

08-2179-CD  
HSBC Bank vs Christopher Endicott et al

by the requester. Providing an erroneous name or SSN will cause an erroneous certificate to be provided.

*Report ID:BPUEVLTPDFC*

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  
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

ATTORNEY FOR PLAINTIFF

S  
**FILED** Any pd.  
m 12:28 PM 95.00  
NOV 12 2008  
William A. Shaw  
Prothonotary/Clerk of Courts  
400 Sheriff

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1  
4708 Mercantile Drive  
Ft. Worth, TX 76137  
Plaintiff  
v.

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

Christopher M. Endicott  
Michelle L. Endicott  
22 Ponderosa Drive  
Penfield, PA 15849  
Defendant(s)

NO. 08-2179-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 County 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 defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademàs, 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 County 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: New Century Mortgage Corporation

Assignments of Record to: Deutsche Bank Trust Company Americas, as Trustee and Custodian for HSBC Bank USA, NA ACE 2006-NCI By: Saxon Mortgage Services, Inc. as its attorney-in-fact

Recording Date: 5/7/07 Instrument No: 200707557

Assignor: Deutsche Bank Trust Company Americas, as Trustee and Custodian for HSBC Bank USA, NA ACE 2006-NCI By: Saxon Mortgage Services, Inc. as its attorney-in-fact

Assignee: HSBC Bank USA, National Association, as Trustee for ACE 2006-NC1

Recording Date: **LODGED FOR RECORDING**

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: 315 Pennsylvania Avenue

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Clearfield

COUNTY: Clearfield

DATE EXECUTED: 9/30/05

DATE RECORDED: 10/5/05 INSTRUMENT NO: 200516754

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 11/4/08:

Principal of debt due	\$57,444.74
Unpaid Interest at 9.175%* from 6/1/08 to 11/4/08 (the per diem interest accruing on this debt is \$14.44 and that sum should be added each day after 11/4/08)	2,239.37
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$23.92 should be added in accordance with the terms of the note each month after 11/4/08)	119.60
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,872.24</u>
TOTAL	\$63,280.95

**\*This interest rate is subject to adjustment as more fully set forth in the Note and Mortgage.**

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 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 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, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$63,280.95 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 lot or ground, together with the improvements thereon, situate in the Borough of Clearfield, County of Clearfield and State of Pennsylvania, and known in the Home Builders' plan of lots in said Borough as Lot No. 24, being bounded and described as follows:

On the north by Pennsylvania Avenue; on the East by Lot No. 25; on the south by a twelve foot public alley; on the west by lot No. 23; being fifty feet front on Pennsylvania Avenue and extending in depth one hundred feet to an alley.

BEING designated as Map # 4.2-K08-224-4 in the records of the Deed Registry Office of Clearfield County, Pennsylvania.

BEING the same premises conveyed to John D. Freeman and A. Johanna Freeman, as tenants by the entireties, from Frank C. Buck, Jr. and Marjorie J. Buck, his wife, by deed dated February 6, 1948 and recorded February 6, 1948, in the Clearfield County Recorder of Deeds Office in Deed Book Volume 388, page 593. John D. Freeman died on January 13, 1986 thereby vesting all interest to his wife, A. Johanna Freeman.

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: 08-2179-CD

HSBC BANK USA, NATIONAL ASSOCIATION, TRUSTEE

vs

SERVICE # 1 OF 4

CHRISTOPHER M. ENDICOTT, MICHELLE L. ENDICOTT

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 12/12/2008

HEARING:

PAGE: 104917

DEFENDANT: CHRISTOPHER M. ENDICOTT

ADDRESS: 315 PENNSYLVANIA AVENUE

CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

House Empty

**SHERIFF'S RETURN**

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON CHRISTOPHER M. ENDICOTT, 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 CHRISTOPHER M. ENDICOTT

AT (ADDRESS) \_\_\_\_\_

NOW 12-16-08 AT 8<sup>15</sup> (AM) / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO CHRISTOPHER M. ENDICOTT

REASON UNABLE TO LOCATE NOT FOUND HOUSE EMPTY

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy S. Hunter  
Deputy Signature

S. Hunter  
Print Deputy Name

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

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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

WE HEREBY CERTIFY THE  
WITHIN TO BE A TRUE AND  
CORRECT COPY OF THE ORIGINAL

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1  
4708 Mercantile Drive  
Ft. Worth, TX 76137

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
22 Ponderosa Drive  
Penfield, PA 15849

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION

Clearfield County

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

NOV 12 2008

NO. 08-2179-CD

Attest.

*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 County Courthouse  
Clearfield, PA 16830  
814-765-2641 x 5982

**AVISO**

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

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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.  
/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:

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Recording Date: 5/7/07 Instrument No: 200707557

Assignor: Deutsche Bank Trust Company Americas, as Trustee and Custodian for HSBC Bank USA, NA ACE 2006-NCI By: Saxon Mortgage Services, Inc. as its attorney-in-fact

Assignee: HSBC Bank USA, National Association, as Trustee for ACE 2006-NCI

Recording Date: **LODGED FOR RECORDING**

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: 315 Pennsylvania Avenue

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Clearfield

COUNTY: Clearfield

DATE EXECUTED: 9/30/05

DATE RECORDED: 10/5/05 INSTRUMENT NO: 200516754

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 11/4/08:

Principal of debt due	\$57,444.74
Unpaid Interest at 9.175%* from 6/1/08 to 11/4/08 (the per diem interest accruing on this debt is \$14.44 and that sum should be added each day after 11/4/08)	2,239.37
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$23.92 should be added in accordance with the terms of the note each month after 11/4/08)	119.60
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,872.24</u>
TOTAL	\$63,280.95

**\*This interest rate is subject to adjustment as more fully set forth in the Note and Mortgage.**

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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 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 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, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$63,280.95 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 lot or ground, together with the improvements thereon, situate in the Borough of Clearfield, County of Clearfield and State of Pennsylvania, and known in the Home Builders' plan of lots in said Borough as Lot No. 24, being bounded and described as follows:

On the north by Pennsylvania Avenue; on the East by Lot No. 25; on the south by a twelve foot public alley; on the west by lot No. 23; being fifty feet front on Pennsylvania Avenue and extending in depth one hundred feet to an alley.

BEING designated as Map # 4.2-K08-224-4 in the records of the Deed Registry Office of Clearfield County, Pennsylvania.

BEING the same premises conveyed to John D. Freeman and A. Johanna Freeman, as tenants by the entirety, from Frank C. Buck, Jr. and Marjorie J. Buck, his wife, by deed dated February 6, 1948 and recorded February 6, 1948, in the Clearfield County Recorder of Deeds Office in Deed Book Volume 388, page 593. John D. Freeman died on January 13, 1986 thereby vesting all interest to his wife, A. Johanna Freeman.

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: 08-2179-CD

HSBC BANK USA, NATIONAL ASSOCIATION, TRUSTEE

vs

SERVICE # 2 OF 4

CHRISTOPHER M. ENDICOTT, MICHELLE L. ENDICOTT

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 12/12/2008

HEARING:

PAGE: 104917

DEFENDANT:

MICHELLE L. ENDICOTT

ADDRESS:

315 PENNSYLVANIA AVENUE

CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

House Empty

**SHERIFF'S RETURN**

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON MICHELLE L. ENDICOTT, 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 L. ENDICOTT

AT (ADDRESS) \_\_\_\_\_

NOW 12-16-08 AT 8<sup>15</sup> (AM) / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO MICHELLE L. ENDICOTT

REASON UNABLE TO LOCATE NOT FOUND HOUSE EMPTY

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy S. Hunter  
Deputy Signature

S. Hunter

Print Deputy Name

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

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](mailto:pleadings@udren.com)

ATTORNEY FOR PLAINTIFF

WE HEREBY CERTIFY THE  
WITHIN TO BE A TRUE AND  
CORRECT COPY OF THE ORIGINAL

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

4708 Mercantile Drive

Ft. Worth, TX 76137

Plaintiff

v.

Christopher M. Endicott

Michelle L. Endicott

22 Ponderosa Drive

Penfield, PA 15849

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION

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

NOV 12 2008

NO. 08-2179-CD

Attest.

*William A. Brown*  
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 County 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 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. Meholic  
Court Administrator  
Clearfield County 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: New Century Mortgage Corporation

Assignments of Record to: Deutsche Bank Trust Company Americas, as Trustee and Custodian for HSBC Bank USA, NA ACE 2006-NCI By: Saxon Mortgage Services, Inc. as its attorney-in-fact

Recording Date: 5/7/07 Instrument No: 200707557

Assignor: Deutsche Bank Trust Company Americas, as Trustee and Custodian for HSBC Bank USA, NA ACE 2006-NCI By: Saxon Mortgage Services, Inc. as its attorney-in-fact

Assignee: HSBC Bank USA, National Association, as Trustee for ACE 2006-NCI

Recording Date: **LODGED FOR RECORDING**

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: 315 Pennsylvania Avenue

MUNICIPALITY/TOWNSHIP/BOROUGH: Borough of Clearfield

COUNTY: Clearfield

DATE EXECUTED: 9/30/05

DATE RECORDED: 10/5/05 INSTRUMENT NO: 200516754

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 11/4/08:

Principal of debt due	\$57,444.74
Unpaid Interest at 9.175%* from 6/1/08 to 11/4/08 (the per diem interest accruing on this debt is \$14.44 and that sum should be added each day after 11/4/08)	2,239.37
Title Report	325.00
Court Costs (anticipated, excluding Sheriff's Sale costs)	280.00
Late Charges (monthly late charge of \$23.92 should be added in accordance with the terms of the note each month after 11/4/08)	119.60
Attorneys Fees (anticipated and actual to 5% of principal)	<u>2,872.24</u>
TOTAL	\$63,280.95

**\*This interest rate is subject to adjustment as more fully set forth in the Note and Mortgage.**

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 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 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, the Plaintiff demands judgment, in rem, against the Defendant(s) herein in the sum of \$63,280.95 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 lot or ground, together with the improvements thereon, situate in the Borough of Clearfield, County of Clearfield and State of Pennsylvania, and known in the Home Builders' plan of lots in said Borough as Lot No. 24, being bounded and described as follows:

On the north by Pennsylvania Avenue; on the East by Lot No. 25; on the south by a twelve foot public alley; on the west by lot No. 23; being fifty feet front on Pennsylvania Avenue and extending in depth one hundred feet to an alley.

BEING designated as Map # 4.2-K08-224-4 in the records of the Deed Registry Office of Clearfield County, Pennsylvania.

BEING the same premises conveyed to John D. Freeman and A. Johanna Freeman, as tenants by the entireties, from Frank C. Buck, Jr. and Marjorie J. Buck, his wife, by deed dated February 6, 1948 and recorded February 6, 1948, in the Clearfield County Recorder of Deeds Office in Deed Book Volume 388, page 593. John D. Freeman died on January 13, 1986 thereby vesting all interest to his wife, A. Johanna Freeman.

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: 08-2179-CD

HSBC BANK USA, NATIONAL ASSOCIATION, TRUSTEE

VS

SERVICE # 4 OF 4

CHRISTOPHER M. ENDICOTT, MICHELLE L. ENDICOTT

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 12/12/2008

HEARING:

PAGE: 104917

DEFENDANT: MICHELLE L. ENDICOTT

ADDRESS: 22 PONDEROSA DRIVE

PENFIELD, PA 15849

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

**SHERIFF'S RETURN**

NOW, 12-02-08 AT 2:50 AM ☒ SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON MICHELLE L. ENDICOTT, DEFENDANT

BY HANDING TO Christopher Endicott / DEFENDANT'S HUSBAND

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

ADDRESS SERVED 22 Ponderosa Drive, Penfield, PA.

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

COMPLAINT IN MORTGAGE FORECLOSURE FOR MICHELLE L. ENDICOTT

AT (ADDRESS) \_\_\_\_\_

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

I MAKE RETURN OF **NOT FOUND** AS TO MICHELLE L. ENDICOTT

REASON UNABLE TO LOCATE \_\_\_\_\_

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

*Mark A. Conner*  
Deputy Signature

Mark A. Conner  
Print Deputy Name

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2179-CD

HSBC BANK USA, NATIONAL ASSOCIATION, TRUSTEE

vs

SERVICE # 3 OF 4

CHRISTOPHER M. ENDICOTT, MICHELLE L. ENDICOTT

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 12/12/2008

HEARING:

PAGE: 104917

DEFENDANT: CHRISTOPHER M. ENDICOTT

ADDRESS: 22 PONDEROSA DRIVE

PENFIELD, PA 15849

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

**SHERIFF'S RETURN**

NOW, 12-22-08 AT 2:50 AM/PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON CHRISTOPHER M. ENDICOTT, DEFENDANT

BY HANDING TO Christopher Endicott / DEFENDANT

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

ADDRESS SERVED 22 Ponderosa Drive, Penfield, PA

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

COMPLAINT IN MORTGAGE FORECLOSURE FOR CHRISTOPHER M. ENDICOTT

AT (ADDRESS) \_\_\_\_\_

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

I MAKE RETURN OF **NOT FOUND** AS TO CHRISTOPHER M. ENDICOTT

REASON UNABLE TO LOCATE \_\_\_\_\_

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

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  
WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400  
pleadings@udren.com

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-2179-CD

**PRAECIPE FOR WRIT OF EXECUTION**

**TO THE PROTHONOTARY:**

Please issue Writ of Execution in the above matter:

Amount due

\$64,195.15

Interest From 11/4/09

to Date of Sale \_\_\_\_\_

Ongoing Per Diem of \$14.44

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

(Costs to be added)

\$ \_\_\_\_\_

Prothonotary costs 135.00

UDREN LAW OFFICES, P.C.

BY: [Signature]

Attorneys for Plaintiff

MARK J. UDREN, ESQUIRE

STUART WINNEG, ESQUIRE

LORRAINE DOYLE, ESQUIRE

ALAN M. MINATO, ESQUIRE

CHANDRA M. ARKEMA, ESQUIRE

**FILED**

JAN 05 2009

William A. Shaw  
Prothonotary/Clerk of Courts

*Any pd. 2000*  
*ice 06 writs w/prop. desc.*  
*to 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

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-2179-CD

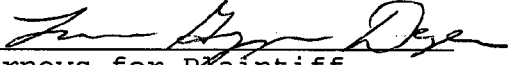
### C E R T I F I C A T E

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

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

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

Plaintiff

v.

Christopher M. Endicott

Michelle L. Endicott

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-2179-CD

AFFIDAVIT PURSUANT TO RULE 3129.1

HSBC Bank USA, National Association, as Trustee for ACE 2006-NC1, 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: 315 Pennsylvania Avenue, Clearfield, PA 16830

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

Name	Address
------	---------

Christopher M. Endicott	22 Ponderosa Drive Penfield, PA 15849
-------------------------	--

Michelle L. Endicott	22 Ponderosa Drive Penfield, PA 15849
----------------------	--

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
------	---------

HSBC Bank USA, National Association, as Trustee for ACE 2006-NC1	4708 Mercantile Drive Ft. Worth, TX 76137
--	--

A. Johanna Freeman a/k/a  
Augusta Johanna Freeman

Address to follow

Keystone Thermal Gard

1109 E. Walton Avenue  
Altoona, PA 16602

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

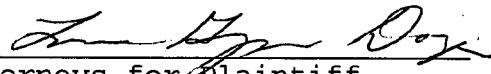
Tenants/Occupants

315 Pennsylvania Avenue  
Clearfield, PA 16830

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: January 3, 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.  
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

COPY

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-2179-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:

315 Pennsylvania Avenue  
Clearfield, PA 16830  
SEE LEGAL DESCRIPTION ATTACHED

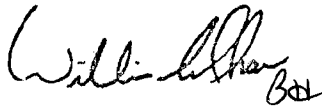
Amount due \$64,195.15

Interest From 11/4/09  
to Date of Sale \_\_\_\_\_  
Ongoing Per Diem of \$14.44  
to actual date of sale including if sale is  
held at a later date

(Costs to be added)

\$ \_\_\_\_\_  
Prothonotary costs 135.00  
Prothonotary

By



Clerk

Date 11/5/09

COURT OF COMMON PLEAS  
NO. 08-2179-CD

=====

HSBC Bank USA, National Association, as Trustee for ACE 2006-NC1  
vs.  
Christopher M. Endicott  
Michelle L. Endicott

=====

WRIT OF EXECUTION

=====

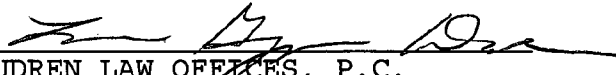
REAL DEBT \$ 64,195.15

INTEREST \$ \_\_\_\_\_  
from 11/4/09  
to Date of Sale \_\_\_\_\_  
*Ongoing Per Diem of \$14.44*  
*to actual date of sale including if sale is*  
*held at a later date*

COSTS PAID:  
PROTHY \$ 135.00  
  
SHERIFF \$ \_\_\_\_\_  
  
STATUTORY \$ \_\_\_\_\_

COSTS DUE PROTHY. \$ \_\_\_\_\_

PREMISES TO BE SOLD:  
315 Pennsylvania Avenue  
Clearfield, PA 16830

  
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 lot or ground, together with the improvements thereon, situate in the Borough of Clearfield, County of Clearfield and State of Pennsylvania, and known in the Home Builders' plan of lots in said Borough as Lot No. 24, being bounded and described as follows:

On the north by Pennsylvania Avenue; on the East by Lot No. 25; on the south by a twelve foot public alley; on the west by lot No. 23; being fifty feet front on Pennsylvania Avenue and extending in depth one hundred feet to an alley.

BEING designated as Map # 4.2-K08-224-4 in the records of the Deed Registry Office of Clearfield County, Pennsylvania.

BEING the same premises conveyed to John D. Freeman and A. Johanna Freeman, as tenants by the entireties, from Frank C. Buck, Jr. and Marjorie J. Buck, his wife, by deed dated February 6, 1948 and recorded February 6, 1948, in the Clearfield County Recorder of Deeds Office in Deed Book Volume 388, page 593. John D. Freeman died on January 13, 1986 thereby vesting all interest to his wife, A. Johanna Freeman.

BEING KNOWN AS: 315 Pennsylvania Avenue, Clearfield, PA 16830

PROPERTY ID NO.: 4-2-6-8-224-4

TITLE TO SAID PREMISES IS VESTED IN CHRISTOPHER M. ENDICOTT AND MICHELLE L. ENDICOTT HUSBAND AND WIFE BY DEED FROM A. JOHANNA FREEMAN, UNREMARIED WIDOW DATED 9/30/2005 RECORDED 10/05/2005 INSTRUMENT NO. 200516753.

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

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1  
4708 Mercantile Drive  
Ft. Worth, TX 76137  
Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
22 Ponderosa Drive  
Penfield, PA 15849  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County  
MORTGAGE FORECLOSURE

NO. 08-2179-CD

FILED  
JAN 05 2009

William A. Shaw  
Prothonotary/Clerk of Courts

Atty pd.  
20.00  
Notice  
to Defs.  
Statement to  
Atty

**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) **Christopher M. Endicott and Michelle L. Endicott** 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	\$63,280.95
Interest Per Complaint	866.40
From 11/5/08 to 1/3/09	
Late charges per Complaint	47.80
From 11/5/08 to 1/3/09	
TOTAL	<u>\$64,195.15</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: [Signature]  
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: January 5, 2009

[Signature]  
PRO PROTHY

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

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](mailto:pleadings@udren.com)

ATTORNEY FOR PLAINTIFF

FILED

NOV 12 2008

William A. Shaw  
Prothonotary/Clerk of Courts

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1  
4708 Mercantile Drive  
Ft. Worth, TX 76137

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
22 Ponderosa Drive  
Penfield, PA 15849

Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION

Clearfield County

NO. 08-279-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 County Courthouse  
Clearfield, PA 16830  
814-765-2641 x 5982

08110039-1  
COPY

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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WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003  
856-669-5400  
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

HSBC Bank USA, National Association, as  
Trustee for ACE 2006-NC1  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

NO. 08-2179-CD

TO: Christopher M. Endicott  
22 Ponderosa Drive  
Penfield, PA 15849

Date of Notice: December 23, 2008

**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.

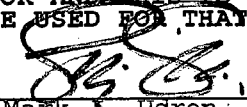
LAWYER REFERRAL SERVICE  
David S. Meholick  
Court Administrator  
Clearfield County Courthouse  
Clearfield, PA 16830  
814-765-2641 x 5982

**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 County 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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WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003  
856-669-5400  
pleadings@udren.com

ATTORNEY FOR PLAINTIFF

HSBC Bank USA, National Association, as  
Trustee for ACE 2006-NC1  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

NO. 08-2179-CD

TO: Michelle L. Endicott  
22 Ponderosa Drive  
Penfield, PA 15849

Date of Notice: December 23, 2008

**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 County Courthouse  
Clearfield, PA 16830  
814-765-2641 x 5982

**NOTIFICACION IMPORTANTE**

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SERVICIO DE REFERENCIA LEGAL  
LAWYER REFERRAL SERVICE  
David S. Meholick  
Court Administrator  
Clearfield County 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.

  
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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.

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

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-2179-CD

AFFIDAVIT OF NON-MILITARY SERVICE

STATE OF NEW JERSEY

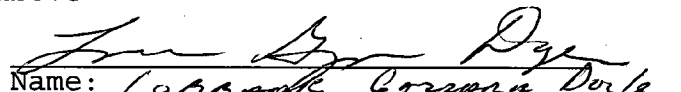
:  
:  
SS  
:

COUNTY OF CAMDEN

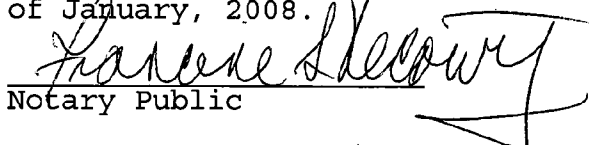
THE UNDERSIGNED being duly sworn, deposes and says that the averments herein are based upon investigations made and records maintained by us either as Plaintiff or as servicing agent of the Plaintiff herein and that the above Defendant(s) are not in the Military or Naval Service of the United States of America or its Allies as defined in the Servicemembers' Civil Relief Act (108 P.L. 189; 117 Stat. 2835; 2003 Enacted H.R. 100), and that the age and last known residence and employment of each Defendant are as follows:

Defendant: Michelle L. Endicott  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

Defendant: Christopher M. Endicott  
Age: Over 18  
Residence: As captioned above  
Employment: Unknown

  
Name: Lorraine Corcoran Doyle  
Title: ATTORNEY FOR PLAINTIFF  
Company: UDREN LAW OFFICES, P.C.

Sworn to and subscribed  
before me this 3rd day  
of January, 2008.

  
Notary Public

*Francine S. Necowitz*  
Notary Public  
State of New Jersey  
My Commission Expires 12/20/13

FILED

JAN 05 2009

William A. Shaw  
Prothonotary/Clerk of Courts

Shaw, William A.  
Prothonotary/Clerk of Courts  
1000 Market Street  
Philadelphia, PA 19107

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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WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400  
pleadings@udren.com

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-2179-CD

TO: Michelle L. Endicott  
22 Ponderosa Drive  
Penfield, PA 15849

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.

*William J. Hays*  
Prothonotary 11/5/09

- ☒ 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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WOODCREST CORPORATE CENTER  
111 WOODCREST ROAD, SUITE 200  
CHERRY HILL, NJ 08003-3620  
856-669-5400  
pleadings@udren.com

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-2179-CD

TO: Christopher M. Endicott  
22 Ponderosa Drive  
Penfield, PA 15849

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.

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

*Prothonotary* 11/5/09

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

COPIES

HSBC Bank USA, National Association  
Plaintiff(s)

No.: 2008-02179-CD

Real Debt: \$64,195.15

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

Entry: \$20.00

Instrument: Default Judgment

Date of Entry: January 5, 2009

Expires: January 5, 2014

Certified from the record this 5th day of January, 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  
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

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County 5

William A. Shaw  
Prothonotary/Clerk of Courts

NO. 08-2179-CD

FILED *no cc*  
m/12:55 PM  
JAN 05 2009 @

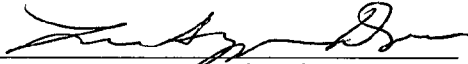
**PRAECIPE TO SUBSTITUTE VERIFICATION**

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: January 3, 2009

UDREN LAW OFFICES, P.C.

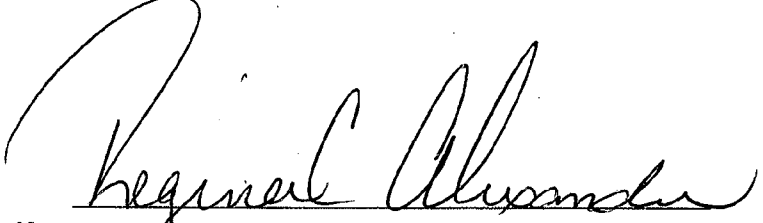
BY:   
Attorneys for Plaintiff  
MARK J. UDREN, ESQUIRE  
STUART WINNEG, ESQUIRE  
LORRAINE DOYLE, ESQUIRE  
ALAN M. MINATO, ESQUIRE  
CHANDRA M. ARKEMA, ESQUIRE

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

The undersigned, an officer of the Corporation which is the Plaintiff in the foregoing Complaint or an officer 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 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: 11.13.08

  
Name: Regina C. Alexander  
Title: Senior Manager  
Company: Saxon Mortgage Services, Inc. as  
servicer on behalf of HSBC Bank USA,  
National Association, as Trustee for  
ACE 2006-NC1

Christopher M. Endicott  
Michelle L. Endicott  
Loan #2000151840  
MJU #08110039-1



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

CHANDRA M. ARKEMA, ESQUIRE - ID #203437

WOODCREST CORPORATE CENTER

111 WOODCREST ROAD, SUITE 200

CHERRY HILL, NJ 08003-3620

856-669-5400

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1  
4708 Mercantile Drive  
Ft. Worth, TX 76137

Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 08-2179-CD

v.

Christopher M. Endicott

Michelle L. Endicott

22 Ponderosa Drive

Penfield, PA 15849

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: February 25, 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

5 FILED NO CC  
m/12:52  
MAR 12 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

HISBC bank USA, National Association, as trustee, et. al., Plaintiff(s)  
vs.  
Christopher M. Endicott, 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 #: 094984.0001

### AFFIDAVIT OF SERVICE -- Individual

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

Service of Process on:

--Christopher M. Endicott  
Court Case No. 08-2179-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, she was of legal age and was not a party to this action:

Date/Time of Service: that on the 24<sup>th</sup> day of FEBRUARY, 20 09, at 12:50 o'clock PM

Place of Service: at 22 Ponderosa Drive in Pennfield, PA 15849

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:  
Christopher M. Endicott

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  
Christopher M. Endicott  
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 M; Skin Color Cauc; Hair Color Brown; Facial Hair Beard  
Approx. Age 35; Approx. Height 6'0"; Approx. Weight 400 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

24<sup>th</sup> day of February, 20 09

Marilyn A. Campbell  
Notary Public (Commission Expires)  
12-6-11

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal  
Marilyn A. Campbell, Notary Public  
City Of Altoona, Blair County  
My Commission Expires Dec. 6, 2011  
Member, Pennsylvania Association of Notaries

HSBC bank USA, National Association, as trustee, et. al., Plaintiff(s)  
vs.  
Christopher M. Endicott, 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 #: 094984-0001

### 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 L. Endicott  
Court Case No. 08-2179-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 24<sup>th</sup> day of FEBRUARY, 20 09, at 12:50 o'clock P.M.

Place of Service: at 22 Ponderosa Drive, in Penfield, PA 15849

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 L. Endicott

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 L. Endicott  
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 Brown; Facial Hair N/A  
Approx. Age 35 yrs; Approx. Height 5'8"; Approx. Weight 135 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

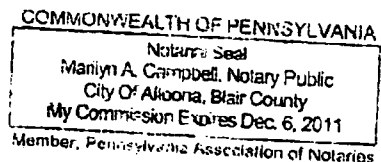
24<sup>th</sup> day of February, 20 09

D.M. Ellis  
Signature of Server

Marilyn A. Campbell  
Notary Public (Commission Expires)

APS International, Ltd.

12-6-11



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104917  
NO: 08-2179-CD  
SERVICES 4  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: HSBC BANK USA, NATIONAL ASSOCIATION, TRUSTEE  
vs.  
DEFENDANT: CHRISTOPHER M. ENDICOTT, MICHELLE L. ENDICOTT

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	UDREN	123033	40.00
SHERIFF HAWKINS	UDREN	123033	54.72

SHERIFF  
0/3:00 Lm  
MAR 23 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

HSBC Bank USA, National  
Association, as Trustee for ACE  
2006-NC1  
4708 Mercantile Drive  
Ft. Worth, TX 76137  
Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
22 Ponderosa Drive  
Penfield, PA 15849  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 08-2179-CD

FILED *no cc*  
M110-2581  
APR 23 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: March 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

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

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-2179-CD

AMENDED AFFIDAVIT PURSUANT TO RULE 3129.1

HSBC Bank USA, National Association, as Trustee for ACE 2006-NC1, 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: 315 Pennsylvania Avenue, Clearfield, PA 16830

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

Christopher M. Endicott 22 Ponderosa Drive  
Penfield, PA 15849

Michelle L. Endicott 22 Ponderosa Drive  
Penfield, PA 15849

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

HSBC Bank USA,  
National Association,  
as Trustee for ACE 2006-NC1

4708 Mercantile Drive  
Ft. Worth, TX 76137

A. Johanna Freeman a/k/a  
Augusta Johanna Freeman

315 Pennsylvania Ave.  
Clearfield, PA 16830

c/o Anna Freeman  
1108 Willow Dr.  
Clearfield, PA 16830

c/o Audry B. Freeman  
108 E. Pauline Dr.  
Clearfield, PA 16830

c/o Bambi D. Freeman  
305 E. Walnut Street  
Clearfield, PA 16830

c/o Deborah A. Freeman  
206 W. Fifth Avenue  
Clearfield, PA 16830

c/o Janet Freeman  
820 Turnpike Ave.  
Clearfield, PA 16380

c/o Joe Freeman  
111 Turnpike Ave.  
Clearfield, PA 16830

c/o John D. Freeman  
4 N. Second Street  
Clearfield, PA 16830

c/o Joseph A. Freeman  
610 Williams Street  
Clearfield, PA 16830

c/o Richard C. Freeman  
308 W. Fifth Ave.  
Clearfield, PA 16830

c/o Robert L. Freeman  
206 W. Fifth Ave.  
Clearfield, PA 16830

c/o Sharon Freeman  
520 Turnpike Ave.  
Clearfield, PA 16830

c/o Susan Freeman  
610 Williams St.  
Clearfield, PA 16830

Keystone Thermal Gard

1109 E. Walton Avenue  
Altoona, PA 16602

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

315 Pennsylvania Avenue  
Clearfield, PA 16830

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: March 13, 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

HSBC Bank USA, National Association,  
as Trustee for ACE 2006-NC1  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

v.

Christopher M. Endicott

Michelle L. Endicott

Defendant(s)

NO. 08-2179-CD

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

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

**OWNER(S):** Christopher M. Endicott  
Michelle L. Endicott

**PROPERTY:** 315 Pennsylvania Avenue  
Clearfield, PA 16830

**Improvements:** RESIDENTIAL DWELLING

The above captioned property is scheduled to be sold at the **Clearfield** County Sheriff's Sale on April 3, 2009, at 10:00 A.M., at the Clearfield County Courthouse, 1 North Second Street, Suite 116. 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 Reg'd.)

Insured Value

Due Sender If COD

R.R. Fee

S.D. Fee

S.H. Fee

Ret. Del. Fee Remarks

COMMONWEALTH OF PA, DEPT. OF REVENUE, BUREAU OF COMPLIANCE  
PO Box 281230, Department of Revenue  
Harrisburg, PA 17128-1230

TENANTS/OCCUPANTS  
315 Pennsylvania Avenue  
Clearfield, PA 16830

HSBC Bank USA  
4708 Mercantile Drive  
Ft. Worth, TX 76137

Keystone Thermal Gard  
1109 E. Walton Avenue  
Altoona, PA 16602

Real Estate Tax Dept.  
1 North Second Street, Suite 116  
Clearfield, PA 16830

Domestic Relations Section  
1 North Second Street, Suite 116  
Clearfield, PA 16830

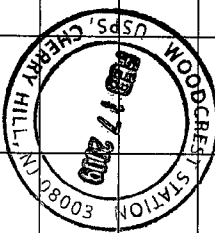
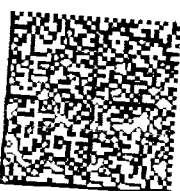
016H26519216

\$03.80

02/17/2009

Mailed From 08003  
US POSTAGE

Hasler



EXPIRED

Total number of Pieces Listed by Sender	Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstruction insurance is \$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 R800, S813, 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.							
6	6	AK								

PS Form 3877, February 1994

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

Christopher M. Endicott  
Michelle L. Endicott; #08110039-1 (Clearfield)

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

Ret. Del. Fee Refunds

1 A. Johanna Freeman a/k/a Augusta Johanna Freeman  
315 Pennsylvania Ave  
Clearfield, PA 16830

2 A. Johanna Freeman  
c/o Anna Freeman  
1108 Willow Dr.  
Clearfield, PA 16830

3 A. Johanna Freeman  
c/o Audry B. Freeman  
108 E. Pauline Dr.  
Clearfield, PA 16830

4 A. Johanna Freeman  
c/o Bambi D. Freeman  
305 E. Walnut Street  
Clearfield, PA 16830

5 A. Johanna Freeman  
c/o Deborah A. Freeman  
206 W. Fifth Ave.  
Clearfield, PA 16830

6 A. Johanna Freeman  
c/o Janet Freeman  
820 Turnpike Ave.  
Clearfield, PA 16830

7 A. Johanna Freeman  
c/o Joe Freeman  
111 Turnpike Ave.  
Clearfield, PA 16830

8 A. Johanna Freeman  
c/o John D. Freeman  
4 N. Second St.  
Clearfield, PA 16830

9 A. Johanna Freeman  
c/o Joseph A. Freeman  
610 Williams St.  
Clearfield, PA 16830

10 A. Johanna Freeman  
c/o Richard C. Freeman  
308 W. Fifth Ave.  
Clearfield, PA 16830

Total number of Pieces Listed by Sender 10 Total Number of Pieces Received at Post Office

Postmaster (Name of Receiving Employee)

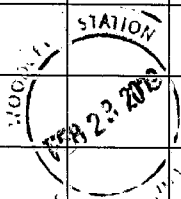
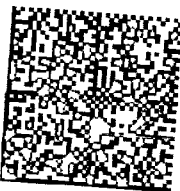
016H26519216

\$05.40

02/23/2009

Mailed From 08003  
US POSTAGE

Haster



EXHIBIT

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 R800, 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.

PS Form 3877, February 1994

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

Christopher M. Endicott  
Michelle L. Endicott, #08110039-1 (Clearfield)

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	Est. Del. Fee
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1		A. Johanna Freeman c/o Robert L. Freeman 206 W. Fifth Ave. Clearfield, PA 16830										
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2		A. Johanna Freeman c/o Sharon Freeman 520 Turnpike Ave. Clearfield, PA 16830										
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3		A. Johanna Freeman c/o Susan Freeman 610 Williams St. Clearfield, PA 16830										
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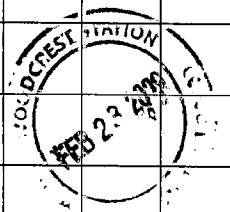
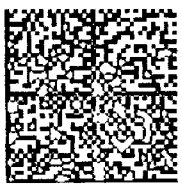
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10												
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Total number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving Employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail domestic registered mail is \$50,000. The maximum indemnity payable for the reconstruction of negotiable documents under Express Mail domestic registered mail is \$25,000. The maximum indemnity payable for registered mail, sent with optional postal insurance, 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.								
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016H26519216  
\$02.600  
02/23/2009  
Mailed From 08003  
US POSTAGE



EXHIBIT

PS Form 3877, February 1994

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

Christopher M. Endicott  
Michelle L. Endicott; #08110039-1 (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

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1  
4708 Mercantile Drive  
Ft. Worth, TX 76137  
Plaintiff

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

NO. 08-2179-CD

v.

Christopher M. Endicott  
Michelle L. Endicott  
22 Ponderosa Drive  
Penfield, PA 15849  
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: February 25, 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

HSBC bank USA, National Association, as trustee, et. al., Plaintiff(s)  
vs.  
Christopher M. Endicott, 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 #: 094984-0001

### AFFIDAVIT OF SERVICE -- Individual

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

Service of Process on:

--Christopher M. Endicott  
Court Case No. 08-2179-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, she was of legal age and was not a party to this action.

Date/Time of Service: that on the 24<sup>th</sup> day of FEBRUARY, 20 09, at 12:50 o'clock PM

Place of Service: at 22 Ponderosa Drive in Pennfield, PA 15849

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:  
Christopher M. Endicott

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  
Christopher M. Endicott  
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 M; Skin Color Cauc; Hair Color Brown; Facial Hair Beard  
Approx. Age 35; Approx. Height 6'0"; Approx. Weight 400 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

24<sup>th</sup> day of February, 20 09

Marilyn A. Campbell  
Notary Public (Commission Expires)  
12-6-11

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Marilyn A. Campbell, Notary Public  
City Of Altoona, Blair County  
My Commission Expires Dec. 6, 2011  
Member, Pennsylvania Association of Notaries

# EXHIBIT B

HISBC bank USA, National Association, as trustee, et. al., Plaintiff(s)  
vs.  
Christopher M. Endicott, 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 #: 094984 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 L. Endicott  
Court Case No. 08-2179-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 24<sup>th</sup> day of FEBRUARY, 20 09, at 12:50 o'clock P.M.

Place of Service: at 22 Ponderosa Drive, in Penfield, PA 15849

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 L. Endicott

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 L. Endicott  
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 Brown; Facial Hair N/A  
Approx. Age 35 yrs; Approx. Height 5'8"; Approx. Weight 350 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

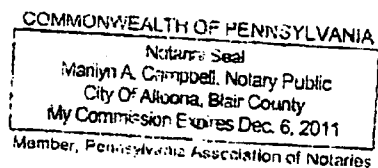
APS International, Ltd.

Subscribed and sworn to before me this

24<sup>th</sup> day of February, 20 09

Manilyn A. Campbell  
Notary Public (Commission Expires)

12-6-11



# EXHIBIT B

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20904

NO: 08-2179-CD

PLAINTIFF: HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR ACE 2006-NC1  
vs.

DEFENDANT: CHRISTOPHER M. ENDICOTT AND MICHELLE L. ENDICOTT

Execution REAL ESTATE

SHERIFF RETURN

DATE RECEIVED WRIT: 1/5/2009

LEVY TAKEN 1/20/2009 @ 1:45 PM

POSTED 1/20/2009 @ 1:45 PM

SALE HELD 7/10/2009

SOLD TO HSBC BANK USA, N. A., AS TRUSTEE FOR ACE 20006-NC1

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 8/31/2009

DATE DEED FILED 8/31/2009

PROPERTY ADDRESS 315 PENNSYLVANIA AVENUE CLEARFIELD , PA 16830

5 FILED  
0124180Y  
AUG 31 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

SERVICES

2/9/2009 @ 11:25 AM SERVED CHRISTOPHER M. ENDICOTT

SERVED CHRISTOPHER M. ENDICOTT, DEFENDANT, AT HIS RESIDENCE 22 PONDEROSA DRIVE, PENFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO CHRISTOPHER ENDICOTT

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.

2/9/2009 @ 11:25 AM SERVED MICHELLE L. ENDICOTT

SERVED MICHELLE L. ENDICOTT, DEFENDANT, AT HER RESIDENCE 22 PONDEROSA DRIVE, PENFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO MICHELLE L. ENDICOTT

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, MARCH 25, 2009 RECEIVED A FAX LETTER FROM THE PLAINTIFF'S ATTORNEY TO POSTPONE THE SHERIFF SALE SCHEDULED FOR APRIL 3, 2009 TO JUNE 5, 2009.

@ SERVED

NOW, APRIL 28, 2009 RECEIVED A FAX LETTER TO POSTPONE THE SHERIFF SALE SCHEDULED FOR JUNE 5, 2009 TO JULY 10, 2009.



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20904  
NO: 08-2179-CD

PLAINTIFF: HSBC BANK USA, NATIONAL ASSOCIATION, AS TRUSTEE FOR ACE 2006-NC1  
vs.  
DEFENDANT: CHRISTOPHER M. ENDICOTT AND MICHELLE L. ENDICOTT

Execution REAL ESTATE

SHERIFF RETURN

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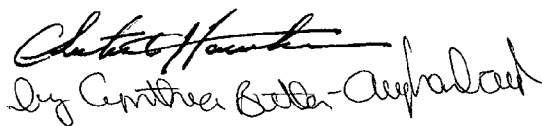
SHERIFF HAWKINS \$272.20

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.

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

HSBC Bank USA, National  
Association, as Trustee for  
ACE 2006-NC1

Plaintiff

v.

Christopher M. Endicott  
Michelle L. Endicott  
Defendant(s)

COURT OF COMMON PLEAS  
CIVIL DIVISION  
Clearfield County

MORTGAGE FORECLOSURE

NO. 08-2179-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:

315 Pennsylvania Avenue  
Clearfield, PA 16830  
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$64,195.15

Interest From 11/4/09  
to Date of Sale \_\_\_\_\_  
Ongoing Per Diem of \$14.44  
to actual date of sale including if sale is  
held at a later date

(Costs to be added)

\$ \_\_\_\_\_  
Prothonotary costs 135.00  
Prothonotary

By [Signature]

Clerk

Date 1/5/09

Received this writ this 5th day  
of January A.D. 2009  
At 2:30 A.M./P.M.

[Signature]  
Sheriff [Signature]

COURT OF COMMON PLEAS  
NO. 08-2179-CD

=====

HSBC Bank USA, National Association, as Trustee for ACE 2006-NC1  
vs.  
Christopher M. Endicott  
Michelle L. Endicott

=====

WRIT OF EXECUTION

=====

REAL DEBT \$ 64,195.15

INTEREST \$ \_\_\_\_\_

from 11/4/09

to Date of Sale \_\_\_\_\_

Ongoing Per Diem of \$14.44

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

COSTS PAID:

PROTHY \$ 135.00

SHERIFF \$ \_\_\_\_\_

STATUTORY \$ \_\_\_\_\_

COSTS DUE PROTHY. \$ \_\_\_\_\_

PREMISES TO BE SOLD:

315 Pennsylvania Avenue  
Clearfield, PA 16830

  
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 lot or ground, together with the improvements thereon, situate in the Borough of Clearfield, County of Clearfield and State of Pennsylvania, and known in the Home Builders' plan of lots in said Borough as Lot No. 24, being bounded and described as follows:

On the north by Pennsylvania Avenue; on the East by Lot No. 25; on the south by a twelve foot public alley; on the west by lot No. 23; being fifty feet front on Pennsylvania Avenue and extending in depth one hundred feet to an alley.

BEING designated as Map # 4.2-K08-224-4 in the records of the Deed Registry Office of Clearfield County, Pennsylvania.

BEING the same premises conveyed to John D. Freeman and A. Johanna Freeman, as tenants by the entireties, from Frank C. Buck, Jr. and Marjorie J. Buck, his wife, by deed dated February 6, 1948 and recorded February 6, 1948, in the Clearfield County Recorder of Deeds Office in Deed Book Volume 388, page 593. John D. Freeman died on January 13, 1986 thereby vesting all interest to his wife, A. Johanna Freeman.

BEING KNOWN AS: 315 Pennsylvania Avenue, Clearfield, PA 16830

PROPERTY ID NO.: 4-2-6-8-224-4

TITLE TO SAID PREMISES IS VESTED IN CHRISTOPHER M. ENDICOTT AND MICHELLE L. ENDICOTT HUSBAND AND WIFE BY DEED FROM A. JOHANNA FREEMAN, UNREMARIED WIDOW DATED 9/30/2005 RECORDED 10/05/2005 INSTRUMENT NO. 200516753.

# **REAL ESTATE SALE SCHEDULE OF DISTRIBUTION**

NAME CHRISTOPHER M. ENDICOTT

NO. 08-2179-CD

NOW, August 31, 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 July 10, 2009, I exposed the within described real estate of Christopher M. Endicott And Michelle L. Endicott to public venue or outcry at which time and place I sold the same to HSBC BANK USA, N. A., AS TRUSTEE FOR ACE 20006-NC1 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	17.60
LEVY	15.00
MILEAGE	2.00
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	7.62
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	9.00
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	40.00
MISCELLANEOUS	

<b>TOTAL SHERIFF COSTS</b>	<b>\$272.22</b>
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**DEED COSTS:**

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	29.00
TRANSFER TAX 2%	0.00
<b>TOTAL DEED COSTS</b>	<b>\$29.00</b>

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	64,195.15
INTEREST @ 14.4400 %	3,581.12
FROM 11/04/2008 TO 07/10/2009	

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

<b>TOTAL DEBT AND INTEREST</b>	<b>\$67,816.27</b>
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**COSTS:**

ADVERTISING	421.75
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	29.00
SHERIFF COSTS	272.22
LEGAL JOURNAL COSTS	216.00
PROTHONOTARY	135.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	363.58

<b>TOTAL COSTS</b>	<b>\$1,582.55</b>
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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

**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  
215-568-9300

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**

PLEASE RESPOND TO NEW JERSEY OFFICE

April 28, 2009

Sent via telefax #814-765-5915

Clearfield County Sheriff's Office  
Courthouse  
1 North Second Street  
Suite 116  
Clearfield, PA 16830  
ATTN: Cindy

Re: HSBC Bank USA, National Association, as Trustee for ACE 2006-  
NC1  
vs.  
Christopher M. Endicott & Michelle L. Endicott  
Clearfield County C.C.P. No. 08-2179-CD  
Premises: 315 Pennsylvania Avenue, Clearfield, PA 16830  
SS Date: June 5, 2009

Dear Cindy:

Please Postpone the Sheriff's Sale scheduled for June 5, 2009  
(postponed from April 3, 2009) to July 10, 2009.

Sale is Postponed for the following reason:

Plaintiff's Moratorium...

Thank you for your attention to this matter.

Sincerely yours,

Chris Stears  
Foreclosure Manager

/jjh