

FEDERMAN AND PHELAN

Suite 900

Two Penn Center Plaza  
Philadelphia, PA 19102-1799

215-563-7000

Fax: 215-563-5534

Rebecca Moyer  
Judgment Clerk, Ext. 283

Representing Leaders in  
Pennsylvania and New Jersey

April 13, 2000

Office of the Sheriff  
Columbia County Courthouse

Re: **Keystone Financial Bank, N.A. v. Larry G. Sweeney and Bonnie Sweeney**  
No. **99-CV-1570**

Dear Sir/Madam:

Please allow this letter to serve as a request to **stay** the Sheriff's Sale scheduled for April 20, 2000, in the above-referenced matter. We have not received consideration for this sale. Please return the Writ to the Prothonotary's Office and send our office a breakdown of costs at your earliest convenience.

Should you have any questions, please do not hesitate to contact me. Your assistance in this matter is greatly appreciated.

Very truly yours,

By:

Frank Federman  
FRANK FEDERMAN

/ram

cc: Keystone Financial Bank, N.A.  
Attention: Denise Lowrie, Foreclosure Department, Account No. 229351

(717) 391-8092

(570) 784-0257

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

Keystone Financial Bank, N.A., S/I/I

To Northern Central Bank

vs.

Larry G. Sweeney

Bonnie Sweeney, A/K/A Bonnie S.  
Sweeney

Commonwealth of Pennsylvania:

County of

TO THE SHERIFF OF COLUMBIA COUNTY, PENNSYLVANIA:

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

PREMISES: RR1, Box 144, Orangeville, PA 17859  
(See Legal Description attached)

Amount Due

\$18,562.79

Interest from 01/08/00 to Sale  
at 3.05 per diem

\$\_\_\_\_\_ and costs.

Dated

2/17/2000  
(SEAL)

IN THE COURT OF COMMON PLEAS OF  
COLUMBIA COUNTY, PENNSYLVANIA

No. 23-ED-2000 Term 19 99

No. 99-CV-1570 Term 19 99

No. \_\_\_\_\_ Term 19 99

WRIT OF EXECUTION  
(Mortgage Foreclosure)

Toni B. Filie  
(Clerk) Office of the Prothy Support, Common Pleas Court  
of Columbia County, Penna.

**Proth. & Clk. Of Sev. Courts**  
My Com. Ex. 1st Mon. Jan 2004

## DESCRIPTION

ALL THAT piece, parcel and lot of land situate in Greenwood Township, Columbia County, Pennsylvania, bounded and described as follows, to-wit:

BEGINNING at a railroad spike corner set in the center line of Township Public Route No. T-578, said point being in northerly line of lands of Gerald Woolcock; thence through said Township Route No. T-578 North 85 degrees 17 minutes 58 seconds West 8.30 feet to a corner situate on the westerly right-of-way line of said Township Route No. T-578; thence along the northerly line of the lands of Gerald Woolcock and along lands of Charles H. and Anna K. Trivelpiece South 65 degrees 43 minutes 13 seconds west 689.27 feet to an iron pin corner; thence continuing along lands of Charles B. and Anna K. Trivelpiece the following courses and distances: North 29 degrees 41 minutes 42 seconds East 697.68 feet to an iron pin; thence North 00 degrees 32 minutes 39 seconds East 458.98 feet to an iron pin; thence North 05 degrees 07 minutes 55 seconds East 199.78 feet to a railroad spike; thence North 22 degrees 38 minutes 33 seconds East 93.62 feet to a railroad spike; thence North 36 degrees 36 minutes 49 seconds East 251.72 feet to a railroad spike corner in the center line of Township Public Route No. T-599; thence along and through the center line of Township Route No. T-599 and along and through the center line of Township Route No. T-578 South 10 degrees 09 minutes 40 seconds East 319.41 feet to a railroad spike; thence continuing along and through Township Route No. 578 South 17 degrees 00 minutes 31 seconds East 364.97 feet to a railroad spike; thence continuing through and along the center line of said Township Route T-578 South 07 degrees 34 minutes 07 seconds West 611.63 feet to a railroad spike corner in the center line of Township Route No. 578 in the northerly line of the lands of Gerald Woolcock and being the point and place of BEGINNING. CONTAINING 10.280 acres of land. The aforesaid description prepared in accordance with draft of survey of McCoy's surveying, dated September 28, 1985.

Premises being: RR1. Box 144, Orangeville, PA 17859

**FEDERMAN AND PHELAN**  
**By: Frank Federman, Esquire**  
**Attorney I.D. No.: 12248**  
**Two Penn Center Plaza, Suite 900**  
**Philadelphia, PA 19102**  
**(215) 563-7000**

**Attorney for Plaintiff**

**Keystone Financial Bank, N.A., S/I/I To**  
**Northern Central Bank**  
**2270 Erin Court**  
**Lancaster, PA 17601**

**Plaintiff,**

**v.**

**Larry G. Sweeney**  
**Bonnie Sweeney, A/K/A Bonnie S. Sweeney**  
**RR1, Box 144**  
**Orangeville, PA 17859**

**Defendant(s).**

**:**  
**:** **COLUMBIA COUNTY**  
**:** **COURT OF COMMON PLEAS**  
**:**  
**:** **CIVIL DIVISION**  
**:**  
**:** **NO. 99-CV-1570**  
**:** *23-ED-2000*  
**:**  
**:**  
**:**  
**:**

**AFFIDAVIT PURSUANT TO RULE 3129**  
**(Affidavit No.1)**

**Keystone Financial Bank, N.A., S/I/I To Northern Central Bank**, Plaintiff in the above action, by its attorney, **FRANK FEDERMAN, ESQUIRE**, sets forth as of the date the Praecipe for the Writ of Execution was filed, the following information concerning the real property located at **RR1, Box 144, Orangeville, PA 17859**.

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

NAME	LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
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Larry G. Sweeney	RR1, Box 144 Orangeville, PA 17859
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Bonnie Sweeney, A/K/A Bonnie S. Sweeney	RR1, Box 144 Orangeville, PA 17859
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2. Name and address of Defendant(s) in the judgment:

NAME	LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
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**Same as above**

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

NAME	LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
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<b>Pennsylvania Dept. of Revenue</b>	<b>Dept. 280946 Harrisburg, PA 17128-0946</b>
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<b>Morrison, Inc.</b>	<b>C/O William R. Blunt, Esq. 109 S. Carlisle Street New Bloomfield, PA 17068</b>
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<b>United States Dept. of Justice US Attorney-Middle Dist. Of PA Attn: Mary Catherine Frye, Esq. Asst. US Attorney</b>	<b>P.O. Box 11754 Harrisburg, PA 17108</b>
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<b>USA, Internal Revenue Service Federated Investors Tower</b>	<b>Thirteenth Floor Suite 1300 1001 Liberty Ave Pittsburgh, PA 15222</b>
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4. Name and address of the last recorded holder of every mortgage of record:

NAME	LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
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None

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

NAME	LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
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None

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

NAME	LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
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None

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

NAME	LAST KNOWN ADDRESS (If address cannot be reasonably ascertained, please so indicate.)
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<b>Tenant/Occupant</b>	<b>RR1, Box 144 Orangeville, PA 17859</b>
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<b>Domestic Relations Columbia County</b>	<b>Columbia County Courthouse P.O. Box 380 Bloomsburg, PA 17815</b>
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I verify that the statements made in this Affidavit are true and correct to the best of my knowledge, information or belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. '4904 relating to unsworn falsification to authorities.

February 14, 2000  
Date

Frank Federman  
FRANK FEDERMAN, ESQUIRE  
Attorney for Plaintiff

ORIGINAL DOCUMENT IS PRINTED ON CHEMICAL REACTIVE PAPER & HAS A MICROPRINTED BORDER  
FEDERMAN & PHELAN  
ATTORNEY ESCROW/ACCOUNT  
TWO PENN CENTER PL. STE 900  
PHILADELPHIA, PA 19102

COMMERCE BANK  
PHILADELPHIA, PA 19148

3-180/360

CHECK NO  
068594

Pay NINE HUNDRED AND 00/100 DOLLARS

054 02-15-2000

DATE	AMOUNT
2/15/2000	*****900.00

Void after 90 days

To The  
Order  
Of  
Sheriff of Columbia County  
35 W Main Street  
Bloomsburg, PA 17815

*Frank Federman*

THE REVERSE SIDE OF THIS DOCUMENT INCLUDES AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

⑈068594⑈ ⑆036001808⑆36 065738 ⑈⑈

HARRY A. ROADARMEL, JR.



SHERIFF OF COLUMBIA COUNTY

COURT HOUSE - P. O. BOX 300

BLOOMSBURG, PA 17015

MARCH 8, 2000

FORM  
(717) 329-5411

TELEPHONE  
(717) 784-6300

DATE: march 8, 2000

RE: Sheriff's Sale Advertising Dates:

Keystone Finance Co.

v. Larry G. and Bonnie S. Sweeney

No. 23 of 2000 ED

No. 1570 of 1999 JD

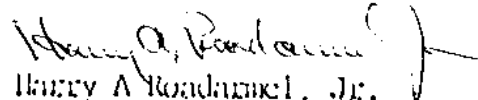
Dear Sir:

Please advertise the enclosed SHERIFF SALE on the following dates:

1st week March 30, 2000 DATE OF SALE: April 20, 2000 at 10:00 AM  
2nd week April 6, 2000  
3rd week April 13, 2000

Feel free to contact me if you have any questions.

Respectfully

  
Harry A. Roadarmel, Jr.  
Sheriff



# SHERIFF'S SALE

THURSDAY APRIL 20, 2000 AT 10:00 AM

BY VIRTUE OF A WRIT OF EXECUTION NO.23-2000 AND CIVIL WRIT NO. 1570--1999 ISSUED OUT OF THE COURT OF COMMON PLEAS OF COLUMBIA COUNTY, CIVIL DIVISION, TO ME DIRECTED, THERE WILL BE EXPOSED TO PUBLIC SALE, BY VENUE OR OUTCRY TO THE HIGHEST AND BEST BIDDER, FOR CASH, IN A COURT ROOM OR SHERIFF'S OFFICE, TO BE ANNOUNCED, AT THE COLUMBIA COUNTY COURT HOUSE, BLOOMSBURG, PENNA., 17815, ALL THE RIGHT AND TITLE AND INTEREST TO THE DEFENDANTS IN AND TO:

ALL THAT piece, parcel and lot of land situate in Greenwood Township, Columbia County, Pennsylvania, bounded and described as follows, to-wit:

BEGINNING at a railroad spike corner set in the center line of Township Public Route No. T-578, said point being in northerly line of lands of Gerald Woolcock; thence through said Township Route No. T-578 North 85 degrees 17 minutes 58 seconds West 8.30 feet to a corner situate on the westerly right-of-way line of said Township Route No. T-578; thence along the northerly line of the lands of Gerald Woolcock and along lands of Charles H. and Anna K. Trivelpiece South 65 degrees 43 minutes 13 seconds west 689.27 feet to an iron pin corner; thence continuing along lands of Charles B. and Anna K. Trivelpiece the following courses and distances: North 29 degrees 41 minutes 42 seconds East 697.68 feet to an iron pin; thence North 00 degrees 32 minutes 39 seconds East 458.98 feet to an iron pin; thence North 05 degrees 07 minutes 55 seconds East 199.78 feet to a railroad spike; thence North 22 degrees 38 minutes 33 seconds East 93.62 feet to a railroad spike; thence North 36 degrees 36 minutes 49 seconds East 251.72 feet to a railroad spike corner in the center line of Township Public Route No. T-599; thence along and through the center line of Township Route No. T-599 and along and through the center line of Township Route No. T-578 South 10 degrees 09 minutes 40 seconds East 319.41 feet to a railroad spike; thence continuing along and through Township Route No. 578 South 17 degrees 00 minutes 31 seconds East 364.97 feet to a railroad spike; thence continuing through and along the center line of said Township Route T-578 South 07 degrees 34 minutes 07 seconds West 611.63 feet to a railroad spike corner in the center line of Township Route No. 578 in the northerly line of the lands of Gerald Woolcock and being the point and place of BEGINNING. CONTAINING 10.280 acres of land. The aforesaid description prepared in accordance with draft of survey of McCoy's surveying, dated September 28, 1985.

Premises being: RR1, Box 144, Orangeville, PA 17859

## TERMS OF SALE

**Minimum Payment at Time of Sale:** The greater of ten (10%) percent of the bid price or costs (opening bid at sale). Minimum payment is to be paid in cash, certified check or cashier's check at time of sale.

**Remaining Balance of Bid Price:** Any remaining amount of the bid price is to be paid within eight (8) days after the sale in cash, certified check or cashier's check.

**IMPORTANT NOTICE FOR FAILURE TO PAY BID PRICE: FAILURE TO PAY THE BID PRICE IN ACCORDANCE WITH THESE TERMS MAY RESULT IN SERIOUS FINANCIAL CONSEQUENCES TO THE BIDDER. DO NOT BID UNLESS FUNDS ARE AVAILABLE FOR PAYMENT WITHIN THE PRESCRIBED TIME PERIOD.**

If the successful bidder fails to pay the bid price as per the above terms, the Sheriff may elect either to sue the bidder for the balance due without a resale of the property, or to resell the property at the bidder's risk and maintain an action against the bidder for breach of contract. In the case of a default all sums paid by the bidder will be considered forfeited; but will be applied against any damages recoverable. The defaulting bidder will be responsible for any attorney

fees incurred by the Sheriff in connection with any action against the bidder in which the bidder is found liable for damages.

ATTORNEY FOR PLAINTIFF

Federman & Phelan

Two Penn Center Plaza, Suite 900

Philadelphia, PA 19102

COLUMBIA COUNTY SHERIFF

Harry A. Roadarmel Jr.

HARRY A. ROADARMEL, JR.

93-2000



SHERIFF OF COLUMBIA COUNTY

COURT HOUSE - P. O. BOX 300

SHERIFF'S SHERIFF'S SALE OUTLINE

PHONE  
(717) 209-2622

24 HOUR PHONE  
(717) 204-6300

RECEIVE AND TIME STAMP WRIT

DOCKET AND INDEX

SET FILE FOLDER UP

CHECK FOR PROPER INFO

WRIT OF EXECUTION

COPY OF DESCRIPTION

WHEREABOUTS OF LAST KNOWN ADDRESS

NON-MILITARY AFFIDAVIT

NOTICES OF SHERIFF'S SALE

WATCHMAN RELEASE FORM

AFFIDAVIT OF LIENS LIST

CHECK FOR

\* IF ANY OF THE ABOVE ARE MISSING DO NOT PROCEED ANY FURTHER WITH SALE NOTIFY THE ATTY TO SEND ADDITIONAL INFO

SET SALE DATE AND ADV. DATES AND POSTING DATES

POST ALL DATES ON CALENDAR

\* SET SALE DATE AT LEAST 2 MONTHS AFTER RECEIVING WRIT

\* SET ADV. DATES 3 THURSDAYS BEFORE SALE DATE TO RUN EVERY THURSDAY TILL SALE 3 TIMES

\* SET POSTING DATE NO LATER THAN 30 DAYS PRIOR TO SALE

SET DISTRIBUTION DATE

\* MUST BE FILED WITHIN 30 DAYS OF SALE (POSTED)

\* MUST BE PAID 10 DAYS AFTER IT HAS BEEN POSTED

FILL IN ALL NO'S ON EXECUTION PAPERS

TYPE PROPER INFO ON DESCRIPTION (refer to previous sales)

SERVICE

TYPE CARDS FOR DEFENDANTS

PUT PAPERS TOGETHER FOR DEFENDANTS

\* COPY OF WRIT FOR EACH DEFENDANT

\* NOTICE OF SHERIFF SALE

\* COPY OF DESCRIPTION

PUT TOGETHER PAPERS FOR LIEN HOLDERS

\* NOTICE OF SALE DIRECTED TO THEM

SEND NOTICES TO LIEN HOLDERS VIA CERT. MAIL OR SENDERS RECEIPT