

08-2221-CD

Federal Home Loan vs Kevin Jordan

**PHELAN HALLINAN & SCHMIEG, LLP.**

By: Francis S. Hallinan, Esquire

Identification No. 62595

One Penn Center Plaza

Suite 1400

Philadelphia, PA 19103

(215) 563-7000

Attorney for Plaintiff

Federal Home Loan Mortgage Corporation

Foreclosure Unit Mail Stop 61 P.O. Box 5000

Vienna, PA 22183-5000

: Court of Common Pleas

: Civil Division

v.

: Clearfield County

Kevin Jordan

or occupants

1237 Turnpike Street, Units 1 & 2

Clearfield, PA 16830

: No. 08-2221-CD

:

**CIVIL ACTION - EJECTMENT -**

**\*\*This firm is a debt collector attempting to collect a debt and any information obtained will be used for that purpose. If you have previously received a discharge in bankruptcy and this debt was not reaffirmed, this correspondence is not and should not be construed to be an attempt to collect a debt, but only enforcement of a lien against property**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within (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 and other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

**You should take this paper to your lawyer at once. If you do not have a lawyer or cannot afford one, go to or telephone the office set forth below to find out where you can get legal help.**

PHS# 190390

5  
**FILED** *Att'y pd. 95.00*  
*m/lr: 45.32*  
NOV 18 2008 *2008 Sheriff*  
*LC* *1 CC Att'y*  
William A. Shaw  
Prothonotary/Clerk of Courts

1. Plaintiff is Federal Home Loan Mortgage Corporation.
2. Defendant is Kevin Jordan or occupants.
3. Plaintiff is the record owner of premises located at 1237 Turnpike Street, Units 1 & 2 Clearfield, PA 16830, a legal description of which is attached.
4. Plaintiff became the owner of said premises as a result of the foreclosure and judicial sale by the Sheriff of Clearfield County, on October 3, 2008, as evidenced by the Sheriff's deed recorded October 15, 2008 in the Office of the Recorder of Clearfield County in instrument# 200816578.
5. Plaintiff, by virtue of the above, is the record owner of said premises, and is entitled to possession thereof. The defendant is occupying the said premises without right and so far as the plaintiff is informed, without claim of title.
6. Plaintiff has demanded possession of the said premises from the said defendant who has refused to deliver up possession of same.

WHEREFORE, plaintiff seeks to recover possession of said premises.

  
Francis S. Hallinan, Esquire  
Attorney for Plaintiff

### LEGAL DESCRIPTION

ALL that certain parcel of land with a residential dwelling and other improvements thereon situate in the Township of Lawrence, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING at an iron pin in the Eastern line of Turnpike Avenue Extension, being the road leading from Clearfield to Penfield, designated in earlier deeds as the Clearfield to Lutchersburg Turnpike, at the Northeast corner of lot conveyed to Robert Carns by Deed dated the 11th day of October, 1943, recorded in the Deed Book 355, Page 568; thence by the Robert W. Carns line North sixty-four (64) degrees East two hundred twenty-seven and nine-tenths (227.9) feet to an iron pipe in the line of other land now or formerly of Robert W. Carns, thence by the Carns line North twenty-nine (29) degrees thirty (30) minutes West one hundred twenty-eight and two-tenths (128.2) feet to an iron pipe at a corner of Purpart Nos. 30 and 31 of the Richard Shaw Jr. Estate; thence by lot now or formerly of Mrs. R. W. (Reath) Inlow South sixty-nine (69) degrees nineteen (19) minutes West two hundred twenty-one and five-tenths (221.5) feet to a ten inch maple tree in the Eastern line of Turnpike Avenue Extension; thence by Turnpike Avenue Extension South twenty-six (26) degrees no (00) minutes East one hundred forty-eight (148) feet to an iron pipe at the corner of lot now or formerly of Robert W. Carns and the place of beginning.

Said property being in the Minor Subdivision of Land of Kevin Jordan and recorded in Clearfield County Instrument No. 199902712.

EXCEPTING and RESERVING therefrom that parcel conveyed to Edward S. & Dorothy S. Morrison by Deed dated May 12, 1999 and entered for record in the Recorder's Office of Clearfield County to Instrument No. 199908565.

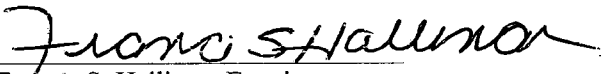
PARCEL NO. K07-249-0003:

**PROPERTY BEING: 1237 TURNPIKE AVENUE**

**VERIFICATION**

Francis S. Hallinan hereby states that he is the attorney for the Plaintiff in this eviction action and is authorized to make this verification. The statements made in the foregoing Civil Action - Ejectment are correct to the best of my knowledge, information, and belief. I was the attorney for the Plaintiff or Plaintiff's predecessor in interest in the underlying foreclosure action. I am with the law firm on the writ of execution, and my law firm or an agent of my firm purchased the property on behalf of the Plaintiff by bidding on the property at the sheriff's sale. I am making this verification rather than a representative of the Plaintiff because I have personal knowledge of the purchase of this property at sheriff's sale.

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

  
Francis S. Hallinan, Esquire  
Attorney for Plaintiff

Date November 14, 2008

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-2221-CD

FEDERAL HOME OAN MORTGAGE CORPORATION

vs

KEVIN JORDAN or OCCUPANTS

SERVICE # 1 OF 1

COMLAINT IN EJECTMENT

SERVE BY: 12/18/2008

HEARING:

PAGE: 104949

DEFENDANT:

KEVIN JORDAN or OCCUPANTS

ADDRESS:

1237 TURNPIKE ST., UNITS 1 & 2

CLEARFIELD, PA 16830

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT or OCCUPANTS

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

**SHERIFF'S RETURN**

NOW, This 2nd Day of Dec 2008 AT 1:25 AM / PM (P) SERVED THE WITHIN

COMLAINT IN EJECTMENT ON KEVIN JORDAN or OCCUPANTS, DEFENDANT

BY HANDING TO Raymond Boalick, OCCUPANT

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

ADDRESS SERVED 1237 TURNPIKE AVE

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

COMLAINT IN EJECTMENT FOR KEVIN JORDAN or OCCUPANTS

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

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

I MAKE RETURN OF **NOT FOUND** AS TO KEVIN JORDAN or OCCUPANTS

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

SWORN TO BEFORE ME THIS

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

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

George F. DeHaven  
Deputy Signature

George F. DeHaven  
Print Deputy Name

5  
**FILED**  
DEC 02 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

**PHELAN HALLINAN & SCHMIEG, LLP**

**BY: Francis S. Hallinan, Esquire**

**Identification No. 62695**

**One Penn Center @ Suburban Station Suite 1400**

**1617 John F. Kennedy Boulevard**

**Philadelphia, PA 19103-1814**

**(215) 563-7000**

**Attorney for Plaintiff**

Federal Home Loan Mortgage Corporation

: Court of Common Pleas

Plaintiff

: Civil Division

vs.

: NO. 08-2221-CD

Kevin Jordan

Or occupants

: Clearfield County

Defendants

**Praeipice to Index Rodney Boalich As Defendant**

**TO THE PROTHONOTARY:**

Pursuant to P.A.R.C.P. 410 (b)(2), kindly index Rodney Boalich as Defendant in the above captioned matter. Rodney Boalich was found in possession of the premises and was served with a copy of the Complaint on December 2, 2008.

*Francis S. Hallinan*  
Francis S. Hallinan, Esquire  
Attorney for Plaintiff

Date: January 15, 2009

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

**FILED**

*M 10:15 A.M. OK*  
**JAN 19 2009**

*S*  
William A. Shaw  
Prothonotary/Clerk of Courts

*ICC AH*  
*(610)*

**JAN 19 2009**

Attest.

*William A. Shaw*  
Prothonotary/  
Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104949  
NO: 08-2221-CD  
SERVICES 1  
COMPLAINT IN EJECTMENT

PLAINTIFF: FEDERAL HOME OAN MORTGAGE CORPORATION  
vs.  
DEFENDANT: KEVIN JORDAN or OCCUPANTS

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	PHELAN	749726	10.00
SHERIFF HAWKINS	PHELAN	749726	20.00

*S*  
**FILED**  
*012:45LM*  
**MAR 24 2009**

William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,

*Chester A. Hawkins*

Chester A. Hawkins  
Sheriff

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

COPY

NOV 18 2008

**PHELAN HALLINAN & SCHMIEG, LLP.**

By: Francis S. Hallinan, Esquire  
Identification No. 62695  
One Penn Center Plaza  
Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000

Attest.  
Attorney for Plaintiff

*William L. Shaw*  
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Foreclosure Unit Mail Stop 61 P.O. Box 5000  
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PHS# 190390

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correct copy of the  
original filed of record**

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Attorney for Plaintiff

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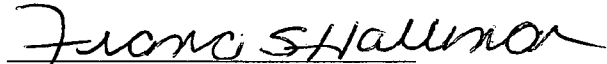
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Francis S. Hallinan, Esquire  
Attorney for Plaintiff

Date November 14, 2008

**PHELAN HALLINAN & SCHMIEG, LLP**

By: Francis S. Hallinan Esquire

Atty. I.D. No.: 62695

One Penn Center at Suburban Station

Suite 1400

Philadelphia, PA 19103-1814

(215) 563-7000

Attorney for Plaintiff

**Federal Home Loan Mortgage Corporation**

**Plaintiff**

vs.

**Court of Common Pleas**

**Clearfield County**

**No. 08-2221-CD**

**Kevin Jordan  
or occupants**

**Defendant(s)**

**FILED** 1cc + 1 Cert  
m 7:30am of discussed  
APR 13 2009 to Atty Hallinan

William A. Shaw  
Prothonotary/Clerk of Courts

**PRAECIFE TO WITHDRAW COMPLAINT, WITHOUT PREJUDICE,  
AND DISCONTINUE AND END**

TO THE PROTHONOTARY:

Kindly withdraw the complaint filed in the instant matter, without prejudice, and mark this case discontinued and ended, upon payment of your costs only.

4/4/09  
Date

Francis S. Hallinan  
Francis S. Hallinan  
Attorney for Plaintiff

PHS# 190390

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA

CIVIL DIVISION

Federal Home Loan Mortgage Corporation

Vs.

No. 2008-02221-CD

Kevin Jordan

Occupants

Rodney Boalich

CERTIFICATE OF DISCONTINUATION

Commonwealth of PA  
County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on April 13, 2009, marked:

Withdraw Complaint; without prejudice, and discontinued and ended

Record costs in the sum of \$95.00 have been paid in full by Francis S. Hallinan Esq.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 13th day of April A.D. 2009.



William A. Shaw, Prothonotary

LM