SHERIFF'S SALE

TRUCSDAY JANUARY 18, 2001 at 10:00 AM

BY VIRTUE OF A WRIT OF EXECUTION NO.257-00 ED AND CIVIL WRIT NO. 450-00 JD — 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, PERNA., 17815, ALL THE RIGHT AND TITLE AND INTEREST TO THE DEFENDANTS IN AND TO:

PREMISES A

TRACT NO. 1:

ALL THOSE CERTAIN - piece, parcels and tracts of land situate in the Town of Bioomsburg, Columbia County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a point in the northerly line of Reservoir Street at the southwesterly corner of lot No. 13, thence along lot No. 13 in a northwesterly direction to the southerly line of Ridge Alley; thence along the southerly line of Ridge Alley, a distance of 80 feet, more or less, to line of lot No. 10; thence along the line of lot No. 10 in a southerly direction to the northerly line of Reservoir Street aforesaid; thence along the northerly line of said Reservoir Street a distance of 80 feet, more or less, to the line of Lot No. 13, the place of beginning, and being Lots Numbered 11 and 12 in the plan of the Schoch and Funston Addition to the Town of Bloomsburg.

TRACT NO. 2:

ALL THOSE TWO CERTAIN pieces, parcels and tracts of land situate in the Town of Bioomsburg, Columbia County, Pennsylvania, bounded and described as follows, to wit:

BOUNDED on the north by Ridge Alley; on the east by Lot No. 15 in said Addition; on the south by Reservoir Street and on the west by Lot No. 12 in said Addition; said lots having a frontage of 40 feet each, more or less, on Reservoir Street and extending a like width to Ridge Alley aforesaid and being marked and numbered as Lots No. 13 and 14 on plot of lots of the said Schoch and Funston Addition recorded in the Recorder's Office at Bloomsburg, PA in Map Book 1, page 80, which plot by reference is made a part thereof. Upon Lot No. 13 there is erected a two and a half story frame dwelling house.

TRACT NO. 3:

ALL THOSE FOUR, adjoining lots of land situate in the Schoch and Funston Addition to the Town of Bloomsburg, County of Columbia, and State of Pennsylvania, bounded and described as follows, to wit:

BOUNDED on the north by Ridge Alley, on the East by Lot No. 11, on the south by Reservoir Street, and on the west by Lot No. 6. Having a frontage of 160 feet on Reservoir Street and being marked and designated as Lots Nos.. 7, 8, 9 and 10 in the plot of lots of the said Schoch and Funston Addition to the Town of Bloomsburg, as recorded in the Office of the Recorder of Deeds at Bloomsburg. PA in Map Book 1, page 80.

BEING KNOWN AS 83 Reservoir Street

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.

?

DATE JARUARY 23 DANIEL W SLOTTERBACK

EXACT. ESCA SON DOL DOCTS

TREASURER'S CHECK

RESMOIR AND STERNER

(C) (C) (C) (C) (C) (C)

60-593 313

20 0.1

\$ *300 977 D9*

"O"858584 "CO313054505" O538856"

Thank you for using Return Receipt Service. Consult postmaster for fee. permit. * Winte 'Return Receipt Requested" on the mailpiece below the article number. * The Return Receipt will show to whom the article was delivered and the date 2.

Restricted Delivery m Print, your reme and address on the reverse or on the back it space does not a stack title form to the front of the malipiece, or on the back it space does not a stack title form to the front of the malipiece. 1. 🙀 Addressee's Address Q0-L SE extra fee): following services (for an also wish to receive the **SENDEB:** Thank you for using Return Receipt Service. is your RETURN ADDRESS completed on the Certified Insured Domestic Return Receipt PS Form **3811**, December 1992 1. 🙀 Addressed's Address 502/18/1302 Addressee's Address (Only If requested Article Addressed to: 14 Pauli Court Paoli, PA 19301 The Return Receipt will show to whom the article was delivered and the date ENDER: 2.

Restricted Delivery Consult postmaster for fee. Signature Received By: Write "Return Receipt Requested" on the mallplece below the article number eard to you. Attach this form to the front of the mailpiece, or on the back if space does not Print your name and address on the reverse of this form so that we can return this Complete items 1 Complete items 3 Value Added Investment Coro. also, wigh to receive the services (for an 1 and/or 2 for additional services. 3, 4a, and 4b. (Print Name, extra Ind): and fee is paid) DEPARTMENT OF REVENUE-ATTN::SHERIFF SALE Les on the reverse of this form so that we can return this 02595-97-B-0179 Affach this form to the front of the mailpiece, or on the back if space does not Write Return Receipt Requested* on the malipiece below the article number.
 The Return Receipt will show to whom the article was delivered and the date. COMMONWEALTH OF PENNSYLVANIA 102595-98-B-0229 CLEARANCE SUPPORT SECTION Return Receipt for Merchandise HARRISBURG PA 17128-1230 ☐ Registered 4b. Service Type Express Mail Addressee's Address (Only if requested Date of Delivery and fee is paid) Article Number PA.DEPT OF REVENUE BUREAU OF COMPLIANCE 6. Signature: (Addressee or Agent) PS Form **3811**, December 1994 DEPARTMENT 281230 Domestic Return Receipt F. Received By: (Print Name) Consult postmaster for fee extra fee): following services (for an also wish to receive the õ Restricted Delivery Addressee's Address Certified Insured 3 7-8 ब Xont प्रदेश

PS Form 3811, December 1994 IqieoeR muteR citeemod etro-a-re-aeasor your RETURN ADDBESS completed on the reverse side? 6. Signature: (Addressee or Agent) (bisq si eet bas 5. Received By: (Print Name) 8. Addressee's Address (Only if requested 7. Date of Delivery □ cop Return Receipt for Merchandise benusni 🔲 lisM aserqx⊒ □ nier Springs Road PA 19481 Valley Forge, Deftified DenetsigeA 🔲 'STZ Clothier 4b. Service Type linomas X, Flaherty 3. Article Addressed to: 4a. Article Number

HARRY A. ROADARMEL, JR.



SHERIFF OF COLUMBIA COUNTY COURT HOUSE - P.O. BOX 380 BLOOMSBURG, PA 17815 FAX: (570) 389-5625

March 26, 2001

24 HOUR PHONE (570) 784-6300

Dilip R. Petigara, ESO. VAL INC. P.O. Box 215 Valley Forge, PA 19481 SHERIFF's Sale 4500 2000 and 257-2000

Dear Sir:

PHONE

(570) 389-5622

You have an unofficial copy of a Distribution Sheet showing the name of Sharon Babb, as the successful bidder. Also a copy of the Deed in the name of Daniel W. Slotterback. It is my recollection from the Sale that Ms. Babb and Slotterback sat side by side at the Sale and there was consultation between the two. When the property was knocked down, it was originally to Ms. Babb. On the day of the Sale there was a cash down payment. There was a conversation at that time, to have the Deed put in Slotterback's name. This was not a problem for me to do, since it was typed as yet and the final payment had not been made. On January 23, 2001, Daniel W. Slotterback came into the office, requesting the deed be made out to him and he presented a FIRST COLUMBIA Treasurer's Check No. 358539 in the amount of \$38,977.09 for the final payment. I am attaching a copy of the Treasurer's check for your viewing. Hopefully, this may answer some of your questions.

Sincerely,

Harry A. Roadarmel Jr.

Sheriff of Columbia County

ATTORNEYS AT LAW

1273 LANCASTER AVENUE BERWYN, PENNSYLVANIA 19312

> (610) 889-0700 FAX (610) 993-0498 ssugarman@suglaw.com

STEVEN L. SUGARMAN ROBERT M. MULHERN, JR. ELLIOT H. BERTON* KAREN EISNER ZUCKER ANDREW M. CALVELLI *ALSO MEMBER N.J. BAR NEW JERSEY OFFICE:
TARRAGON EXECUTIVE CENTER
811 CHURCH ROAD, SUITE 105
CHERRY HILL, NEW JERSEY 08002
(856) 486-7808

January 18, 2001

Harry A. Roadarmel, Jr., **Sheriff of Columbia County** Courthouse P.O. Box 380 Bloomsburg, PA 17815

Re: Keystone Financial Bank v. Value Added Investment Corporation

Columbia County Case No. 2000 CV 450; E.D. 257-00

Dear Sheriff Roadarmel:

It was a pleasure to meet you and your staff at the January 18, 2001 Sheriff's Sale of the real estate known as and located at 83 Reservoir Street and 248-252 Sterner Avenue, Bloomsburg, PA 17815. Based on our discussion, we understand that your office shall transmit the sum of \$2,400.00 to refund the deposit paid by our client to schedule the above-mentioned Sheriff's sale.

Based on this understanding, please be advised that Plaintiff does not intend to file a Petition to Reassess Damages and instead requests that you distribute the full amount of our client's judgment (\$29,500.00) plus interest from the date the judgment was entered (4/20/00) to the date of the Sale at the state law rate of six (6%) percent (\$1,173.53) for a total distribution of \$30,673.53.

Please be advised that our client has recently merged with another entity and is now known as Manufacturers and Traders Trust Company. If at all possible, please make your distribution check payable to this entity.

TRISTENS TIMENO L		Time of Sale
DOCKET & RETURN	\$ 7, 7, 10	X.
SERVICE PER DEFENDANT OR GARNISHEE		
LEVY (PER PARCEL)		
MAILING COSTS	9,30	
ADVERTISING, SALE BILLS & COPIES	<u> </u>	
ADVERTISING SALE (PLUS NEWSPAPER)	7,5 <i>o</i>	
MILEAGE		
POSTING HANDBILL	<u> </u>	
CRYING/ADJOURN SALE (EACH SALE)	10.	·
SHERIFF'S DEED	esser.	
TRANSFER TAX FORM	25, -	
DISTRIBUTION FORM	25	•
OTHER NOTH !	10.	
TOTAL *****	\$ 1	***\$ <u> </u>
PRESS-ENTERPRISE INC	\$ 335,47	
SOLICITOR'S SERVICES		
TOTAL *****	*********	****\$ 410,6°
PROTHONOTARY (NOTARY)	\$ 17 -	<u> </u>
RECORDER OF DEEDS	フラ く :	
OTHER		
	*********	*** *
REAL ESTATE TAXES:		<u> </u>
BOROUGH, TWP & COUNTY TAXES 20	\$ 367,40	
SCHOOL DISTRICT TAXES 2000	but a public	
DELINQUENT TAXES 20	116572	
	****	** 2202,24
MUNICIPAL FEES DUE:		
SEWER- MUNICIPAL 20	\$	
WATER- MUNICIPAL 20	1	
	********	***\$
SURCHARGE FEE: STATE TREASURER (TRAINING		
	*******	***\$ Sc
MISCELLANEOUS	\$	-
	\$	
TOTAL*****	********	***\$

Mr. Harry A. Roadarmel, Jr. **Sheriff of Columbia County** January 18, 2001 Page 2

Please notify us when the bidder pays the balance due and kindly transmit a copy of the proposed distribution to us via facsimile transmission. Thank you for your courtesy and assistance throughout this matter and please do not hesitate to contact us if you have any questions or comments with respect to the above.

Very truly yours,

STEVEN L. SUGARMAN & ASSOCIATES

Elliot H. Berton

EHB/dsg

Via Facsimile & First-Class Mail

SHERIFF'S SALE

Distribution Sheet

Kenszenk Envanoras VS. DALUER	Added
NO 1/60-7000 m	
NO. <u>757-2000</u> ED DATE OF SALE: _	DAY. 18,2001
I HEREBY CERTIFY AND RETURN, That in obedience to and by virtue of the and took into execution the within described real estate, and after having given due and place of sale, by advertisements in divers public newspapers and by handbill my bailiwick, I did on (date)	ue legal and timely notice of the time Is set up in the most public places in OOPPO , of said day ses to sale at public vendue or outcry, Dollars. being the which I have applied as follows:
Total Needed to Purchase	
Amount Paid Down	" "-
Balance Needed to Purchase EXPENSES:	<u>38,997.04</u>
Columbia County Sheriff - Costs \$ \(\frac{\pi_{\text{57.70}}}{790.} \) Poundage \(\frac{790.}{790.} \) Printing \(\frac{1}{2} \) Solicitor	···
Solicitor	
Columbia County Prothonotary Columbia County Recorder of Deeds - Deed copy work Realty transfer taxes State stamps Tax Collector (58,- 7457,09
Columbia County Tax Assessment Office. State Treasurer Other:	174,65
TOTAL EXPENSES:	\$ 9,508,94
Total Needed to Purchase Less Expenses Net to First Lien Holder Plus Deposit	\$ 42,947.69 9,508.96 30,673.53 2,400.
Sheriff's Office, Bloomsburg, Pa. So answers Total to First Lien Holder So answers Total to First Lien Holder	364,60 Sheriff

Tax Notice 2000 County & Municipality DATE BILL NO. TOWN OF BLOOMSBURG FOR: COLUMBIA COUNTY 03/01/2000 9427 MAKE CHECKS PAYBLE TO: DESCRIPTION ASSESSMENT LESS DISCOUNT TAX AMOUNT DUE MILLS INCLIPENALTY Mary F Ward GENERAL 22674 4.096 91.01 92.87 102.16 SINKING .845 301 E Second St 18.78 19.16 21.08 FIRE/LIBRARY .596 13.24 Town Hall 13.51 14.86 STREET LIGHT .882 19.60 HOURS: WEEKDAYS: 9AM - NOON & 1PM - 4:30PM 20.00 22.00 DEBT SERVICE 1.389 CLOSED WEDNESDAYS AT NOON 30.86 31.49 34.64 TOWN RE 4.251 94.46 OPEN LUNCH HOUR DURING DISCOUNT. 96.39 106.03 The discount & penalty PHONE:570-784-1581 267.95 273.42 300.77 PAY THIS AMOUNT have been calculated April 30 for your convenience June 30 June 30 f paid on or before If paid on or before If paid after TAXES ARE DUE & PAYABLE - PROMPT PAYMENT IS REQUESTED CNTY TWP This tax returned to Discount 2 % 2 % courthouse on: VALUE ADDED INVESTMENT CORP. Penalty 10 % 10 % January 1, 2001 1770 EAST LANCASTER AVE STE 15 PARCEL: 05E-05 -043-00,000 PAOLI PA 19301 1561 1.21 Acres Land 12,710 Buildings 9.964 If you desire a receipt, send a self-addressed stamped envelope with your payment **Total Assessed** 22,674 THIS TAX NOTICE MUST BE RETURNED WITH YOUR PAYMENT. TAX NOTICE 2000 SCHOOL REAL ESTATE FOR BLOOMSBURG SCHOOL DISTRICT DATE 07/01/2000 BILL# 002788 TOWN OF BLOOMSBURG DESCRIPTION ASSESSMENT MILLS LESS DISC AMOUNT FACE INC PENALTY MAKE CHECKS PAYABLE TO: REAL ESTATE 22674.GO 26.700 593.29 605.40 665.94 MARY F. WARD Town Hall 301 E. Main Street Blocmsburg, PA 17815 HOURS CLOSED WEDNESDAY AT NOON The 2% discount and 10% penalty have been 593.29 WEEKDAYS 9AM-12 & 1PM-4:30 605.40 computed for your convenience. Taxes are due 665.94 PAY now and payable. Prompt payment is requested. OPEN LUNCH HOUR DURING DISCT AUG 31 THIS OCT 31 OCT 31 This tax notice must be returned with IF PAID ON PHONE 570-784-1581 IF PAID ON IF PAID your payment. For a receipt, enclose a SASE. **AMOUNT** OR BEFORE OR BEFORE AFTER М SCHOOL PENALTY AT 10% VALUE ADDED INVESTMENT CORP Α I

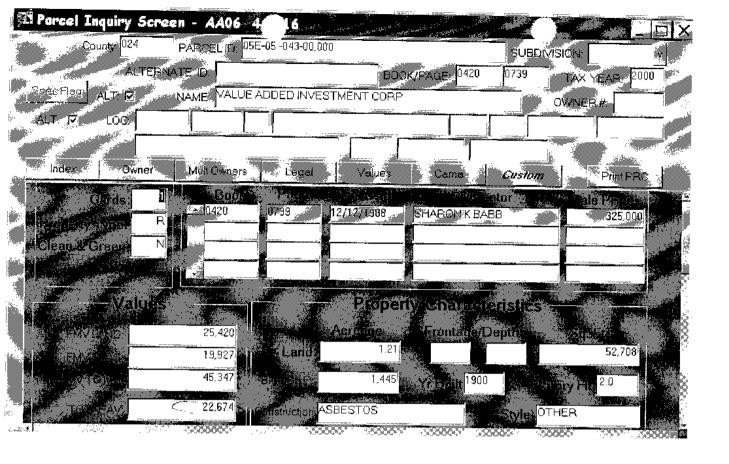
1770 EAST LANCASTER AVE STE 15 PAOLI PA 19301

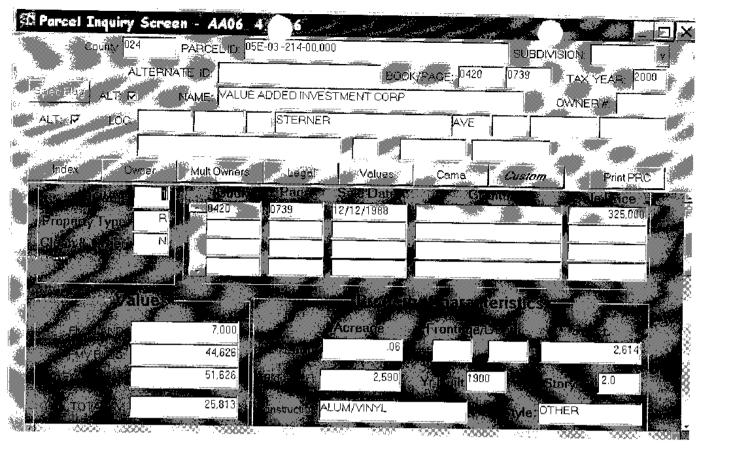
O

PROPERTY DESCRIPTION ACCT. 14433 PARCEL 05E05 04300000 THIS TAK RETURNED BUILDING 12710.00 TO COURT HOUSE 0420-0739 9964.00 JANUARY 1, 2001 1.21 ACRES NAME AND ADDRESS CORRECTION REQUESTED

- - ا

Original





Tax Notice 2000 County & Municipality TOWN OF BLOOMSBURG MAKE CHECKS PAYBLE TO: Mary F Ward

301 E Second St Town Half

HOURS: WEEKDAYS: 9AM - NOON & 1PM - 4:30PM CLOSED WEDNESDAYS AT NOON OPEN LUNCH HOUR DURING DISCOUNT.

PHONE:570-784-1581

TAX NOTICE

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O

DATE BILL NO FOR: COLUMBIA COUNTY 03/01/2000 9428 DESCRIPTION ASSESSMENT MILLS LESS DISCOUNT TAX AMOUNT DUE :NOL PENALTY GENERAL 25813 4.096 103.62 105.73 116,30 SINKING .845 21.37 21.81 23.99 FIRE/LIBRARY .596 15.07 15.38 16.92 STREET LIGHT .882 22.31 22.77 25.05 DEBT SERVICE 1.389 35.13 35.85 39.44 TOWN RE 4.251 107.54 109.73 120.70 The discount & penalty 305.04 311.27 342.40 have been calculated PAY THIS AMOUNT April 30 for your convenience June 30 June 30. If paid on or before If paid on or before If paid after

TAXES ARE DUE & PAYABLE - PROMPT PAYMENT IS REQUESTED

VALUE ADDED INVESTMENT CORP 1770 E LANCASTER AVE STE 15 PAOLI PA 19301 1561

If you desire a receipt, send a self-addressed stamped envelope with your payment THIS TAX NOTICE MUST BE RETURNED WITH YOUR PAYMENT

CNTY TWP Discount 2 % 2 % Penalty 10 % 10 % PARCEL: 05E-03 -214-00,000 STERNER AVE .06 Acres Land 3,500 Buildings 22,313 Total Assessed

25.813

This tax returned to

IF PAID

AFTER

OR BEFORE

courthouse on:

January 1, 2001

2000 SCHOOL REAL ESTATE FOR BLOOMSBURG SCHOOL DISTRICT DATE 07/01/2000 TOWN OF BLOOMSBURG BILL# 002789! DESCRIPTION ASSESSMENT MILLS MAKE CHECKS PAYABLE TO: LESS DISC AMOUNT FACE INC PENALTY REAL ESTATE 25813.00 26.700 675.43 MARY F. WARD 689.21 758.03 Town Hall 301 E. Main Street Bloomsburg, PA 17815 HOURS CLOSED WEDNESDAY AT NOON The Z% discount and 10% penalty have been WEEKDAYS 9AM-12 & 1PM-4:30 675.43 computed for your convenience. Taxes are due 689.21 758,13 PAY now and payable. Prompt payment is requested. OPEN LUNCH HOUR DURING DISCT THIS AUG 31 OCT 31 This tax notice must be returned with OCT 31 **PHONE** 570-784-1581 IF PAID ON IF PAID ON

your payment. For a receipt, enclose a SASE.

A VALUE ADDED INVESTMENT CORP I 1770 E LANCASTER AVE STE 15 L PAOLI PA 19301

SCHOOL PENALTY AT 10% PROPERTY DESCRIPTION ACCT. 16010 PARCEL 05E03 21400000 STERNER AVE THIS TAX RETURNED 3500.00 TO COURT HOUSE 0420-0739 22313.00 0.06 ACRES JANUARY I, 2001

OR BEFORE

AMOUNT

Original

NAME AND ADDRESS CORRECTION REQUESTED.

MUNICIPAL AUTHORITY

Board of Directors

Chairman
Robert Linn
Vice Chairman
George Hemingway
Treasurer
Samuel Evans
Secretary-Asst Treasurer
Gerald E. Depo
Solicitor
Charles B. Pursel, Esq.

TOWN HALL
301 EAST MAIN STREET
BLOOMSBURG, PA 17815
(570)-784-5422
FAX (570)-784-1518
E-MAIL townhall@bafn.org

Robert Linn George Hemingway Samuel Evans Donald Pursel Michael Upton

December 5, 2000

Harry A. Roadarmel Jr. Sheriff of Columbia County Columbia County Court House P. O. Box 380 Bloomsburg PA 17815

RE: Value Added Investment Corp. and Thomas X. Flaherty

83 Reservoir Street

Dear Sheriff Roadarmel:

In response to your notification regarding the pending Sheriff's Sale on the referenced property, the Bloomsburg Municipal Authority would like to inform you of a lien it holds against this property for unpaid sewer charges totaling \$174.65.

Thank you for informing the Municipal Authority office of this matter. If you require any further information, please contact me at 784-5422, ext. 112.

Sincerely,

Amber Kenney, Office Administrator

PREMISES B

ALL THAT CERTAIN piece, parcel and tract of land situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a corner in line of land of Barton Beagle; thence by said line, north 28 degrees 45 minutes west 72 feet 6 inches to a corner upon the southern line of Sterner Avenue; thence by the southern line of said Avenue, south 60 degrees 15 minutes west 35 feet 9 inches to a corner of lot late of Anna E. Kahler, now Crawford; thence by the same, south 28 degrees 45 minutes east 68 feet 3 inches to a corner; thence by other lands late of George W. Wampole, now Pealer, north 68 degrees 30 minutes east 36 feet to a corner, the place of beginning. UPON which is erected a double frame dwelling house.

BEING KNOWN AS 248-252 Sterner Avenue.

ATTORNEY FOR PLAINTIFF
Steven L. Sugarman & Associates
1273 Lancaster Ave.
Berwyn, PA 19312

SHERIFF OF COLUMBIA COUNTY Harry A. Roadarmel, Jr.

PREMISES A

TRACT NO. 1:

ALL THOSE CERTAIN - piece, parcels and tracts of land situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a point in the northerly line of Reservoir Street at the southwesterly corner of lot No. 13, thence along lot No. 13 in a northwesterly direction to the southerly line of Ridge Alley; thence along the southerly line of Ridge Alley, a distance of 80 feet, more or less, to line of lot No. 10; thence along the line of lot No. 10 in a southerly direction to the northerly line of Reservoir Street aforesaid; thence along the northerly line of said Reservoir Street a distance of 80 feet, more or less, to the line of Lot No. 13, the place of beginning, and being Lots Numbered 11 and 12 in the plan of the Schoch and Funston Addition to the Town of Bloomsburg.

TRACT NO. 2:

ALL THOSE TWO CERTAIN pieces, parcels and tracts of land situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to wit:

BOUNDED on the north by Ridge Alley; on the east by Lot No. 15 in said Addition; on the south by Reservoir Street and on the west by Lot No. 12 in said Addition; said lots having a frontage of 40 feet each, more or less, on Reservoir Street and extending a like width to Ridge Alley aforesaid and being marked and numbered as Lots No. 13 and 14 on plot of lots of the said Schoch and Funston Addition recorded in the Recorder's Office at Bloomsburg, PA in Map Book 1, page 80, which plot by reference is made a part thereof. Upon Lot No. 13 there is erected a two and a half story frame dwelling house.

TRACT NO. 3:

ALL THOSE FOUR, adjoining lots of land situate in the Schoch and Funston Addition to the Town of Bloomsburg, County of Columbia, and State of Pennsylvania, bounded and described as follows, to wit:

BOUNDED on the north by Ridge Alley, on the East by Lot No. 11, on the south by Reservoir Street, and on the west by Lot No. 6. Having a frontage of 160 feet on Reservoir Street and being marked and designated as Lots Nos.. 7, 8, 9 and 10 in the plot of lots of the said Schoch and Funston Addition to the Town of Bloomsburg, as recorded in the Office of the Recorder of Deeds at Bloomsburg, PA in Map Book 1, page 80.

BEING KNOWN AS 83 Reservoir Street

PREMISES B

ALL THAT CERTAIN piece, parcel and tract of land situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a corner in line of land of Barton Beagle; thence by said line, north 28 degrees 45 minutes west 72 feet 6 inches to a corner upon the southern line of Sterner Avenue; thence by the southern line of said Avenue, south 60 degrees 15 minutes west 35 feet 9 inches to a corner of lot late of Anna E. Kahler, now Crawford; thence by the same, south 28 degrees 45 minutes east 68 feet 3 inches to a corner; thence by other lands late of George W. Wampole, now Pealer, north 68 degrees 30 minutes east 36 feet to a corner, the place of beginning. UPON which is erected a double frame dwelling house.

BEING KNOWN AS 248-252 Sterner Avenue.

BY: Steven L. Sugarman, Esquire IDENTIFICATION NO. 32473 1273 LANCASTER AVENUE BERWYN, PA 19312-2607 (610) 889-0700

ATTORNEY FOR Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania Bank and Trust Company

KEYSTONE FINANCIAL BANK, N.A., successor-in-interest to

PENNSYLVANIA BANK AND TRUST COMPANY

601 Dresher Road Horsham, PA 19044

٧.

FAX: (610) 993-0498

VALUE ADDED INVESTMENT CORP.

14 Paoli Court Paoli, PA 19301-4185 and THOMAS X. FLAHERTY

P.O. Box 215 Clothier Springs Road Valley Forge, PA 19481 Columbia County
Court of Common Pleas
Civil Division

No. 2000-CV-450

AFFIDAVIT OF NON-MILITARY SERVICE

Elliot H. Berton, Esquire, counsel for the Plaintiff, deposes and states that to the best of his knowledge, information and belief, the Defendant in the above captioned matter is not in the Military Service of the United States of America, as defined by the Soldiers and Sailors Relief Act of 1940, its supplements or amendments.

Your affiant verifies that the statements made in this Affidavit are true and correct and understands that false statements made herein are subject to the penalties of 18 Pa.C.S.A. §4904, relating to unsworn falsification to authorities.

6)24) 0c)

Date

Elliot H. Berton, Esquire

BY: Steven L. Sugarman, Esquire IDENTIFICATION NO. 32473 1273 LANCASTER AVENUE BERWYN, PA 19312-2607 (610) 689-0700 FAX: (610) 993-0498

ATTORNEY FOR Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania Bank and Trust Company

KEYSTONE FINANCIAL BANK, N.A., successor-in-interest to PENNSYLVANIA BANK AND TRUST COMPANY

601 Dresher Road Horsham, PA 19044

V.

VALUE ADDED INVESTMENT CORP.

14 Paoli Court Paoli, PA 19301-4185 and THOMAS X. FLAHERTY

P.O. Box 215 Clothier Springs Road Valley Forge, PA 19481 Columbia County
Court of Common Pleas
Civil Division

No. 2000-CV-450

WAIVER OF WATCHMAN

Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania National Bank and Trust Company, Plaintiff in the above-captioned action, hereby waives any requirement for a watchman in connection with the levy upon the real estate known as and located at 83 Reservoir Street, Bloomsburg, Pennsylvania, or 248-252 Sterner Avenue, Bloomsburg, Pennsylvania.

STEVEN L. SUGARMAN & ASSOCIATES

By:

Steven L. Sugarman, Esquire Elliot H. Berton, Esquire Attorneys for Plaintiff

BY: Steven L. Sugarman, Esquire IDENTIFICATION NO. 32473 1273 LANCASTER AVENUE BERWYN, PA 19312-2607 (610) 889-0700 FAX: (610) 993-0498

ATTORNEY FOR Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania Bank and Trust Company

KEYSTONE FINANCIAL BANK, N.A., successor-in-interest to PENNSYLVANIA BANK AND

601 Dresher Road Horsham, PA 19044

TRUST COMPANY

٧.

VALUE ADDED INVESTMENT CORP.

14 Paoli Court Paoli, PA 19301-4185 and THOMAS X. FLAHERTY

P.O. Box 215 Clothier Springs Road Valley Forge, PA 19481 Columbia County
Court of Common Pleas
Civil Division

No. 2000-CV-450

CERTIFICATION PURSUANT TO ACT 91

I, Elliot H. Berton, Esquire, counsel for the Plaintiff in the above-captioned matter, hereby certify that the Defendants are not entitled to relief under the Homeowners Emergency Assistance Act, Act 1983, December 23, P.L. 385, NL. 91, Subsection 2, 35 P.S. Subsection 1680.401C, as the properties subject to the Writ are commercial real estate and not the principal residence of any Defendant.

STEVEN L. SUGARMAN & ASSOCIATES

By:_

Steven L. Sugarman, Esquire Elliot H. Berton, Esquire Attorneys for Plaintiff

ATTORNEYS AT LAW

1273 LANCASTER AVENUE BERWYN, PENNSYLVANIA 19312

> (610) 889-0700 FAX (610) 993-0498

STEVEN L SIIGARMAN ROBERT M. MULHERN, JR. ELLIOT H. BERTON* KAREN EISNER ZUCKER ANDREW M. CALVELIJ

October 23, 2000

NEW JERSEY OFFICE: TARRAGON EXECUTIVE CENTER 811 CHURCH ROAD, SUITE 105 CHERRY HILL, NEW JERSEY 08002 (856) 486-7808

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

TO: All Parties in Interest and Claimants

OWNER(S): Value Added Investment Corporation

Columbia County

Case No. 2000-CV-450

PROPERTY: 83 Reservoir Street, Bloomsburg, PA 17815

(Premises A)

248-252 Sterner Avenue, Bloomsburg, PA 17815

(Premises B)

Improvements: Multi Unit

Rental Dwelling

Improvements: Double Frame

Rental Dwelling

The above captioned property is scheduled to be sold at the County Sheriff's Sale on Thursday, at a.m. in the Columbia County Courthouse, Bloomsburg, Pennsylvania. 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.

Very truly yours,

STEVEN L. SUGARMAN & ASSOCIATES

Steven L. Sugarman Elliot H. Berton

SLS/EHB/mjmr

ATTORNEYS AT LAW

1273 LANCASTER AVENUE BERWYN, PENNSYLVANIA 19312

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NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

TOAll Parties in Interest and Claimants

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Columbia County Case No. 2000-CV-450

PROPERTY: 83 Reservoir Street, Bloomsburg, PA 17815

(Premises A)

248-252 Sterner Avenue, Bloomsburg, PA 17815

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October 23, 2000

NEW JERSEY OFFICE. TARRAGON EXECUTIVE CENTER 811 CHURCH ROAD, SUITE 105 CHERRY HILL, NEW JERSEY 08002 (856) 486-7808

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

All Parties in Interest and Claimants TO:

OWNER(S): Value Added Investment Corporation

Columbia County Case No. 2000-CV-450

PROPERTY: 83 Reservoir Street, Bloomsburg, PA 17815

(Premises A)

248-252 Sterner Avenue, Bloomsburg, PA 17815

(Premises B)

Improvements: Multi Unit

Rental Dwelling

Improvements: Double Frame

Rental Dwelling

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Very truly yours,

STEVEN L. SUGARMAN & ASSOCIATES

Steven L. Sugarman Elliot H. Berton

SLS/EHB/mjmr

BY: Steven L. Sugarman, Esquire IDENTIFICATION NO. 32473 1273 LANCASTER AVENUE BERWYN, PA 19312-2607

ATTORNEY FOR Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania Bank and Trust Company

(610) 889-0700 FAX: (610) 993-0498

KEYSTONE FINANCIAL BANK, N.A., successor-in-interest to PENNSYLVANIA BANK AND TRUST COMPANY

601 Dresher Road Horsham, PA 19044

V.

VALUE ADDED INVESTMENT CORP.

14 Paoli Court Paoli, PA 19301-4185 and THOMAS X. FLAHERTY

P.O. Box 215 Clothier Springs Road Valley Forge, PA 19481 Columbia County
Court of Common Pleas
Civil Division

No. 2000-CV-450

NOTICE OF EXEMPTION RIGHT

In addition to your other rights, the law provides that you are entitled to a debtor's exemption of \$300.00 per owner which will be paid to you in cash if the Sheriff's Sale is completed.

If you believe that the value of your equity in the property is less than \$300.00 per owner you may be able to prevent the sale if you do the following promptly:

- 1) Fill out the attached claim form and demand for a prompt hearing.
- Deliver the form or mail it to the Sheriff's Office at the addresses noted below.

You should come to court ready to explain your exemption. If you do not come to court and prove your exemption, and the sale is not stopped for some other reasons, the sale will be held.

COLUMBIA COUNTY SHERIFF'S OFFICE P.O. Box 380 Bloomsburg, PA 17815 (570) 389-5624

MAJOR EXEMPTIONS UNDER PENNSYLVANIA AND FEDERAL LAW

- 1. \$300 statutory exemption
- 2. Bibles, school books, sewing machines, uniforms and equipment
- Most wages and unemployment compensation
- 4. Social Security benefits
- 5. Certain retirement funds and accounts
- 6. Certain veteran and armed forces benefits
- 7. Certain insurance proceeds
- 8. Such other exemptions as may be provided by law

WRI' DF EXECUTION - (Money J. Igments) ACO-ED-257 Rules P. R. C. P. 3101 to 3149

Keystone Financial Bank, N.A., succe	ssor- No. 2000-CV-450
in interest to Pennsylvania National and Trust Company	1 Bank WRIT OF EXECUTION
	(MONEY JUDGMENTS)
VS)
Value Added Investment Corp. and Thomas X. Flaherty	(Confession of Judgment)
	_
	i
Commonwealth Of Pennsylvania, County of Columbia	·
To the sheriff of Columbia	County Pengalani
To satisfy the judgment, interest and	costs against Value Added Investment Corp. and
Thomas X. Flaherty	against verde Acced Investment Corp. and
(1) You are directed to 1	Defendant (s)
interest therein; (Inquistion and exemption law (2) You are also directed to accept the	property of the defendant (s) and to sell his, her (or their)
(2) You are also directed to attach th	e property of the defendant not levied upon in the
1XX35C331OTI OL	
(Specifically Describe Property)	as garnishee (s)
real estate known as: 83 Reservoir Street, Bloomsburg, PA 248-252 Sterner Avenue Pl	17015 / 70.
- 10 ESS SCELLET AVEURE RICOMSPINA	PA 17815 (Premises A)
(See Attached Description)	THE THOUSE (FIGHTSES B)
and to notify the garnishee (s) that	· · · · · · · · · · · · · · · · · · ·
(A) An attachment has been issued;	
(B) The garnishee (s) is (are) enjoined	I from paying any debt to or for the account of the
(a) if and from delivering any property of	I from paying any debt to or for the account of the the defendant (s) or otherwise disposing thereof.
possession of anyone other than the many t	ried upon and subject to attachment is found in the
added as a garnishee and is enjoined as above state	ee (s), you are directed to notify him that he has been
	Amount Due \$ 29,500.23
1	Interest From 4/20/00 \$ 892.27
12/12/10	Plus Costs As Per Endorsement Hereon
Dated 11 03 10	Prothonotary
(364)	Prothonotary
	Court Of Common Pleas Of Columbia County, Pennsylvania
	councy, remisyrvarila
	Per Elizabetto C. Branon Deputy
	Д

WRIT OF EXECUTION - (Money J 'gments) 2000 - ED-25' Rules P. R. C. P. 3101 to 3149

Keystone Financial Bank, N.A., successor	r- No. 2000-CV-450
in interest to Pennsylvania National Ba and Trust Company	enk WRIT OF EXECUTION
Vs	(MONEY JUDGMENTS)
Value Added Investment Corp. and Thomas X. Flaherty	(Confession of Judgment)
Commonwealth Of Pennsylvania, County of Columbia	
To the sheriff ofColumbia	County, Pennsylvania:
To satisfy the judgment, interest and costs	against Value Added Investment Corp. and
Thomas X. Flaherty	
interest therein; (Inquistion and exemption laws and	erty of the defendant (s) and to sell his, her (or their) aived and condemnation agreed to) roperty of the defendant not levicel upon in the
real estate known as: 83 Reservoir Street, Bloomsburg, PA 17 248-252 Sterner Avenue, Bloomsburg, PA (See Attached Description)	815 (Premises A) 17815 (Premises B)
and to notify the garnishee (s) that	
(A) An attachment has been issued;	
(B) The garnishee (s) is (are) enjoined frodefendant (s) and from delivering any property of the	om paying any debt to or for the account of the
(3) If property of the defendant not levied possession of anyone other than the named garnishee (sadded as a garnishee and is enjoined as above stated.	upon and subject to attachment is found in the i), you are directed to notify him that he has been
	Amount Due \$ 29,500.23
	Interest From 4/20/00 \$ 892.27
	Plus Costs As Per Endorsement Hereon
Dated	Jani B. Keine
(Seal)	Prothonotary
Co Co	lumbia County, Pennsylvania
Per	Wystet a Burner Deputy
	Deputy

BY: Steven L. Sugarman, Esquire IDENTIFICATION NO. 32473 1273 LANCASTER AVENUE BERWYN, PA 19312-2607 (610) 889-0700

FAX: (610) 993-0498

ATTORNEY FOR Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania Bank and Trust Company

KEYSTONE FINANCIAL BANK, N.A., successor-in-interest to PENNSYLVANIA BANK AND TRUST COMPANY

601 Dresher Road Horsham, PA 19044

VALUE ADDED INVESTMENT CORP.

14 Paoli Court Paoli, PA 19301-4185 and THOMAS X. FLAHERTY

P.O. Box 215 Clothier Springs Road Valley Forge, PA 19481 Columbia County
Court of Common Pleas
Civil Division

No. 2000-CV-450

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

TO: Value Added Investment Corporation and Thomas X. Flaherty

Your real estate located at 83 Reservoir Street, Bloomsburg, Pennsylvania and 248-252 Sterner Avenue, Bloomsburg, Pennsylvania, is to be sold at Sheriff's Sale on Thursday, Section 18 at 10 a.m. in the Columbia County Courthouse, Bloomsburg, Pennsylvania, 17815.

NOTICE OF OWNER'S RIGHTS YOU MAY BE ABLE TO PREVENT THIS SHERIFF'S SALE

To prevent this Sheriff's Sale you must take IMMEDIATE ACTION:

1. The sale will be canceled if you pay to Keystone Financial Bank, N.A. in c/o Steven L. Sugarman & Associates, Attorneys for Plaintiff, at 1273 Lancaster Avenue, Berwyn, Pennsylvania, 19312-2607, by certified check, money order, or other immediately payable funds, the amount of the Judgment, interest, costs and fees due. To find out how much you must pay, you may call: Steven L. Sugarman & Associates, at (610) 889-0700.

- 2. You may be able to stop the sale by filing a Petition asking the Court to strike or open the Judgment, if the Judgment was improperly entered. You may also ask the Court to postpone the sale for good cause.
 - You may also be able to stop the sale through other legal proceedings.
- 4. You may need an attorney to assert your rights. The sooner you contact one, the more chance you will have of stopping the sale. (See notice below on how to obtain an attorney).

YOU MAY STILL BE ABLE TO SAVE YOUR PROPERTY AND YOU HAVE OTHER RIGHTS EVEN IF THE SHERIFF'S SALE DOES TAKE PLACE.

- 1. If the Sheriff's Sale is not stopped, your property will be sold to the highest bidder. You may find out the price bid by calling the Columbia County Sheriff's Office at (570) 389-5624.
- 2. You may be able to Petition the Court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.
- 3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened you may call the Sheriff's Office at (570) 389-5624.
- 4. If the amount due from the buyer is not paid to the Sheriff, you will remain the owner of the property as if the sale never happened.
- 5. You have a right to remain in the property until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.
- 6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money bid for your house will be filed by the Sheriff on a date specified by the Sheriff not later than thirty (30) days after sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after the filing of the schedule.
- 7. You may also have other rights and defenses or ways of getting your house back if you act immediately after the sale.

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 LISTED BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

SUSQUEHANNA LEGAL SERVICES 168 East 5th Street Bloomsburg, PA 17815 Telephone (570) 784-8760

BY: Steven L. Sugarman, Esquire
IDENTIFICATION NO. 32473
1273 LANCASTER AVENUE
BERWYN, PA 19312-2607

ATTORNEY FOR Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania Bank and Trust Company

(610) 889-0700 FAX: (610) 993-0498

KEYSTONE FINANCIAL BANK, N.A., successor-in-interest to PENNSYLVANIA BANK AND TRUST COMPANY

601 Dresher Road Horsham, PA 19044

٧.

VALUE ADDED INVESTMENT CORP.

14 Paoli Court Paoli, PA 19301-4185 and THOMAS X. FLAHERTY

P.O. Box 215 Clothier Springs Road Valley Forge, PA 19481 Columbia County
Court of Common Pleas
Civil Division

No. 2000-CV-450

NOTICE UNDER RULE 2958.2 OF JUDGMENT AND EXECUTION THEREON

NOTICE OF DEFENDANT'S RIGHTS

TO: Value Added Investment Corp. and Thomas X. Flaherty

A judgment in the amount of \$29,500.23 has been entered against you and in favor of the plaintiff without any prior notice or hearing based on a confession of judgment contained in a written agreement or other paper allegedly signed by you. The court has issued a writ of execution which directs the sheriff to levy upon and sell certain real property owned by you to pay the judgment. The sheriff's sale has been scheduled for $\sqrt{4n}$, $\sqrt{6}$,

You may have legal rights to defeat the judgment or to prevent or delay the sheriff's sale.

I. YOU MUST FILE A PETITION SEEKING RELIEF FROM THE JUDGMENT OR DELAY OF THE SHERIFF'S SALE PRIOR TO THE SHERIFF'S SALE OR YOU MAY LOSE YOUR RIGHTS.

II. YOU MUST FILE A PETITION SEEKING RELIEF FROM THE JUDGMENT AND PRESENT IT TO A JUDGE WITHIN THIRTY (30) DAYS AFTER THE DATE ON WHICH THIS NOTICE IS SERVED ON YOU OR YOU MAY LOSE YOUR RIGHTS.

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:

SUSQUEHANNA LEGAL SERVICES 168 East 5th Street Bloomsburg, PA 17815 Telephone (570) 784-8760

OR

PENNSYLVANIA LAWYER REFERRAL SERVICE PENNSYLVANIA BAR ASSOCIATION P.O. Box 186 Harrisburg, PA 17108 (800) 692-7375

STEVEN L. SUGARMAN & ASSOCIATES

Steven L. Sugarman, Esquire

Elliot H. Berton, Esquire Attorneys for Plaintiff

ATTORNEYS AT LAW

1273 LANCASTER AVENUE BERWYN, PENNSYLVANIA 19312

> (610) 889-0700 FAX (610) 993-0498

STEVEN L. SUGARMAN ROBERT M. MULHERN, JR. ELLIOT H. BERTON* KAREN EISNER ZUCKER ANDREW M. CALVELLI

*ALSO MEMBER N.J. BAR

December 11, 2000

NEW JERSEY OFFICE:
TARRAGON EXECUTIVE CENTER
811 CHURCH ROAD, SUITE 105
CHERRY HILL, NEW JERSEY 08002
(856) 486-7808

Prothonotary Of Columbia County P.O. Box 380 Bloomsburg, Pa 17815

Re:

Keystone Financial Bank, N.A. Successor in Interest to Pennsylvania Bank and Trust Company v. Value Added Investment Corp. and Thomas X. Flaherty Columbia County Case No. 2000-CV-450

Dear Sir/Madam:

Enclosed please find an original and one (1) copy of an Affidavit of Service of the Sheriff's Sale Notices in connection with the above-referenced case. Kindly file the original and transmit the time-stamped copy of same to us in the self-addressed stamped envelope provided herewith.

Thank you for your customary courtesy and assistance.

Very truly yours,

STEVEN L. SUGARMAN & ASSOCIATES

Elliot H. Berton

EHB/dsg Enclosure

cc: Sheriff of Columbia County (w/encls.)

BY: Steven L. Sugarman, Esquire
IDENTIFICATION NO. 32473
1273 LANCASTER AVENUE
BERWYN, PA 19312-2607
(610) 889-0700

ATTORNEY FOR Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania Bank and Trust Company

KEYSTONE FINANCIAL BANK, N.A., successor-in-interest to PENNSYLVANIA BANK AND TRUST COMPANY

٧.

FAX: (610) 993-0498

VALUE ADDED INVESTMENT CORP. and THOMAS X. FLAHERTY

Columbia County Court of Common Pleas Civil Division

No. 2000-CV-450

AFFIDAVIT OF SERVICE

- I, Elliot H. Berton, being of full age, do say upon my oath as follows:
- 1. I am an associate with the law firm of Steven L. Sugarman & Associates, counsel for the Plaintiff in the above-referenced matter.
- 2. On December 7, 2000, the Notices of Sheriff's Sale required by Pa. R.C.P. No. 3129.2(c)(1), and related documents, including the Notice required by Pa. R.C.P. No. 2958.2, were served upon the Defendants and owners of the Property subject to the Writ of Execution in the above-captioned matter by certified mail in accordance with Pa. R.C.P. No. 3129.2(c), (1)(i)(B), which certified mail is accepted. True and correct copies of the correspondence enclosing the aforementioned documents and the certified mail receipts are attached hereto and incorporated herein collectively as Exhibit "A".

- 3. Pursuant to Pa. R.C.P. Nos. 3129.2(c) and 403, the Notice of Sheriff's Sale has been served upon the Defendants in the judgment and the owner of the real property subject to the Writ of Execution.
- 4. In addition, I did cause to be served upon all the persons and entities entitled to receive such notice, a Notice of Sheriff's Sale by first-class mail to the addresses set forth in the Affidavit Pursuant to Pa. R.C.P. No. 3129.1 heretofore filed in this matter. True and correct copies of the U.S. Postal Service 3817 Certificates of Mailing are attached hereto and incorporated herein collectively as Exhibit "B."

I make this Affidavit subject to the penalties of 18 Pa. C.S. §4904 regarding unsworn falsification to authorities.

Date:	December 11, 2000	
		Elliot H#Berton

ATTORNEYS AT LAW

1273 LANCASTER AVENUE BERWYN, PENNSYLVANIA 19312

> (610) 889-0700 FAX (610) 993-0498 ssugarman@suglaw.com

STEVEN L. SUGARMAN ROBERT M. MULHERN, JR. FLLIOT H. BERTON* KAREN EISNER ZUCKER ANDREW M. CALVELLI

*ALSO MEMBER N.J. BAR

December 5, 2000

NEW JERSEY OFFICE:
TARRAGON EXECUTIVE CENTER
811 CHURCH ROAD, SUITE 105
CHERRY HILL, NEW JERSEY 08002
(856) 486-7808

Value Added Investment Corp. 14 Paoli Court Paoli, PA 19301-4185

Re:

Keystone Financial Bank, N.A. Successor in Interest to Pennsylvania Bank and Trust Company v. Value Added Investment Corp. and Thomas X. Flaherty

Columbia County Case No. 2000-CV-450

Dear Sir/Madam:

Enclosed for service please find a Notice under Rule 2958.2 of Judgment and Execution thereon, a Notice of Sheriff's Sale of Real Property, Notice of Exemption Rights, Claim for Exemption form and copy of the Writ of Execution to which is appended the property descriptions in connection with the above-referenced matter. As you can see, a Sheriff's Sale of the real estate known as and located at 83 Reservoir Street and 248 and 252 Sterner Avenue, Bloomsburg, Pennsylvania have been scheduled for Sheriff's Sale on January 18, 2001 at 10:00 a.m.

Very truly yours,

STEVEN L. SUGARMAN & ASSOCIATES

Elliot H. Berton

EHB/dsg Enclosure

Via Certified Mail - Return Receipt Requested

ATTORNEYS AT LAW

1273 LANCASTER AVENUE BERWYN, PENNSYLVANIA 19312

(610) 889-0700 FAX (610) 993-0498 ssugarman@suglaw.com

STEVEN L. SUGARMAN ROBERT M. MULHERN, JR. ELLIOT H. BERTON* KAREN EISNER ZUCKER ANDREW M. CALVELLI

*ALSO MEMBER N.J. BAR

December 5, 2000

NEW JERSEY OFFICE:
TARRAGON EXECUTIVE CENTER
811 CHURCH ROAD, SUITE 105
CHERRY HILL, NEW JERSEY 08002
(856) 486-7808

Mr. Thomas X. Flaherty 14 Paoli Court Paoli, PA 19301-4185

Re:

Keystone Financial Bank, N.A. Successor in Interest to Pennsylvania Bank and Trust Company v. Value Added Investment Corp. and Thomas X. Flaherty Columbia County Case No. 2000-CV-450

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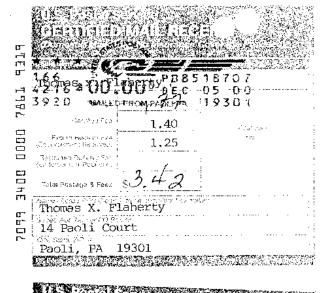
Very truly yours,

STEVEN L. SUGARMAN & ASSOCIATES

Elliot H. Berton

EHB/dsg Enclosure

Via Certified Mail - Return Receipt Requested



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		2301			HATTELEN HARTELEN	e e e e e e e e e e e e e e e e e e e

2. Arti

PS Fo

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
■ Complete items 1, 2, and 3, Also contem 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailplece, or on the front if space permits.	A. Received by (Ploase Print Clearly) B. Date of Deliver C. Signaturo X
Value Mided Investment Corp. 14 Paoli Court Paoli, PA 19301	If YES, enter delivery address below: 🕡 No
	3. Service Type *□*Certified Mail □ Express Mail □ Registered □ Receipt for Morphandis □ Insured Mail □ C.O.D.
Article Number (Copy from service label)	4. Restricted Delivery? (Extra Fee)
7099 3400 0000 7861 9340	
CONDER COMMITTEE THE COMMITTE	COMPLETE THIS SECTION ON DELIVERY
■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 1. Article Addressed to: Article Addressed to: Paul:	A. Received by (Please Print Clearly) D. Date of Delivery C. Signature X D. Is delivery address different from item 1? If YES, enter delivery address below:
PAULI PA 19321	3. Service Type ☐ Certified Moil ☐ Express Moil ☐ Registered ☐ Return Receipt for Merchandise ☐ Dissured Mail ☐ C.O.D.
	4. Restricted Delivery? (Extra Fee) [_] Yes

2595-99 M 1789

U.S. POSTAL SERVICE CERTIFICATE OF MAILING MAY BE USED FOR DOMESTIC AND INTERNATIONAL DOES NOT PROVIDE FOR INSURANCE — POSTWASTER	Affix tee here in stamps or mater postage and post mark. Inquire of Postmaster for current
Steven L. Sugarman, Associates Steven L. Sugarman & Associates 1273 Lancaster Avenue LEDIFFON PACLIFIA Berwyn, PA 19312-2607	135 4264 CON
Come place of ordinary mult addressed to: Bloomsburg Municipal Authority 301 East Second Street Bloomsburg, PA 17815	

PS Form 3817, Mar. 1989

Received From: _1273_Lancaster Avenue Berwyn, PA 19312-2607 One piece of ordinary mail addressed to: Sharon Babb 727 Market Street Bloomsburg, PA 17815

PS Form 3817, Mar. 1989

Affix fee here in stamps or nieter postage and post mark, inquire of Postmaster for current

PAREZ	KEYSTONE BANK 60-183/319	\$ **2,400.00	A ACCOUNT
6 ORIGINAL DOCUMENT IS PRINTED ON CHEMICAL REACTIVE DABED	STEVEN L. SUGARMAN & ASSOCIATES ATTORNEYS AT LAW 1273 LANCASTER AVENUE BERWYN, PENNSYLVANIA 18312	PAY TO THE Sheriff of Columbia County Two Thousand Four Hundred and 00/100*********************************	MEMO FB-Value Added (WOE)

SHERIFF'S SALE

Distribution Sheet

No. A50-2000 ID DATE OF SALE: January 18, 2001	f the tin places said da or outery Dollar being th
I HEREBY CERTIFY AND RETURN, That in obedience to and by virtue of the within writ, to me directed and took into execution the within described real estate, and after having given due legal and timely notice of and place of sale, by advertisements in divers public newspapers and by handbills set up in the most public my bailiwick, I did on (date)Jan18_2001 and (time)	f the tin places said da or outery Dollar being th
and took into execution the within described real estate, and after having given due legal and timely notice of and place of sale, by advertisements in divers public newspapers and by handbills set up in the most public may bailiwick, I did on (date)Jan18-2001 and (time)	f the tin places said da or outery Dollar being th
Sharon Babb Sharon Babba Sharon Babb Sharon Babb Sharon Babb Sharon Babba Sharon Babb Sharon Babb Sharon Babb Sharon Babba	being th
Anighest and best bidder, and that the highest and best price bidden for the same; which I have applied as fol Bid Price	being th
Bid Price \$ 39,500.00	_
Poundage 79 ∩ .00 Transfer Taxes 2,657.09 Total Needed to Purchase \$ \$42,947.09 Amount Paid Down 38,977.09 EXPENSES: Columbia County Sheriff - Costs \$ 482.70 Poundage 790.00 \$ 1,272.70 Newspaper 671,34 Printing -2 Solicitor 150.00 Columbia County Prothonotary 20.00 Columbia County Recorder of Deeds - Deed copy work Realty transfer taxes 2,657.09 Tax Collector () Columbia County Tax Assessment Office 4,405.18 State Treasurer 1000.00	llows:
Transfer Taxes 2,657,09 \$ \$42,947.09 \$ \$42,947.09 \$ \$3,050.00 \$ \$3,050.00 \$ \$3,050.00 \$ \$3,977.09 \$ \$27PENSES: Columbia County Sheriff - Costs \$ \$482.70 \$ \$90,00 \$ \$1,272.70 \$1,272.70 \$ \$1,272.70 \$ \$1,272.70 \$ \$1,272.70 \$ \$1,272.70	
Total Needed to Purchase \$ \$42,947.00	
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Balance Needed to Purchase 38,977.09	<u> </u>
Columbia County Sheriff - Costs	
Poundage 790.00 \$ 1,272.70	
Poundage 790.00 \$ 1,272.70	
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Solicitor	
Columbia County Prothonotary	
Columbia County Recorder of Deeds - Deed copy work Realty transfer taxes 2,657,09 State stamps Tax Collector (Columbia County Tax Assessment Office State Treasurer 100 00	<u> </u>
Realty transfer taxes 2,657,09 State stamps Tax Collector () Columbia County Tax Assessment Office. 4,405,18 State Treasurer 100 00	 .
Tax Collector () Columbia County Tax Assessment Office. /, /405.18 State Treasurer	
Tax Collector () Columbia County Tax Assessment Office	
Columbia County Tax Assessment Office 4,405,18 State Treasurer 100,00	
State Treasurer	
TOTAL EXPENSES: \$ 9.508.96	_ .
Total Needed to Purchase \$ 42,947.09	
Less Expenses Control rectangle of the contr	
Net to First Lien Holder 30,673.53	
Plus Deposit 2,400 00	
Total to First Lien Holder \$ 33,073.53	
heriff's Office, Bloomsburg, Pa. So answers Balance to Value Added 364.60	
Harry A. Poadarnel Jr. Columbia Co	Sheriff



PHONE (570) 389-5622

SHERIFF OF COLUMBIA COUNTY COURT HOUSE - P.O. BOX 380 BLOOMSBURG, PA 17815

FAX: (570) 389-5625

FEB. 22, 2001

24 HOUR PHONE (570) 784-6300

Thomas X. Flaherty Value Added Investment Corp. 14 Paoli Court Paoli, PA 19301-4185

Dear Sir:

As you know the properties at 83 Reservoir St and 248-252 Sterner Ave., Bloomsburg, Pa., were recently sold at a Sheriff's Sale, due to mortgage foreclosure 257-2000 and 450-2000. They were sold on Jan. 18, 2001. After the distribution of funds from the Sale, there was a surplus and therefore you are entitled to it. Check No. 13441, in the amount of \$364.60 is being enclosed and also a copy of the distribution sheet, if it is of any interest to you as to where the monies were distributed.

Should there be any questions, feel free to contact me.

Sincerely,

Harry A. Roadarmel Jr. Sheriff

BY: Steven L. Sugarman, Esquire IDENTIFICATION NO. 32473 1273 LANCASTER AVENUE BERWYN, PA 19312-2607 (610) 889-0700

ATTORNEY FOR Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania Bank and Trust Company

KEYSTONE FINANCIAL BANK, N.A., successor-in-interest to PENNSYLVANIA BANK AND TRUST COMPANY 601 Dresher Road Horsham, PA 19044

٧.

FAX: (610) 993-0498

VALUE ADDED INVESTMENT CORP.

14 Paoli Court Paoli, PA 19301-4185 and THOMAS X. FLAHERTY

P.O. Box 215 Clothier Springs Road Valley Forge, PA 19481 Columbia County
Court of Common Pleas
Civil Division

No. 2000-CV-450

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

TO: Value Added Investment Corporation and Thomas X. Flaherty

Your real estate located at 83 Reservoir Street, Bloomsburg, Pennsylvania and 248-252 Sterner Avenue, Bloomsburg, Pennsylvania, is to be sold at Sheriff's Sale on Thursday, at a.m. in the Columbia County Courthouse, Bloomsburg, Pennsylvania, 17815.

NOTICE OF OWNER'S RIGHTS YOU MAY BE ABLE TO PREVENT THIS SHERIFF'S SALE

To prevent this Sheriff's Sale you must take IMMEDIATE ACTION:

1. The sale will be canceled if you pay to Keystone Financial Bank, N.A. in c/o Steven L. Sugarman & Associates, Attorneys for Plaintiff, at 1273 Lancaster Avenue, Berwyn, Pennsylvania, 19312-2607, by certified check, money order, or other immediately payable funds, the amount of the Judgment, interest, costs and fees due. To find out how much you must pay, you may call: Steven L. Sugarman & Associates, at (610) 889-0700.

- 2. You may be able to stop the sale by filing a Petition asking the Court to strike or open the Judgment, if the Judgment was improperly entered. You may also ask the Court to postpone the sale for good cause.
 - You may also be able to stop the sale through other legal proceedings.
- 4. You may need an attorney to assert your rights. The sooner you contact one, the more chance you will have of stopping the sale. (See notice below on how to obtain an attorney).

YOU MAY STILL BE ABLE TO SAVE YOUR PROPERTY AND YOU HAVE OTHER RIGHTS EVEN IF THE SHERIFF'S SALE DOES TAKE PLACE.

- 1. If the Sheriff's Sale is not stopped, your property will be sold to the highest bidder. You may find out the price bid by calling the Columbia County Sheriff's Office at (570) 389-5624.
- 2. You may be able to Petition the Court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.
- 3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened you may call the Sheriff's Office at (570) 389-5624.
- 4. If the amount due from the buyer is not paid to the Sheriff, you will remain the owner of the property as if the sale never happened.
- 5. You have a right to remain in the property until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.
- 6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money bid for your house will be filed by the Sheriff on a date specified by the Sheriff not later than thirty (30) days after sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after the filing of the schedule.
- 7. You may also have other rights and defenses or ways of getting your house back if you act immediately after the sale.

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 LISTED BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

SUSQUEHANNA LEGAL SERVICES 168 East 5th Street Bloomsburg, PA 17815 Telephone (570) 784-8760



PHONE (717) 369-3622

SHERIFF OF COLUMBIA COUNTY COURT HOUSE - P.O. BOX 380 BLOOMSBURG, PA 17815 FAX: (717) 784-0257

24 HOUR PHONE (717) 784-6389

SHERIFF'S REAL ESTATE FINAL COST SHEET

Leystone Financial	vs Value A	dded	
110. <u>257-00</u> E.D.			_ J. D.
DATE OF SALE: 1-18-01		•	•
BID PRICE (INCLUDES COSTS)	\$ 39500,00		
POUNDATE2% OF BID PRICE	\$_790,60		
TRANSFER TAX 2%, FAIR MARKET PRICE	<u>\$- 3657,09</u>	•	
MISC. COSTS	\$		
TOTAL AMOUNT NEEDED TO PURCHASE		542947.09	
PURCHASER(S): Sharon Babb ADDRESS: 7-7 Maiket S NAME(S) ON DEED: PURCHASER(S) SIGNATURE(S):	- DA 7. B/con 15/24 13 (Decen) Le	214 Gleun Bloomsbare	Aue PO 632
AMOUNT RECEIVED BY PURCHASER:			
	TOTAL AMOUNT DUE	\$ 42947.09	
	LESS DEPOSIT	\$	
	DOWN PAYMENT	\$ 3950,00	•
•	TOTAL DUE IN EIGHT DAYS	<u> 38997,09</u>	

Time: 03:48 PM Receipt Page 1 of 1 Received of: Col Cty Sheriff's Office \$ 10.00 Ten and 00/100 Dollars Amount

Columbia County Court of Common Pleas

0012238

10.00

10.00

NO.

Check: 13435

Payment Method: Check

Amount Tendered:

Date: 02/21/2001

Misc Fee

Total:

10.00

Clerk: BSILVETT

Tami Kline, Prothonotary

Ву:

Deputy Clerk



- 714000 1327**0**23777 1370-389-5622

SHERIFF OF COLUMBIA COUNTY COURT HOUSE - P.O. BOX 200 BLOOMSBURG, PA 17015

44 HEALTH PRODUCTS (VIV)

Steven L. Sugarman & Associates 1273 Lnacaster Ave. Berwyn, PA 19312

IN THE COURT OF COMMON PLEAS OF COLUMBIA COUNTY, COMMONWEALTH OF PENNA.

Keystone Financial Bank VS.

Value Added Investment Corporaton WRIT OF EXECUTION 257-00 ED (MORTCAGE FORECLOSURE) 450-00 JD

POSTING OF PROPERTY

	——————————————————————————————————————
December 18, 2000	POSTED A COPY OF THE SHERIFF'S SALE BILL
ON THE PROPERTY OF Value Adde	ed Investment Corporation
COLUMBIA COUNTY, PUNNSYLVANIA. Sa SHERIFF Timothy Chamberlain	AID POSTURG PERFORMED BY COLUMBIA COUNTY DEPUTY
	DEPUTY SHERIFF
	SHERIFF HARRY A ROADARHEL, JR.
Sworn and subscribed before me	
this 26th day of	
December 2000	
Sarah J. Hower	

NOTARIAL SEAL SARAH J. HOWER, Notary Public Bloomsburg, Columbia County, PA My Commission Expires June 21, 2003



257-00 ED

PHONE (570) 389-5622

* DOCKET ALL DATES

SHERIFF OF COLUMBIA COUNTY COURT HOUSE • P.O. BOX 380 BLOOMSBURG, PA 17815 FAX: (570) 784-0257

24 HOUR PHONE (570) 784-6300

SHERIFF'S SALE REAL ESTATE OUTLINE
RECEIVED AND TIME STAMP WRIT
DOCKET AND INDEX 11-6-00
SET FILE FOLDER UP 11-6-00
CHECK FOR PROPER INFO
WRIT OF EXECUTION
COPY OF DESCRIPTION 10
WHEREABOUTS OF LAST KNOWN ADDRESS
NON-MILITARY AFFIDAVIT
NOTICES OF SHERIFF'S SALE 13
WATCHMAN RELEASE FORM V
AFFIDAVIT OF LEINS LIST
CHECK FOR \$1300-00 \$ 5560 - 72,400.00 - 1777
* IF ANY OF THE ABOVE ARE MISSING DO NOT PROCEDE ANY FURTHER WITH SALE NOTIFY THE ATTY TO SEND ADDITIONAL INFO.
SET SALE DATE AND ADV. DATES AND POSTING DATES JAN. 18, 2000 Post Dec. 18 2000
POST ALL DATES ON CALANDER Dec. 23, 2000 / Sign. 4/1, 200/
* SET SALE DATE AT LEAST 2 MONTHS AFTER RECEIVING WRIT * SET ADV. DATES 3 THURSDAYS BEFORE SALE DATE TO RUN EVERY THUR. 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 LEIN HOLDERS *NOTICE OF SALE DIRECTED TO THEM
SEND NOTICES TO LIEN HOLDERS VIA CERT. MAIL OR SENDERS RECEIPT

ONCE DEFENDANTS ARE SERVED CKET COSTS AND INFO				
SEND ATTY RETURN OF SERVICE AND COPY OF SENDERS RECEIPTS FOR LEIN HOLDERS				
SALE BILLS				
SEND DESCRIPTION TO PRINTER				
** THE FOLLOWING NOTICES REQUIRE A LETTER WITH EXPLAINATIONS				
SEND NOTICE TO PRESS DIRECTING WHEN TO ADV.				
SEND NOTICES TO LOCAL TAX COLLECTORS				
NOTICES TO FEDERAL AND STATE TAX AUTH.				
NOTICES TO WATER AND SEWER AUTH.				
IF BUSINESS SEND COPY TO SBA AUTH.				
$\it HANDBILLS$				
SEND COPIES OF HANDBILLS TO:				
RECORDER'S OFFICE				
TAX CLAIM OFFICE				
TAX ASSESSMENT OFFICE				
PROTH OFFICE (POST ON BOARD)				
POST IN FRONT LOBBY				
POST IN SHERIFF'S OFFICE				
SEND COPY TO ATTY				
POST PROPERTY ACCORDING TO DATE SET				
SEND RETURN OF POSTING TO ATTY				
DOCKET ALL COSTS				
PREPARE COST SHEET 2 DAYS BEFORE SALE * BE SURE ALL COSTS ARE RECEIVED				
PREPARE FINAL COSTS SHEET DAY OF SALE				
HOLD SALE				
POST PROPOSED SCHEDULE OF DISTRIBUTION ACCORDING TO DATE				
PAY DISTRIBUTION ACCORDING TO DATE				
* WHEN PAYING INCLUDE ADDRESS OF CHANGE OF OWNER TO WHOM IT MAY CONCERN				
RECORD SHERIFF FEES COLLECTED ON MONTHLY REPORT				
PREPARE DEED AND TAX AFFIDAVIT TO BE RECORDED				
WHEN DEED IS RECORDED SEND TO BUYER				
FILE FOLDER				



SHERIFF OF COLUMBIA COUNTY COURT HOUSE - P. O. BOX 380

PHONE 570-389-5622

BLOOMSBURG, PA 17815

24 HOUR PHONE (717) 784-6300 FAX 570 389-5625

Date:	Nov. 7, 2000	_
To:	Mary Ward- Tax Collector	
	301 E. 2nd St.	
	Bloomsburg, PA 1/815	
		•
	-	_
Re: <u>K</u>	evstone Financial Bank, N.A.	VS. Value Added Investment Corp. and Thomas X. Flahert
No:	257 of 2000 ED	No: 459 of 2000 JD
Dear S	Sir:	
_	inclosed is a matical as	

Enclosed is a notice of an upcoming Sheriff's Sale. If you have any claims against this property, notify this office **IMMEDIATELY**.

Please feel free to contact me with any questions you may have.

Respectfully,

Harry A. Roadarmel, Jr. Sheriff of Columbia County

BY: Steven L. Sugarman, Esquire IDENTIFICATION NO. 32473 1273 LANCASTER AVENUE BERWYN, PA 19312-2607 (610) 889-0700 FAX: (610) 993-0498

ATTORNEY FOR Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania Bank and Trust Company

KEYSTONE FINANCIAL BANK, N.A.,

successor-in-interest to PENNSYLVANIA BANK AND

TRUST COMPANY

601 Dresher Road Horsham, PA 19044

٧.

VALUE ADDED INVESTMENT CORP.

14 Paoli Court
Paoli, PA 19301-4185 and
THOMAS X. FLAHERTY

P.O. Box 215 Clothier Springs Road Valley Forge, PA 19481 Columbia County
Court of Common Pleas
Civil Division

No. 2000-CV-450

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

TO: Value Added Investment Corporation and Thomas X. Flaherty

Your real estate located at 83 Reservoir Street, Bloomsburg, Pennsylvania and 248-252 Sterner Avenue, Bloomsburg, Pennsylvania, is to be sold at Sheriff's Sale on Thursday, Jan 18 Joo | at 10 a.m. in the Columbia County Courthouse, Bloomsburg, Pennsylvania, 17815.

NOTICE OF OWNER'S RIGHTS YOU MAY BE ABLE TO PREVENT THIS SHERIFF'S SALE

To prevent this Sheriff's Sale you must take IMMEDIATE ACTION:

1. The sale will be canceled if you pay to Keystone Financial Bank, N.A. in c/o Steven L. Sugarman & Associates, Attorneys for Plaintiff, at 1273 Lancaster Avenue, Berwyn, Pennsylvania, 19312-2607, by certified check, money order, or other immediately payable funds, the amount of the Judgment, interest, costs and fees due. To find out how much you must pay, you may call: Steven L. Sugarman & Associates, at (610) 889-0700.

- 2. You may be able to stop the sale by filing a Petition asking the Court to strike or open the Judgment, if the Judgment was improperly entered. You may also ask the Court to postpone the sale for good cause.
 - 3. You may also be able to stop the sale through other legal proceedings.
- 4. You may need an attorney to assert your rights. The sooner you contact one, the more chance you will have of stopping the sale. (See notice below on how to obtain an attorney).

YOU MAY STILL BE ABLE TO SAVE YOUR PROPERTY AND YOU HAVE OTHER RIGHTS EVEN IF THE SHERIFF'S SALE DOES TAKE PLACE.

- 1. If the Sheriff's Sale is not stopped, your property will be sold to the highest bidder. You may find out the price bid by calling the Columbia County Sheriff's Office at (570) 389-5624.
- 2. You may be able to Petition the Court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.
- 3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened you may call the Sheriff's Office at (570) 389-5624.
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- 5. You have a right to remain in the property until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.
- 6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money bid for your house will be filed by the Sheriff on a date specified by the Sheriff not later than thirty (30) days after sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after the filing of the schedule.
- 7. You may also have other rights and defenses or ways of getting your house back if you act immediately after the sale.

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 LISTED BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

SUSQUEHANNA LEGAL SERVICES 168 East 5th Street Bloomsburg, PA 17815 Telephone (570) 784-8760

PREMISES A

TRACT NO. 1:

ALL THOSE CERTAIN - piece, parcels and tracts of land situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a point in the northerly line of Reservoir Street at the southwesterly corner of lot No. 13, thence along lot No. 13 in a northwesterly direction to the southerly line of Ridge Alley; thence along the southerly line of Ridge Alley, a distance of 80 feet, more or less, to line of lot No. 10; thence along the line of lot No. 10 in a southerly direction to the northerly line of Reservoir Street aforesaid; thence along the northerly line of said Reservoir Street a distance of 80 feet, more or less, to the line of Lot No. 13, the place of beginning, and being Lots Numbered 11 and 12 in the plan of the Schoch and Funston Addition to the Town of Bloomsburg.

TRACT NO. 2:

ALL THOSE TWO CERTAIN pieces, parcels and tracts of land situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to wit:

BOUNDED on the north by Ridge Alley; on the east by Lot No. 15 in said Addition; on the south by Reservoir Street and on the west by Lot No. 12 in said Addition; said lots having a frontage of 40 feet each, more or less, on Reservoir Street and extending a like width to Ridge Alley aforesaid and being marked and numbered as Lots No. 13 and 14 on plot of lots of the said Schoch and Funston Addition recorded in the Recorder's Office at Bloomsburg, PA in Map Book 1, page 80, which plot by reference is made a part thereof. Upon Lot No. 13 there is erected a two and a half story frame dwelling house.

TRACT NO. 3:

ALL THOSE FOUR, adjoining lots of land situate in the Schoch and Funston Addition to the Town of Bloomsburg, County of Columbia, and State of Pennsylvania, bounded and described as follows, to wit:

BOUNDED on the north by Ridge Alley, on the East by Lot No. 11, on the south by Reservoir Street, and on the west by Lot No. 6. Having a frontage of 160 feet on Reservoir Street and being marked and designated as Lots Nos.. 7, 8, 9 and 10 in the plot of lots of the said Schoch and Funston Addition to the Town of Bloomsburg, as recorded in the Office of the Recorder of Deeds at Bloomsburg, PA in Map Book 1, page 80.

BEING KNOWN AS 83 Reservoir Street

PREMISES B

ALL THAT CERTAIN piece, parcel and tract of land situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a corner in line of land of Barton Beagle; thence by said line, north 28 degrees 45 minutes west 72 feet 6 inches to a corner upon the southern line of Sterner Avenue; thence by the southern line of said Avenue, south 60 degrees 15 minutes west 35 feet 9 inches to a corner of lot late of Anna E. Kahler, now Crawford; thence by the same, south 28 degrees 45 minutes east 68 feet 3 inches to a corner; thence by other lands late of George W. Wampole, now Pealer, north 68 degrees 30 minutes east 36 feet to a corner, the place of beginning. UPON which is erected a double frame dwelling house.

BEING KNOWN AS 248-252 Sterner Avenue.

ATTORNEYS AT LAW

1273 LANCASTER AVENUE BERWYN, PENNSYLVANIA 19312

> (610) 889-0700 FAX (610) 993-0498

STEVEN L. SUGARMAN ROBERT M. MULHERN, JR. ELLIOT H. BERTON* KAREN EISNER ZUCKER ANDREW M. CALVELLI

*ALSO MEMBER NJ. BAR

October 27, 2000

NEW JERSEY OFFICE:
TARRAGON EXECUTIVE CENTER
811 CHURCH ROAD, SUITE 105
CHERRY HILL, NEW JERSEY 08002
(856) 486-7808

Harry A. Roadarmel, Sheriff of Columbia County P.O. Box 380 Bloomsburg, PA 17815

Re:

Keystone Financial Bank, N.A., Successor-in-Interest to Pennsylvania National Bank and Trust Company v. Value Added

Investment Corp. and Thomas X. Flaherty

Docket No. 2000-CV-450

Dear Sheriff Roadarmel:

Enclosed herewith please find three (3) original Writs of Execution together with copies of the Affidavit Pursuant Pa. R.C.P. No. 3129.1, a Certification Pursuant to Act 91, a Waiver of Watchman, twelve (12) copies of the Goldman Notice and a Notice Under Rule 2958.2 of Judgment and Execution thereon, Notice of Exemption Right, Claim for Exemption, and two self-addressed stamped envelopes in connection with the above-referenced matter. Kindly schedule the real estate known as and located at 83 Reservoir Street and 248-252 Sterner Avenue, Bloomsburg, Pennsylvania for sale, and provide us with the date and time. We shall insert such information in our Sheriff's sale notices and serve same upon the Defendants, each of which are resident in Chester County.

We have enclosed our firm check in the amount of \$2,400.00 as a deposit to schedule the sale and we respectfully request that you notify us if you require any additional documents or information in connection herewith.

Thank you for your customary courtesy and assistance.

Very truly yours,

STEVEN L. SUGARMAN & ASSOCIATES

Elliot H. Berton



PHONE (570) 389-5622

SHERIFF OF COLUMBIA COUNTY COURT HOUSE - P.O. BOX 380 BLOOMSBURG, PA 17815 Fax (570)389-5625

24 HOUR PHONE (570) 784-6300

PRESS/ENTERPRISE Lackawanna Avenue Bloomsburg, PA 17815

Date:	Nov. 7, 2	2000							
Re:	Sheriff's	Sale A	dvertisin	g Dates					
	Keystone	Fin. Ba	mkVS. Val	ue Added	Investmen	t Corp.	and Thomas	<u>Y. Fla</u> her	ty
	No. 257		_of2000	_ED No.	450	of	2000	JD	
Dear	Sir:								
	Please Adve	ertise	the enclos	sed SHERI	FF SALE or	n the fo	llowing date	:\$:	
	1st v	week	December	28, 2000	·	SALE	Janusry 18,	2001 at	10:00 AM
	2nd v	week	January 4	, 2001			- 		
	3rd v	week	January 1	1, 2001					
F	eel free to	o conta	ct me if y	ou have	any questi	lons.			

Respectfully,

Harry A. Roadarmel, Jr. Sheriff

BY: Steven L. Sugarman, Esquire
IDENTIFICATION NO. 32473
1273 LANCASTER AVENUE
BERWYN, PA 19312-2607
(610) 889-0700
FAX: (610) 993-0498

ATTORNEY FOR Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania Bank and Trust Company

KEYSTONE FINANCIAL BANK, N.A., successor-in-interest to PENNSYLVANIA BANK AND TRUST COMPANY
601 Dresher Road

601 Dresher Road Horsham, PA 19044

٧.

VALUE ADDED INVESTMENT CORP.

14 Paoli Court Paoli, PA 19301-4185 and THOMAS X. FLAHERTY

P.O. Box 215 Clothier Springs Road Valley Forge, PA 19481 Columbia County
Court of Common Pleas
Civil Division

No. 2000-CV-450

AFFIDAVIT PURSUANT TO PA. R.C.P. 3129.1

Keystone Financial Bank, N.A., successor-in-interest to Pennsylvania National Bank and Trust Company, Plaintiff in the action, sets forth as of the date the Praecipe for the Writ of Execution was filed, the following information concerning the real property located at 83 Reservoir Street, Bloomsburg, Pennsylvania, 17815 (Premises A) and 248-252 Sterner Avenue, Bloomsburg, Pennsylvania, 17815 (Premises B).

- Name and address of Owner(s) or Reputed Owner(s): Value Added Investment Corporation 14 Paoli Court Paoli, PA 19301
- Name and address of Defendant(s) in the Judgment:

Value Added Investment Corporation 14 Paoli Court Paoli, PA 19301

Thomas X. Flaherty Box 215 Clothier Springs Road Valley Forge, PA 19481 Name and last known address of every Judgment Creditor whose Judgment is a recorded lien on the real property to be sold:

Bloomsburg Municipal Authority 301 East Second Street Bloomsburg, PA 17815

Keystone Financial Bank, N.A. successor-in-interest to Pennsylvania National Bank and Trust Company 601 Dresher Road Horsham, PA 19044

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

Pennsylvania National Bank and Trust Company, n/k/a Keystone Financial Bank, N.A. 601 Dresher Road Horsham, PA 19044

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

None known.

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

None known.

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:

Ms. Sharon Babb 727 Market Street Bloomsburg, PA 17815

STEVEN L. SUGARMAN & ASSOCIATES

Steven L. Sugarman, Esquire

Elliot H. Berton, Esquire Attorneys for Plaintiff

Sworn to and subscribed before me this down as

Mary Jane Moore, Notary Public Tredyffrin Twp., Chester County My Commission Expires Jan. 18, 2001

Member, Pennsylvania Association of Member Man & ASSOCIATES • 1273 LANCASTER AVENUE • BERWYN, PA 19312-2607

Bv: