounts due on the Mortgage.

7. Under the terms of the Mortgage and Pennsylvania law, Plaintiff is entitled to inclusion of the figures set forth above in the amount of judgment against the Defendants.

8. Plaintiff's foreclosure judgment is in rem only and does not include personal liability, as addressed in Plaintiff's attached brief.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court amend the judgment as requested.

DATE: 3/10/09

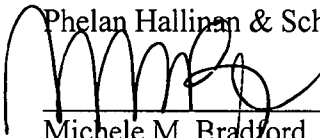
By:  Phelan Hallinan & Schmieg, LLP
Michele M. Bradford, Esquire
Attorney for Plaintiff

Exhibit “A”

PHELAN HALLINAN & SCHMIEG, LLP
LAWRENCE T. PHELAN, ESQ., Id. No. 32227
FRANCIS S. HALLINAN, ESQ., Id. No. 62695
DANIEL G. SCHMIEG, ESQ., Id. No. 62205
MICHELE M. BRADFORD, ESQ., Id. No. 69849
JUDITH T. ROMANO, ESQ., Id. No. 58745
SHEETAL SHAH-JANI, ESQ., Id. No. 81760
JENINE R. DAVEY, ESQ., Id. No. 87077
LAUREN R. TABAS, ESQ., Id. No. 93337
VIVEK SRIVASTAVA, ESQ., Id. No. 202331
JAY B. JONES, ESQ., Id. No. 86657
PETER MULCAHY, ESQ., Id. No. 61791
ANDREW SPIVACK, ESQ., Id. No. 84439
JAIME MCGUINNESS, ESQ., Id. No. 90134
ONE PENN CENTER PLAZA, SUITE 1400
PHILADELPHIA, PA 19103
(215) 563-7000

185611

LASALLE BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES 2007-SP2
4828 LOOP CENTRAL DRIVE
HOUSTON, TX 77081-2226

Plaintiff

v.

MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

Defendants

CIVIL ACTION - LAW
COMPLAINT IN MORTGAGE FORECLOSURE

FILED

OCT 24 2008

William A. Shaw
Prothonotary/Clerk of Courts

ATTORNEY FOR PLAINTIFF

COURT OF COMMON PLEAS

CIVIL DIVISION

TERM

NO. 2008-2049-CD

CLEARFIELD COUNTY

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

**ATTORNEY FILE COPY
PLEASE RETURN**

NOTICE

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

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

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

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

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

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

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

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

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

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

1. Plaintiff is

LASALLE BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR THE C-BASS MORTGAGE
LOAN ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2
4828 LOOP CENTRAL DRIVE
HOUSTON, TX 77081-2226

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

MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

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

3. On 03/27/2006 mortgagor(s) made, executed and delivered a mortgage upon the premises hereinafter described to HOME123 CORPORATION which mortgage is recorded in the Office of the Recorder of CLEARFIELD County, in Mortgage Instrument No. 200604827. The PLAINTIFF is now the legal owner of the mortgage and is in the process of formalizing an assignment of same. The mortgage and assignment(s), if any, are matters of public record and are incorporated herein by reference in accordance with Pa.R.C.P. 1019(g); which Rule relieves the Plaintiff from its obligations to attach documents to pleadings if those documents are of public record.
4. The premises subject to said mortgage is described as attached.
5. The mortgage is in default because monthly payments of principal and interest upon said mortgage due 04/01/2008 and each month thereafter are due and unpaid, and by the terms of said mortgage, upon failure of mortgagor to make such payments after a date specified by written notice sent to Mortgagor, the entire principal balance and all interest due thereon are collectible forthwith.

6. The following amounts are due on the mortgage:

Principal Balance	\$186,058.07
Interest	\$10,586.16
03/01/2008 through 10/21/2008	
Attorney's Fees	\$1,250.00
Cumulative Late Charges	\$307.69
03/27/2006 to 10/21/2008	
Cost of Suit and Title Search	<u>\$550.00</u>
Subtotal	\$198,751.92
Escrow	
Credit	\$0.00
Deficit	\$322.75
Subtotal	<u>\$322.75</u>
TOTAL	\$199,074.67

7. If the mortgage is reinstated prior to a Sheriff's Sale, the attorney's fee set forth above may be less than the amount demanded based on work actually performed. The attorney's fees requested are in conformity with the mortgage and Pennsylvania law. Plaintiff reserves its right to collect attorney's fees up to 5% of the remaining principal balance in the event the property is sold to a third party purchaser at Sheriff's Sale, or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.
8. Plaintiff is not seeking a judgment of personal liability (or an in personam judgment) against the Defendant(s) in the Action; however, Plaintiff reserves its right to bring a separate Action to establish that right, if such right exists. If Defendant(s) has/have received a discharge of personal liability in a bankruptcy proceeding, this Action of Mortgage Foreclosure is in no way an attempt to reestablish such personal liability discharged in bankruptcy, but only to foreclose the mortgage and sell the mortgaged premises pursuant to Pennsylvania Law.

9. Notice of Intention to Foreclose as set forth in Act 6 of 1974, Notice of Homeowner's Emergency Assistance Program pursuant to Act 91 of 1983, as amended in 1998, and/or Notice of Default as required by the mortgage document, as applicable, have been sent to the Defendant(s) on the date(s) set forth thereon, and the temporary stay as provided by said notice has terminated because Defendant(s) has/have failed to meet with the Plaintiff or an authorized consumer credit counseling agency, or has/have been denied assistance by the Pennsylvania Housing Finance Agency.

WHEREFORE, PLAINTIFF demands an in rem Judgment against the Defendant(s) in the sum of \$199,074.67, together with interest from 10/21/2008 at the rate of \$45.24 per diem to the date of Judgment, and other costs and charges collectible under the mortgage and for the foreclosure and sale of the mortgaged property.

PHELAN HALLINAN & SCHMIEG, LLP

By: 

LAWRENCE T. PHELAN, ESQUIRE

FRANCIS S. HALLINAN, ESQUIRE 

DANIEL G. SCHMIEG, ESQUIRE

MICHELE M. BRADFORD, ESQUIRE

JUDITH T. ROMANO, ESQUIRE

SHEETAL R. SHAH-JANI, ESQUIRE

JENINE R. DAVEY, ESQUIRE

LAUREN R. TABAS, ESQUIRE

VIVEK SRIVASTAVA, ESQUIRE

JAY B. JONES, ESQUIRE

PETER MULCAHY, ESQUIRE

ANDREW SPIVACK, ESQUIRE

JAIME MCGUINNESS, ESQUIRE

Attorneys for Plaintiff

LEGAL DESCRIPTION

ALL those two certain pieces or parcels of land, with improvements thereon, situate in the Township of Bloom, County of Clearfield and State of Pennsylvania, bounded and described as follows:

THE FIRST THEREOF: BEGINNING at a point on Highway Route 322, where Jeff Thomas' land meets the Dufour land; thence back from the said highway along the Jeff Thomas line, a distance of 420 feet to a point; thence towards DuBois and parallel to the highway Route 322, a distance of 70 feet to other lands of Dufour; thence along other lands of Dufour and parallel to Jeff Thomas land, a distance of 420 feet to right of way of State Highway Route 322; thence along Highway Route 322 in direction of Clearfield, a distance of 70 feet to a point and place of beginning.

The said premises having been surveyed are described as follows:

BEGINNING at an iron pin on the Eastern line of Pennsylvania State Highway Route No. 219 and Northwest corner of lands of Jeanine Thomas; thence South 79 degrees 10 minutes East 408.5 feet along line of Jeanine Thomas to an iron pin on line now or formerly of Arthur Dufour; thence along said Dufour line North 7 degrees 45 minutes East 64.03 feet to a pin; thence North 79 degrees 10 minutes West 433.75 feet to an iron pin on Eastern line of Pennsylvania State Highway Route No. 219; thence along said Pennsylvania State Highway Route 219 South 13 degrees 30 minutes East 70 feet to an iron pin and place of beginning. Containing 0.618 acres, more or less.

RESERVING, from the above described premises, however, all of the coal, fire clay, oil, gas and

other minerals with all rights necessary and convenient for the removal of the same without liability for damages of any kind or character.

THE SECOND THEREOF: BEGINNING at an iron pin on the Eastern side of Pennsylvania State Highway Legislative Route No. 59, Traffic Route U. S. No. 219 running from Grampian to Chestnut Grove, said iron pin being at the Northwest corner of land purchased by James & Vonnie Snyder from Jack & Patricia McCall and being also North 13 degrees 30 minutes West 548 feet from an old iron pin of land of Jeanine Thomas where it joins land formerly of Chauncey Derrick at the Eastern side of the above mentioned highway; thence from said beginning iron pin, North 13 degrees 30 minutes West for a distance of 80 feet along the Eastern side of said highway to an iron pin; thence through the lands of Eva McCall Nolder and Robert L. Nolder for a new line South 79 degrees 10 minutes East for a distance of 462.6 feet to an iron pin on line of lands formerly of Arthur Dufour; thence by said land South 7 degrees 45 minutes West for a distance of 73.17 feet to an iron pin; thence by land of the former grantees recently purchased from Jack McCall and Patricia McCall, North 79 degrees 10 minutes West for a distance of 433.75 feet to an iron pin and place of beginning. Containing 0.751 acres.

EXCEPTING from the above all fire, clay, oil and gas and all other minerals reserved in prior deeds.

BEING the same premises conveyed to James W. Snyder by Deed of James W. Snyder and Vonnie L. Snyder, husband and wife, dated the 10th day of October, 1980, as recorded in Deed Book Volume 803, Page 411.

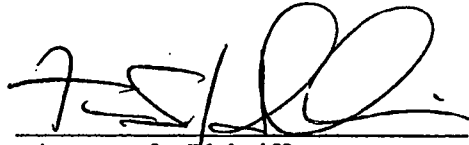
Parcel Number: 104-F09-000-00075 & 104-F09-83

3468 CHESTNUT GROVE HIGHWAY, GRAMPING PA 16838

VERIFICATION

I hereby state that I am the attorney for Plaintiff in this matter, that Plaintiff is outside the jurisdiction of the court and/or the verification could not be obtained within the time allowed for the filing of the pleading, that I am authorized to make this verification pursuant to Pa.R.C.P. 1024 (c), and that the statements made in the foregoing Civil Action in Mortgage Foreclosure are based upon information supplied by Plaintiff and are true and correct to the best of my knowledge, information and belief. Furthermore, counsel intends to substitute a verification from Plaintiff upon receipt.

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



Attorney for Plaintiff 62695

DATE: 10/23/08

Exhibit “B”

Phelan Hallinan & Schmieg, LLP
By: Daniel G. Schmieg, Esquire
Identification No. 62205
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103
215-563-7000

ATTORNEY FILE COPY Attorney for Plaintiff
PLEASE RETURN

**LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2**

: **CLEARFIELD COUNTY**
:
: **COURT OF COMMON PLEAS**
:
: **CIVIL DIVISION**
:
: **No. 2008-2049-CD**

vs.

**MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014**

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

JAN 05 2009

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

Will
Prothonotary/
Clerk of Courts

TO THE PROTHONOTARY: **ATTORNEY FILE COPY**
PLEASE RETURN

Kindly enter judgment in favor of the Plaintiff and against **MARIE H. SNYDER, and
JAMES W. SNYDER**, Defendant(s) 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
Interest - 10/22/2008 to 12/30/2008

\$199,074.67

\$3,166.80

TOTAL

\$202,241.47

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

ATTORNEY FILE COPY Daniel G. Schmieg, Esquire
PLEASE RETURN Attorney for Plaintiff

DAMAGES ARE HEREBY ASSESSED AS INDICATED.

DATE: 1-5-09

PHS # 185611

PRO PROTHY

VERIFICATION

Michele M. Bradford, Esquire, hereby states that she is the attorney for Plaintiff in this action, that she is authorized to make this verification, and that the statements made in the foregoing Motion to Reassess Damages are true and correct to the best of her knowledge, information and belief. The undersigned understands that this statement herein is made subject to the penalties of 18 Pa. C.S. §4904 relating to unsworn falsification to authorities.

DATE: _____

3/10/09

By: _____

Phelan Hallinan & Schmieg, LLP



Michele M. Bradford, Esquire
Attorney for Plaintiff

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire, Atty. I.D. No. 69849
1617 John F. Kennedy Boulevard, Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

LASALLE BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR THE C-BASS MORTGAGE
LOAN ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2

Plaintiff

v.

MARIE H. SNYDER
JAMES W. SNYDER

Defendants

Court of Common Pleas

Civil Division

CLEARFIELD County

No. 2008-2049-CD

CERTIFICATION OF SERVICE

I hereby certify that true and correct copies of Plaintiff's Motion to Reassess Damages, and Brief in Support thereof were sent to the following individuals on the date indicated below.

MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

DATE: 3/10/09

By: 

Phelan Hallinan & Schmieg, LLP

Michele M. Bradford, Esquire
Attorney for Plaintiff

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

LASALLE BANK NATIONAL ASSOCIATION,	:	Court of Common Pleas
AS TRUSTEE FOR THE C-BASS MORTGAGE	:	
LOAN ASSET-BACKED CERTIFICATES,	:	Civil Division
SERIES 2007-SP2	:	
Plaintiff	:	CLEARFIELD County
	:	
v.	:	No. 2008-2049-CD
	:	
MARIE H. SNYDER		
JAMES W. SNYDER		

Defendants

ORDER

AND NOW, this _____ day of _____, 2009 the Prothonotary is ORDERED to amend the in rem judgment and the Sheriff is ORDERED to amend the writ nunc pro tunc in this case as follows:

Principal Balance	\$186,058.07
Interest Through May 1, 2009	\$20,115.37
Per Diem \$45.24	
Late Charges	\$1,586.68
Legal fees	\$1,300.00
Cost of Suit and Title	\$1,445.00
Sheriff's Sale Costs	\$0.00
Property Inspections/ Property Preservation	\$50.00
Appraisal/Brokers Price Opinion	\$0.00
Mortgage Insurance Premium /	\$0.00
Private Mortgage Insurance	
Non Sufficient Funds Charge	\$0.00

(\$0.00)
\$5,736.47

\$216,291.59

Note: The above figure is not a payoff quote. Sheriff's commission is not included in the above figure.

J.

185611

CIA

: Court of Common Pleas
:
: Civil Division
:
: CLEARFIELD County
:
: No. 2008-2049-CD
:

BY THE COURT
Judge J. C. Cunningham

William A. Shaw
Prothonotary/Clerk of Courts

FILED

MAR 12 2009

William A. Shaw
Prothonotary/Clerk of Courts

DATE: 3/12/09

☒ You are responsible for serving all appropriate parties.
____ The Prothonotary's office has provided service to the following parties:
____ Plaintiff(s) ____ Plaintiff(s) Attorney ____ Other
____ Defendant(s) ____ Defendant(s) Attorney
____ Special Instructions:

^s
FILED *no cc*
m/11/000
MAR 13 2009
William A. Shaw
Prothonotary/Clerk of Courts

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire, Atty. I.D. No. 69849
1617 John F. Kennedy Boulevard, Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

LASALLE BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR THE C-BASS MORTGAGE
LOAN ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2

Plaintiff

v.

MARIE H. SNYDER
JAMES W. SNYDER

Defendants

Court of Common Pleas

Civil Division

CLEARFIELD County

No. 2008-2049-CD

CERTIFICATION OF SERVICE

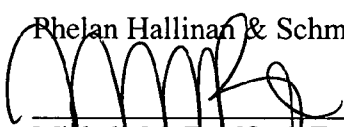
I hereby certify that a true and correct copy of the Court's March 12, 2009 Rule directing the Defendants to show cause as to why Plaintiff's Motion to Reassess Damages should not be granted was served upon the following individuals on the date indicated below.

MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

DATE: 3/17/09

By:

Phelan Hallinan & Schmieg, LLP


Michele M. Bradford, Esquire
Attorney for Plaintiff

5
FILED

APR 06 2009

William A. Shaw

Prothonotary/Clerk of Courts

no C/C

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNSYLVANIA

LASALLE BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES 2007-SP2
Plaintiff,
v.

: CLEARFIELD COUNTY
: COURT OF COMMON PLEAS
:
: CIVIL DIVISION
:
: NO. 2008-²⁰⁴⁹~~1049~~-CD


MARIE H. SNYDER
JAMES W. SNYDER
Defendant(s)

AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF CLEARFIELD) SS:

Plaintiff in the above action sets forth as of the date the Praecept for the Writ of Execution was filed the following information concerning the real property located at: 3468 CHESTNUT GROVE HIGHWAY, GRAMPIAN, PA 16838-9014.

As required by Pa. R.C.P. 3129.2(a) Notice of Sale has been given to Lienholders in the manner required by Pa. R.C.P. 3129.2(c) on each of the persons or parties named, at that address set forth on the Affidavit No. 2 (previously filed) and/or Amended Affidavit No. 2 on the date indicated. A copy of the Certificate of Mailing (Form 3817) and/or Certified Mail Return Receipt stamped by the U.S. Postal Service is attached for each notice.


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Date: April 1, 2009

IMPORTANT NOTICE: This property is sold at the direction of the plaintiff. It may not be sold in the absence of a representative of the plaintiff at the Sheriff's Sale. The sale must be postponed or stayed in the event that a representative of the plaintiff is not present at the sale.

**LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR THE C-
BASS MORTGAGE LOAN ASSET-BACKED
CERTIFICATES, SERIES 2007-SP2
4828 LOOP CENTRAL DRIVE
HOUSTON, TX 77081-2226**

Plaintiff,

v.

**MARIE H. SNYDER
JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014**

Defendant(s).

**CLEARFIELD COUNTY
COURT OF COMMON PLEAS

CIVIL DIVISION

NO. 2008-2049-CD**

AMENDED AFFIDAVIT PURSUANT TO RULE 3129.1

**LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE C-BASS
MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-SP2**, Plaintiff in the above
action, by its attorney, DANIEL G. SCHMIEG, ESQUIRE, sets forth as of the date the Praecipe for the Writ of
Execution was filed, the following information concerning the real property located at **3468 CHESTNUT
GROVE HIGHWAY, GRAMPIAN, PA 16838-9014**.

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

NAME

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

None

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

NAME

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

NATIONAL CITY BANK

4661 EAST MAIN STREET
COLUMBUS, OH 43213

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

NAME

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

None

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

NAME

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

None

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

NAME

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

TENANT/OCCUPANT

3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

DOMESTIC RELATIONS
CLEARFIELD COUNTY

CLEARFIELD COUNTY COURTHOUSE
230 EAST MARKET STREET
CLEARFIELD, PA 16830

COMMONWEALTH OF
PENNSYLVANIA

DEPARTMENT OF WELFARE
PO BOX 2675
HARRISBURG, PA 17105

Commonwealth of Pennsylvania
Bureau of Individual Tax
Inheritance Tax Division

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

Internal Revenue Service
Federated Investors Tower

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

Department of Public Welfare
TPL Casualty Unit
Estate Recovery Program

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

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

APRIL 1, 2009
Date


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

CQS

Name and
Address
of Sender

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

Line	Article Number	Name of Addressee, Street, and Post Office Address	Fee
1		TENANT/OCCUPANT 3468 CHESTNUT GROVE HIGHWAY GRAMPIAN, PA 16838-9014	
2		DOMESTIC RELATIONS CLEARFIELD COUNTY CLEARFIELD COUNTY COURTHOUSE 230 EAST MARKET STREET CLEARFIELD, PA 16830	
3		COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF WELFARE PO BOX 2675 HARRISBURG, PA 17105	
4		Commonwealth of Pennsylvania, Bureau of Individual Tax Inheritance Tax Division, 6 th Floor, Strawberry Sq., Dept 28061 Harrisburg, PA 17128	
5		Internal Revenue Service, Federated Investors Tower 13 th Floor, Suite 1300, 1001 Liberty Avenue Pittsburgh, PA 15222	
6		Department of Public Welfare, TPL Casualty Unit Estate Recovery Program, P.O. Box 8486 Willow Oak Building Harrisburg, PA 17105	
7		NATIONAL CITY BANK 4661 EAST MAIN STREET COLUMBUS, OH 43213	
8			
9			
10			
11	JVS		
12			
Total Number of Pieces Listed by Sender		Re: MARIE H. SNYDER	
Total Number of Pieces Received at Post Office		185611 TEAM 3	
		Postmaster, Per (Name of Receiving Employee)	
			The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$50,000 per piece subject to a limit of \$500,000 per occurrence. The maximum indemnity payable on Express Mail merchandise is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional insurance. See Domestic Mail Manual R900, S913 and S921 for limitations of coverage.

UNITED STATES POSTAGE
\$ 02.78
02 1M MAR 06 2009
MAILED FROM ZIP CODE 19103



FILED

APR 16 2009

William A. Shaw
Prothonotary/Clerk of Courts

cc TO Atty
to serve
(60)

IN THE COURT OF COMMON PLEAS
CLEARFIELD COUNTY, PENNSYLVANIA

LASALLE BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR THE C-BASS MORTGAGE
LOAN ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2

Plaintiff

v.

MARIE H. SNYDER
JAMES W. SNYDER

Defendants

Court of Common Pleas
Civil Division
CLEARFIELD County
No. 2008-2049-CD

ORDER

AND NOW, this 16 day of April, 2009 the Prothonotary is ORDERED to
amend the in rem judgment and the Sheriff is ORDERED to amend the writ nunc pro tunc in this
case as follows:

Principal Balance	\$186,058.07
Interest Through May 1, 2009	\$20,115.37
Per Diem \$45.24	
Late Charges	\$1,586.68
Legal fees	\$1,300.00
Cost of Suit and Title	\$1,445.00
Sheriff's Sale Costs	\$0.00
Property Inspections/ Property Preservation	\$50.00
Appraisal/Brokers Price Opinion	\$0.00
Mortgage Insurance Premium /	\$0.00
Private Mortgage Insurance	
Non Sufficient Funds Charge	\$0.00

Suspense/Misc. Credits
Escrow Deficit

(\$0.00)
\$5,736.47

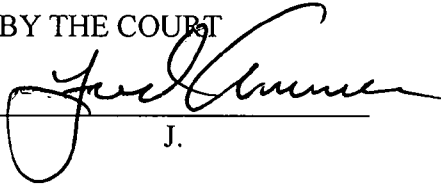
TOTAL

\$216,291.59

Plus interest from May 1, 2009 through the date of sale at six percent per annum.

Note: The above figure is not a payoff quote. Sheriff's commission is not included in the above figure.

BY THE COURT


J.

185611

FILED

0 10:46 a.m. GK

APR 16 2009

William A. Shaw
Prothonotary/Clerk of Courts

NO CC

50

PHELAN HALLINAN & SCHMIEG, LLP

by: Michele M. Bradford, Esquire, Atty. I.D. No. 69849

1617 John F. Kennedy Boulevard, Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

ATTORNEY FOR PLAINTIFF

LASALLE BANK NATIONAL ASSOCIATION,
AS TRUSTEE FOR THE C-BASS MORTGAGE
LOAN ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2

Plaintiff

Court of Common Pleas

Civil Division

CLEARFIELD County

v.

No. 2008-2049-CD

MARIE H. SNYDER

JAMES W. SNYDER

Defendants

PRAECIPE

TO THE PROTHONOTARY:

Please amend the judge amount pursuant to Court Order dated April 16, 2009.

DATE: 4/16/09

By:

Phelan Hallinan & Schmieg, LLP

Michele M. Bradford, Esquire
Attorney for Plaintiff



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20930
NO: 08-2049-CD

PLAINTIFF: LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES 2007-SP2

vs.

DEFENDANT: MARIE H. SNYDER AND JAMES W. SNYDER

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 2/13/2009

LEVY TAKEN 3/26/2009 @ 1:44 PM

POSTED 3/26/2009 @ 1:44 PM

SALE HELD

SOLD TO

SOLD FOR AMOUNT PLUS COSTS

WRIT RETURNED 1/8/2010

DATE DEED FILED **NOT SOLD**

FILED
01/20/2010
JAN 08 2010
William A. Shaw
Prothonotary/Clerk of Courts

DETAILS

3/26/2009 @ 1:44 PM SERVED MARIE H. SNYDER

SERVED MARIE H. SNYDER, DEFENDANT, AT HER RESIDENCE 3468 CHESTNUT GROVE HIGHWAY, GRAMPIAN, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JAMES SNYDER, 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.

3/26/2009 @ 1:44 PM SERVED JAMES W. SNYDER

SERVED JAMES W. SNYDER, DEFENDANT, AT HIS RESIDENCE 3468 CHESTNUT GROVE HIGHWAY, GRAMPIAN, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JAMES SNYDER

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

@ SERVED

NOW, APRIL 29, 2009 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED FOR MAY 1, 2009 TO AUGUST 7, 2009.

@ SERVED

NOW, SEPTEMBER 1, 2009 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO STAY THE SHERIFF SALE SCHEDULED FOR SEPTEMBER 4, 2009.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20930

NO: 08-2049-CD

PLAINTIFF: LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES 2007-SP2

VS.

DEFENDANT: MARIE H. SNYDER AND JAMES W. SNYDER

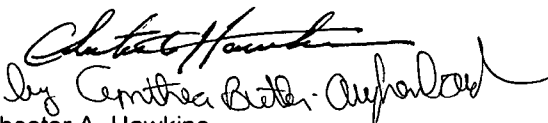
Execution REAL ESTATE

SHERIFF RETURN

SHERIFF HAWKINS \$239.26

SURCHARGE \$40.00 PAID BY ATTORNEY

So Answers,


Chester A. Hawkins
Sheriff

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

LASALLE BANK NATIONAL
ASSOCIATION, AS TRUSTEE FOR
THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES,
SERIES 2007-SP2

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

No.
No. 2008-2049-CD
No.

WRIT OF EXECUTION
(Mortgage Foreclosure)

vs.

MARIE H. SNYDER

JAMES W. SNYDER

Commonwealth of Pennsylvania:

County of Clearfield

TO THE SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA:

PREMISES: 3468 CHESTNUT GROVE HIGHWAY, GRAMPIAN, PA 16838-9014
(See Legal Description attached)

Amount Due

Prothonotary costs \$202,241.47
135.00

Interest from 12/31/08 to Sale

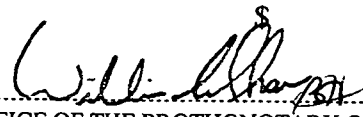
\$ _____

Per diem \$33.25

Add'l Costs

\$3,343.50

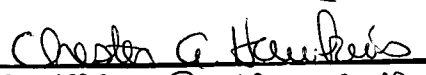
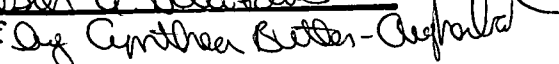
Writ Total


OFFICE OF THE PROTHONOTARY OF CLEARFIELD
COUNTY, PENNSYLVANIA

Dated 2/13/09
(SEAL)

Received this writ this 13th day
of February A.D. 2009
at 2:00 A.M./P.M.

185611


Sheriff 

No. 2008-2049-CD.....

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA

LASALLE BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR THE C-BASS MORTGAGE LOAN
ASSET-BACKED CERTIFICATES, SERIES 2007-SP2

vs.

MARIE H. SNYDER
JAMES W. SNYDER

WRIT OF EXECUTION
(Mortgage Foreclosure)

	Costs
Real Debt	\$202,241.47

Int. from 12/31/08
To Date of Sale (\$33.25 per diem)

Costs	<hr/>
Prothy Pd.	<u>135.00</u>

Sheriff

Daniel H. Schmiege
DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Address: MARIE H. SNYDER 3468 CHESTNUT GROVE HIGHWAY GRAMPIAN, PA 16838-9014	JAMES W. SNYDER 3468 CHESTNUT GROVE HIGHWAY GRAMPIAN, PA 16838-9014
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LEGAL DESCRIPTION

ALL those two certain pieces or parcels of land, with improvements thereon, situate in the Township of Bloom, County of Clearfield and State of Pennsylvania, bounded and described as follows:

THE FIRST THEREOF: BEGINNING at a point on Highway Route 322, where Jeff Thomas' land meets the Dufour land; thence back from the said highway along the Jeff Thomas line, a distance of 420 feet to a point; thence towards DuBois and parallel to the highway Route 322, a distance of 70 feet to other lands of Dufour; thence along other lands of Dufour and parallel to Jeff Thomas land, a distance of 420 feet to right of way of State Highway Route 322; thence along Highway Route 322 in direction of Clearfield, a distance of 70 feet to a point and place of beginning.

The said premises having been surveyed are described as follows:

BEGINNING at an iron pin on the Eastern line of Pennsylvania State Highway Route No. 219 and Northwest corner of lands of Jeanine Thomas; thence South 79 degrees 10 minutes East 408.5 feet along line of Jeanine Thomas to an iron pin on line now or formerly of Arthur Dufour; thence along said Dufour line North 7 degrees 45 minutes East 64.03 feet to a pin; thence North 79 degrees 10 minutes West 433.75 feet to an iron pin on Eastern line of Pennsylvania State Highway Route No. 219; thence along said Pennsylvania State Highway Route 219 South 13 degrees 30 minutes East 70 feet to an iron pin and place of beginning. Containing 0.618 acres, more or less.

RESERVING, from the above described premises, however, all of the coal, fire clay, oil, gas and other minerals with all rights necessary and convenient for the removal of the same without liability for damages of any kind or character.

THE SECOND THEREOF: BEGINNING at an iron pin on the Eastern side of Pennsylvania State Highway Legislative Route No. 59, Traffic Route U. S. No. 219 running from Grampian to Chestnut Grove, said iron pin being at the Northwest corner of land purchased by James & Vonnie Snyder from Jack & Patricia McCall and being also North 13 degrees 30 minutes West 548 feet from an old iron pin of land of Jeanine Thomas where it joins land formerly of Chauncey Derrick at the Eastern side of the above mentioned highway; thence from said beginning iron pin, North 13 degrees 30 minutes West for a distance of 80 feet along the Eastern side of said highway to an iron pin; thence through the lands of Eva McCall Nolder and Robert L. Nolder for a new line South 79 degrees 10 minutes East for a distance of 462.6 feet to an iron pin on line of lands formerly of Arthur Dufour; thence by said land South 7 degrees 45 minutes West for a distance of 73.17 feet to an iron pin; thence by land of the former grantees recently purchased from Jack McCall and Patricia McCall, North 79 degrees 10 minutes West for a distance of 433.75 feet to an iron pin and place of beginning. Containing 0.751 acres.

EXCEPTING from the above all fire, clay, oil and gas and all other minerals reserved in prior deeds.

BEING the same premises conveyed to James W. Snyder by Deed of James W. Snyder and Vonnie L. Snyder, husband and wife, dated the 10th day of October, 1980, as recorded in Deed Book Volume 803, Page 411.

PARCEL IDENTIFICATION NO: 104-F09-000-00083, CONTROL #: 104094642
104-F09-000-00075, CONTROL #: 104094641

TITLE TO SAID PREMISES IS VESTED IN James W. Snyder and Marie H. Snyder, h/w, as tenants by the entireties and not as tenants common, by Deed from James W. Snyder and Marie H. Snyder, h/w, dated 10/31/1992, recorded 11/04/1992 in Book 1494, Page 361.

Premises being: 3468 CHESTNUT GROVE HIGHWAY
GRAMPIAN, PA 16838-9014

**REAL ESTATE SALE
SCHEDULE OF DISTRIBUTION**

NAME MARIE H. SNYDER

NO. 08-2049-CD

NOW, January 08, 2010, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on September 04, 2009, I exposed the within described real estate of Marie H. Snyder And James W. Snyder to public venue or outcry at which time and place I sold the same to he/she being the highest bidder, for the sum of and made the following appropriations, viz:

SHERIFF COSTS:

RDR	15.00
SERVICE	15.00
MILEAGE	13.20
LEVY	15.00
MILEAGE	13.20
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	7.86
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID/SETTLEMENT AMOUNT	
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	40.00
MISCELLANEOUS	
TOTAL SHERIFF COSTS	\$239.26

DEED COSTS:

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

PLAINTIFF COSTS, DEBT AND INTEREST:

DEBT-AMOUNT DUE	202,241.47
INTEREST @ 33.2500	8,212.75
FROM 12/31/2008 TO 09/04/2009	
ATTORNEY FEES	
PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	40.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	
TOTAL DEBT AND INTEREST	\$210,494.22

COSTS:

ADVERTISING	709.75
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	200.00
ACKNOWLEDGEMENT	
DEED COSTS	0.00
SHERIFF COSTS	239.26
LEGAL JOURNAL COSTS	459.00
PROTHONOTARY	135.00
MORTGAGE SEARCH	80.00
MUNICIPAL LIEN	
TOTAL COSTS	\$1,823.01

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

CHESTER A. HAWKINS, Sheriff

Phelan Hallinan & Schmieg, L.L.P.
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Fax: (215) 563-7009

Representing Lenders in
Pennsylvania and New Jersey

Foreclosure Manager

April 29, 2009

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

Attn: Real Estate Department

Fax Number: 814-765-5915

Re: LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE C-
BASS MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-
SP2 v.
MARIE H. SNYDER and JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY GRAMPIAN, PA 16838-9014
Court No. 2008-2049-CD

Dear Sir/Madam:

Please Postpone the Sheriff Sale of the above referenced property, which is
scheduled for May 1, 2009 due to the following: Bankruptcy.

The Property is to be relisted for the August 7, 2009 Sheriff Sale.

Thank you for your correspondence in this matter.

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

Phelan Hallinan & Schmieg, L.L.P.
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000
Fax: (215) 563-7009

Representing Lenders in
Pennsylvania and New Jersey

Foreclosure Manager

September 1, 2009

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

Attn: Real Estate Department
Fax Number: 814-765-5915

Re: LASALLE BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR THE C-
BASS MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-
SP2 v.
MARIE H. SNYDER and JAMES W. SNYDER
3468 CHESTNUT GROVE HIGHWAY GRAMPIAN, PA 16838-9014
Court No. 2008-2049-CD

Dear Sir/Madam:

Please STAY the Sheriff's Sale of the above referenced property, which is
scheduled for September 4, 2009 due to the following: Loan Modification review.

\$0.00 was received in consideration of the stay.

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

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

Thank you for your cooperation in this matter.

Very Truly Yours,
ELIZABETH HALLINAN for
Phelan Hallinan & Schmieg, LLP