Paula J. Barry, Publisher's Assistant, being duly sworn according to law deposes and says that Press Enterprise is a newspaper of general circulation with its principal office and place of business at 3185 Lackawanna Avenue, Bloomsburg, County of Columbia and State of I ennsylvania, and was established on the 1st day of March, 1902, and has been published daily continuously in said Town, County and State since the day of its establishment: that hereto attached is a copy of the notice or advertisement in the <u>July 17.24, 31, 2002</u> exactly as printed and published; that the affiant is one of the owners and publishers of said newspaper in which legal advertisement was published; that neither the affiant nor Press Enterprise is interested in the subject matter of said notice and advertisement and that all of the allegations in the foregoing statement as to time, place, and character of publication are true.

Sworn and subscribed to before me this 15+ day of AUCUST 2003
(Notary Public)
My commission expires  Gotz al Seal  Denois L. Ashenfelder, Notary Public Scott Twp., Columbia County My Commission Expires July 3, 2003  Member, Pennsylvania Association of Notaries
And now,, 20, I hereby certify that the advertising and
publication charges amounting to \$for publishing the foregoing notice, and the
fee for this affidavit have been paid in full.

## THE LAW Offices of

1310 Industrial Boulevard 1st Floor, Suite 101 Southampton, PA 18966

GREGORY JAVARDIAN

Phone: (215) 942-9690 Fax: (215) 942-9695

August 7, 2002

Sheriff's Office of Columbia County P.O. Box 380 Bloomsburg, PA 17815

RE: COPE, Lawrence W. & Susan R.

2015 N. Market Street

Berwick, PA SALE: 8/7/02 No. 1115CV2001

#### Dear Sir/Madam:

Enclosed please find our check in the amount of \$1,214.64 as settlement and the Realty transfer affidavits with regards to the above case. Kindly have the sheriff's deed placed into CONSECO FINANCE SERVICING CORP., whose address is 7360 So. Kyrene, Tempe, AZ 85283.

If you should have any questions, please feel free to contact the office.

Very truly yours,

lean Hesser

For The Law Office of Gregory Javardian

/jh

Enclosure

\*EV-183 EX ...-96)



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF REVENUE BUREAU OF INDIVIDUAL TAXES DEPT. 280603 HARRISBURG, PA 17128-0603

#### REALTY TRANSFER TAX STATEMENT OF VALUE

See Reverse for Instructions

	RECORDER'S USE ONLY	
• Tax Paid		•
Book Number		
age Number		
Date Recorded		

Complete each section and file in duplicate with Recorder of Deeds when (1) the full value/consideration is not set forth in the deed, (2) when the deed is without consideration, or by gift, or (3) a tax exemption is claimed. A Statement of Value is not required if the transfer is wholly exempt from tax

based on: (1) family relationship or (2) publ	ic utility easement. If more	space is needed, attac	h additional sheet(s).
A CORRESPONDENT - A	All inquiries may b	e directed to the	he following person:
Name			Telephone Number:
LAW OFFICE OF GREGOR			Area Code ( 215 ) 942-9690
Street Address 1310 INDUSTRIAL ROLLEY	City L/ARD SILLTE 101		State Zip Code  Zip Code  Zip Code  Zip Code
······································	VAND, SOITE TO	Date of Acceptance of	
B TRANSFER DATA Grantor(s)/Lessor(s)		Grantee(s)/Lessee(s)	
Sheriff of Columbia Count	v	1	inance Servicing Corp.
Street Address	<u> </u>	Street Address	and but viering but p.
P.O. Box 380		7360 So K	yrene
City State	Zip Code	City	State Zip Code
Bloomsburg PA	17815	Tempe	AZ 85283
C PROPERTY LOCATION	V		
Street Address		City, Township, Boroug	jh
2015 N. Market Street		Berwick	
County	School District		Tax Parcel Number
Columbia	Berwick	···	04B-01-009
D VALUATION DATA			
1. Actual Cash Consideration	2. Other Consideration		3. Total Consideration
\$25,000.00 4. County Assessed Value	+ 0.00 5. Common Level Ratio F		= \$25,000.00 6. Fair Market Value
		acioi	
\$31,768.00	x 2.80	•	= \$88,950.40
E EXEMPTION DATA  1a. Amount of Exemption Claimed	1b. Percentage of Interes	t Conveyed	
100%	100%	· comroyec	
2. Check Appropriate Box Below for Exe  Will or intestate succession  Transfer to Industrial Development A  Transfer to a trust. (Attach complete  Transfer between principal and age  Transfers to the Commonwealth, the (If condemnation or in lieu of conde  Transfer from mortgagor to a holde  Corrective or confirmatory deed. (A  Statutory corporate consolidation, n	(Name of De Agency.  Agency.  Acopy of trust agreement id nt. (Attach complete copy of United States and Instrume mnation, attach copy of restroic a mortgage in default. ttach complete copy of the	entifying all benefician of agency/straw party entalities by gift, dedic olution.) Mortgage Book Numl prior deed being corre	agreement.) cation, condemnation or in lieu of condemnation.  200000879 ber, Page Number Recorded 1/28/0
Other (Please explain exemption do	simea, ir other than listed al	pove.;	
Under penalties of law, I declare that I hav and belief, it is true, correct and complet Signature of Correspondent or Responsible Pa	e.	, including accompan	ying information, and to the best of my knowled
	Ma Da	-12-	8/7/02

FAILURE TO COMPLETE THIS FORM PROPERLY OR ATTACH APPLICABLE DOCUMENTATION MAY RESULT IN THE RECORDER'S REFUSAL TO RECORD THE DEED.

	081064/1_90				
Conseco v. COPE, Lawrence	MEMO	One Thousand Two Hundred Fourteen and 64/100***********************************	PAY TO THE Sheriff ORDER OF	ITE LAW OFFICES OF GREGORY JAVARDIAN  ESCROW ACCOUNT  1310 INDUSTRIAL BLVD., SUITE 101  SOUTHAMPTON, PA 18966	
1603763""/ Ohn		<b>电影技术的 医水液 医水液 法有效 计多数 化二氯甲基苯酚 医水杨二二酚 医二甲甲基苯酚 计多数 医水杨二二甲甲基苯酚 计多数 医水杨二二甲甲基甲基酚甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基</b>	<b>\$ **</b> 1,214.64	FIRSTRUST BANK 3-7380-2360 08/07/2002	
*	Security Features In	DOLLARS eluded.	Details on t	1.0	11662

f you desire a receipt, send a self-addressed stamped envelope with your payment THIS TAX NOTICE MUST BE RETURNED WITH YOUR PAYMENT PHONE:570-752-7442 TAXES ARE DUE & PAYABLE - PROMPT PAYMENT IS REQUESTED HOURS MON, TUE, THUR & FRI : 9:30AM - 4PM MAKE CHECKS PAYBLE TO: Tax Notice 2002 County & Municipality Connie C Gingher 1645 Lincoln Avenue Berwick PA 18603 CLOSED FRIDAY AFTER DISCOUNT CLOSED WEDNESDAY & HOLIDAYS BERWICK PA 18603 2015 NORTH MARKET STREET COPE SUSAN R & LAWRENCE W FIRE BORO RE have been calculated for your convenience LHBIL SINKING FOR: COLUMBIA COUNTY GENERAL The discount & penalt DESCRIPTION 2015 N MARKET ST PARCEL: 04B-01 -009-00,000 .124 Acres Penalty Discount PAY THIS AMOUNT ASSESSMENT 31,768 Total Assessment CNTY 2 % 10 % MILL Buildings 4.846 .845 1.05 1.25 5.8 Land 5% 2% If paid on or before If paid on or before LESS DISCOUNT DATE 03/01/2002 April 30 429.34 180.56 150.87 26.30 32.69 38.92 31,768 29,268 2,500 TAX AMOUNT DUE INCL PENALTY June 30 438.11 184.25 153.95 26.84 33.36 39.71 January 1, 2003 courthouse on: This tax returned to BILL NO. 2957 If paid after June 30 469.06 193.46 169.35 29.52 35.03 41.70

## SHERIFF'S SALE COST SHEET

Conseco Finance Solution VS NO. 59-02 ED NO. 1115-01 J	s. Law wance	° & Susan Ce	%)€.
NO. 37-62 ED NO. 1/15-01 J	D DATE/TIMI	E OF SALE <u>8</u> -7-0よ	0900
DOCKET/RETURN	\$15.00		
SERVICE PER DEF.	\$ 195,00		
LEVY (PER PARCEL	\$15.00		
MAILING COSTS	\$ 27,50		
ADVERTISING SALE BILLS & COPIES	\$17.50		
ADVERTISING SALE (NEWSPAPER)	\$15.00		
MILEAGE	s 16,00		
POSTING HANDBILL	\$15.00		
CRYING/ADJOURN SALE	\$10.00		
SHERIFF'S DEED	\$35.00		
TRANSFER TAX FORM	\$25.00		
DISTRIBUTION FORM	\$25.00		
COPIES NOTARY TOTAL *********	\$ <u>6,50</u>		
NOTARY	\$ 12.00	d. a ma	
TOTAL ********	**********	<u>1424,50</u>	
WEB POSTING	\$150.00		
PRESS ENTERPRISE INC.	S 568.58		
SOLICITOR'S SERVICES	\$75.00		
SOLICITOR'S SERVICES TOTAL ************************************	*******	1793.58	
		<del></del>	
PROTHONOTARY (NOTARY)	\$10.00		
RECORDER OF DEEDS	\$ <u>3/50</u>	11 - 0	
PROTHONOTARY (NOTARY) RECORDER OF DEEDS TOTAL ************************************	********	4/50	
REAL ESTATE TAXES:			
N DODG GIVE	e 419 0C		
SCHOOL DIST. 20	\$ <u>469.06</u> \$		
DELINOUENT 20	\$		
DELINQUENT 20 TOTAL ********	*********	479 06	
	Ψ.	771703	
MUNICIPAL FEES DUE:			
SEWER 20	\$		
WATER 20	\$		
WATER 20 TOTAL ********	******		
•••	-	. 1 w	
SURCHARGE FEE (DSTE)	S. S.	140.00	
MISC. Luz. Co. Solvice	\$ <u>6//00</u>		
SURCHARGE FEE (DSTE) MISC. Luc. Co. Solice  * Source  TOTAL ************************************	\$ 120,00	15/10	
TOTAL ********	*******	10 1200	
TATAL CASTS (ABT	NUME TOTAL	- DAM	11
TOTAL COSTS (OPE	MING RID)	\$ <u>2064</u>	<u>57</u>

## COLUMBIA COUNTY SHERIFF'S OFFICE

SHERIFF'S REAL ESTATE FINAL COST SHEET

Conseco Finance Securions VS	Lawierce 25	usan Cape
	NO./1/5-01	•
DATE/TIME OF SALE: 5-7-62	0900	
BID PRICE (INCLUDES COST)	\$ 75,000.	
POUNDAGE – 2% OF BID	s <u>500.</u> -	
TRANSFER TAX – 2% OF FAIR MKT	\$	
MISC. COSTS TOTAL AMOUNT NEEDED TO PURCH.		
PURCHASER(S): Cuseco 7.  ADDRESS:	Jane & Servi	cing bep.
NAMES(S) ON DEED:		
PURCHASER(S) SIGNATURE(S):		
		· <u> </u>
TOTAL DUE;		\$ 2564,64
LESS DEPOSIT:		\$ 350.
DOWN PAYMENT:		\$
TOTAL DUE IN 8 D.	AYS	s 1214.44

Atty To Porchase

k	s your !	RETUR	IN AD	ORE	SS	CO	mp	late	ed (	on t	he r	eve	rse :	side?
PS Form <b>3811</b> , December 1984 102	6. Signayre: (Addressee or Agent)	5. Received By: ( <i>Print Name)</i>			Carson City, NV 89/06	11/ E. College Parkway	Trwin onton penk and trust		3. Article Addressed to:	delivered.	With "Refurn Receipt Requested" on the mailpiece below the article number.  The Defurn Receipt will show to whom the article was delivered and the date	Attach this form to the front of the mailpiece, or on the back if space does not permit	<ul> <li>Compared norms of the process of the form so that we can return the epirit your name and address on the reverse of this form so that we can return the card in your.</li> </ul>	SENDER:  Complete items 1 and/or 2 for additional services.
102595-97-8-0179 Domestic Return Receipt	; ;	8. Addressee's Address (Only If requested keend fee is paid)	7. Date of Delivery	☐ Return Receipt for Merchandise ☐ COD =	☐ Express Mail ☐ Insured .E.	☐ Registered 🔯 Certified 🛱	4b. Service Type	70011940000139918478	4a. Article Number	Consult postmaster for fee.	2.  Restricted Delivery	1. ⊠ Add		l also wish to receive the

#### HARRY A. ROADARMEL, JR.



PHONE (570) 389-5622 SHERIFF OF COLUMBIA COUNTY COURT HOUSE - P.O. BOX 380 BLOOMSBURG, PA 17815 FAX: (572) 784-0257

24 HOUR PHONE (570) 784-6300

CONSECO FINANCE SERVICING CORP.

59ED2002

VS

WRIT OF EXECUTION - MORTGAGE FORECLOSURE

LAWRENCE W. COPE SUSAN R. COPE

NOW, MONDAY, MAY 20, 2002, I, HON. HARRY A. ROADARMEL JR. HIGH SHERIFF OF COLUMBIA COUNTY, PENNSYLVANIA, DO HEREBY DEPUTIZE THE SHERIFF OF LUZERNE COUNTY PENNSYLVANIA, TO EXECUTE THIS WRIT DEPUTATION BEING MADE AT THE REQUEST AND RISK OF THE PLAINTIFF, PERSON TO SERVE, SUSAN COPE, AT 119 WALNUT DRIVE, BERWICK, PA

HARRY A. ROADARMEL, SHERIFF

COLUMBIA COUNTY, PENNSYLVANIA

Harry a. Roadamed &

#### HARRY A. ROADARMEL, JR.



PHONE (\$70) 389-5422 SHERIFF OF COLUMBIA COUNTY COURT HOUSE - P.O. BOX 380 BLOOMSBURG, PA 17815 FAX: (370) 784-0257

24 HOUR PHONE (570) 784-6300

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HARRY A. ROADARMEL, SHERIFF

COLUMBIA COUNTY, PENNSYLVANIA

Harry a. Roadanned Jo

Phone: 570-389-5622 Fax: 570-389-5625

### Columbia County Sheriff's Office



□ Urge		☐ Please Comment	□ Please Reply	☐ Please Recycle
Re:	Services – Cope Forecl	osure CC:		
Phone:		Pages	<b>3</b>	
Fax:		Date:	July 23, 2002	
То:	Tina	From:	Chief Deputy Char	mberlain

TDD (570) 825-1860

FAX: (570) 825-1849

### Luzerne County Sheriff's Department Luzerne County Courthouse



200 North River Street Wilkes-Barre, Pennsylvania 18711 (570) 825-1651

COLUMBIA COUNTY

02-ED-59

CONSECO FINANCE SERVICING CORPORATION

VS

LAWRENCE COPE, ET UX

STATE OF PENNSYLVANIA LUZERNE COUNTY, SS:

Prothonotary

MARK SENCZAKOWICZ , DEPUTY S	SHERIFF, for SHERIFF of said county, being duly sworn
according to law, deposes and says, that on	TUESDAY the 21ST day of
	, prevailing time, he served the within
WRIT OF EXECUTION, NOTICE OF SHERIFF'S SALE & D	
LAWDUNCE CODE	
upon LAWRENCE COPE	
the within named, by handing to SUSAN K. COPE	an adult member
of the household, whose relationship to the within nan	ned is that of IIIS WIFE
at HIS RESIDENCE, 119 WALNUT DRIVE, BERWICK, SAI	LEM TWP.,
in the County of Luzerne, State of Pennsylvania, a true	e and attested copy and making known the contents thereof.
Sworn to and subscribed before me this $\underline{^{22\mathrm{ND}}}$ day of $\underline{^{\mathrm{MAY}}}$ 20 $\underline{^{02}}$	Sheriff of Luzerne County
JUC Moran	Deputy Sheriff of Luzerne County, Pennsylvania

FAX: (570) 825-1849

# Luzerne County Courthouse



200 North River Street Wilkes-Barre, Pennsylvania 18711 (570) 825-1651

COLUMBIA COUNTY

02-ED-59

CONSECO FINANCE SERVICING CORPORATION

vs

LAWRENCE COPE, ET UX

## STATE OF PENNSYLVANIA LUZERNE COUNTY SS:

MARK SENCZAKOWICZ , DEPUT	Y SHERIFF, for SHERIFF of said county, being duly sworn
	at on <u>TUESDAY</u> the <u>21ST</u> day of
MAY 20 02 at 6:20 P.	M., prevailing time, he served the within WRIT OF EXECUTION,
NOTICE OF SHERIFF'S SALE & DESCRIPTION	
upon SUSAN K. COPE	
the within named, by handing to HER	personally, atHER RESIDENCE, 119 WALNUT DRIVE,
BERWICK, SALEM TWP.,	
	in the County of Luzerne, State of Pennsylvania, a
true and attested copy and making known the cont	tents thereof.
Sworn to and subscribed before me	J3/ SF
	Sheriff of Luzerne County
this day of 20	4
JED a. Moran	by Mark Sent
Prothonotary of Luzerne County	Deputy Sheriff of Luzerne County, Pennsylvania

#### HARRY A. ROADARMEL, JR.



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

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

CONSECO FINANCE SERVICING CORP.

VS.

LAWRENCE AND SUSAN COPE

WRIT OF EXECUTION #59 OF 2002 ED

#### POSTING OF PROPERTY

JULY 3, 2002 POSTED A COPY OF THE SHERIFF'S SALE BILL ON THE

PROPERTY OF LAWRENCE AND SUSAN COPE AT 2015 NORTH MARKET ST. BERWICK

COLUMBIA COUNTY PENNSYLVANIA. SAID POSTING PERFORMED BY COLUMBIA COUNTY

DEPUTY SHERIFF STEVE HARTZELL.

SO ANSWERS:

DEPUTY SHERIFF

SHERIFF, HARRY A ROADARMEL, JR.

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 11TH DAY OF JULY 2002

V NOTARIAL SEAL
WENDY WESTOVER, NOTARY PUBLIC
BLOOMSBURG, COLUMBIA CO., PA
MY COMMISSION EXPIRES NOVEMBER 07, 2005

THE LAW
Offices of

1310 Industrial Boulevard 1st Floor, Suite 101 Southampton, PA 18966

#### GREGORY JAVARDIAN

Phone: (215) 942-9690 Fax: (215) 942-9695

June 13, 2002

Sheriff's Office Columbia County Courthouse, P.O. Box 380 Bloomsburg, PA 17815

Attention: Tim

Re:

CONSECO FINANCE SERVICING CORP.

v. LAWRENCE W. COPE and SUSAN R. COPE

No. 2001-CV-1115

Premises: 2015 NORTH MARKET STREET, BERWICK, PA 18603

Dear Tim:

The above referenced property is scheduled for Sheriff's Sale on August 7, 2002.

The legal description indicates "SUBJECT TO MORTGAGE." Please be advised that our client has indicated that the mortgage which was prior to their mortgage being foreclosed was subordinated. Therefore, if possible, please remove that information from the legal description, advertising and any notices sent to Defendants.

If that wording cannot be removed, please advise if an announcement can be made at the sale indicating that the property is <u>NOT</u> being sold subject to mortgage.

Thank you in advance for your cooperation and attention to this matter.

Very truly yours,

Marie Keen for

Law Offices of Gregory Javardian

/mk

VIA TELECOPY (570) 389-5625

## SHERIFF'S SALE

#### WEDNESDAY AUGUST 7, 2002 AT 9:00 AM

BY VIRTUE OF A WRIT OF EXECUTION NO. 59 OF 2002 ED AND CIVIL WRIT NO. 1115 OF 2001 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 BIDDER, FOR CASH, IN A COURTROOM OR SHERIFF' OFFICE, TO BE ANNOUNCED, AT THE COLUMBIA COUNTY COURTHOUSE, BLOOMSBURG, PENNA., 17815, ALL THE RIGHT AND TITLE AND INTEREST TO THE DEFENDANTS IN AND TO:

ALL THAT CERTAIN piece or parcel of land, situate, lying and being in Berwick Borough, Columbia County, Pennsylvania, bounded and described as follows:

BEGINNING at a point on the southerly side of Market Street, at the corner of Lot #133; thence along Market Street in a westerly direction a distance of 45 feet to the corner of Lot #131; thence along said Lot in a southerly direction a distance of 120 feet to a 15 foot alley; thence along said alley in an easterly direction a distance of 45 feet to the corner of Lot #133; thence along said Lot in a southerly direction a distance of 120 feet to the place of beginning. Being Lot #132, Section Five, in the Park Real Estate Company Addition.

BEING known as 2015 North Market Street, Berwick, PA 18603.

Parcel No. 04B-01-009.

BEING THE SAME PREMISES which Susan R. Welsh, now by remarriage known as Susan R. Cope, by Indenture dated January 22, 2000 and recorded January 28, 2000 in the Office of the Recorder of Deeds for Columbia County, Pennsylvania, at Instrument #200000878, granted and conveyed unto Susan R. Cope and Lawrence W. Cope, wife and husband.

IMPROVEMENTS: RESIDENTIAL DWELLING.

#### 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 (8) days after the sale is cash, certified check or cashier's check.

IMPORT ANT 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 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.

Plaintiff's Attorney Gregory Javardian 1310 Industria! Blvd. Southampton, PA 18966

Sheriff of Columbia County Harry A. Roadarmel, Jr. www.sheriffofcolumbiacounty.com

## SHERIFF'S SALE

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Plaintiff's Attorney Gregory Javardian 1310 Industrial Blvd. Southampton, PA 18966

Sheriff of Columbia County Harry A. Roadarmel, Jr. www.sheriffofcolumbiacounty.com

## THE LAW Offices of

1310 Industrial Boulevard 1st Floor, Suite 101 Southampton, PA 18966

#### GREGORY JAVARDIAN

Phone: (215) 942-9690 Fax: (215) 942-9695

June 11, 2002

Sheriff of Columbia County Courthouse, P.O. Box 380 Bloomsburg, PA 17815

Attention: Deputy Arter

Re: CONSECO FINANCE SERVICING CORP.

v. LAWRENCE W. COPE and SUSAN R. COPE

No. 2001-CV-1115

Premises: 2015 NORTH MARKET STREET, BERWICK, PA 18603

Dear Deputy Arter:

This letter is to confirm our telephone conversation of June 10, 2002, wherein you advised that the above referenced property is scheduled for Sheriff's Sale on Wednesday, August 7, 2002, at 9:00 a.m.

Should you have any questions or need additional information, feel free to contact me.

Very truly yours,

Marié Keen for

GREGORY JAVARDIAN

/mk

VIA TELECOPY (570) 389-5625 AND REGULAR MAIL

THE LAW
Offices of

1310 Industrial Boulevard 1st Floor, Suite 101 Southampton, PA 18966

#### GREGORY JAVARDIAN

Phone: (215) 942-9690 Fax: (215) 942-9695

June 11, 2002

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CONSECO FINANCE SERVICING CORP.

v. LAWRENCE W. COPE and SUSAN R. COPE

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GREGORY JAVARDIAN

/mk

VIA TELECOPY (570) 389-5625 AND REGULAR MAIL

LAW OFFICES OF GREGORY JAVARDIAN By: GREGORY JAVARDIAN, ESQUIRE IDENTIFICATION NO. 55669 1310 INDUSTRIAL BOULEVARD 1ST FLOOR, SUITE 101 SOUTHAMPTON, PA 18966 (215) 942-9690

CONSECO FINANCE SERVICING CORP.

COURT OF COMMON PLEAS

COLUMBIA COUNTY

VS.

No.: 2001-CV-1115

LAWRENCE W. COPE SUSAN R. COPE

#### AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129.1

I hereby certify that I have sent copies of the Notice of Sheriff Sale to the Defendants' certified and regular United States mail and all lien holders or judgment creditors of record as required by Pa.R.C.P. by first class United States mail, postage prepaid, on the date set forth below. (See attached Exhibit "A").

Columbia County Domestic Relations P.O. Box 380 Bloomsburg, PA 17815

Columbia County Tax Claim Bureau P.O. Box 380 Bloomsburg, PA 17815

Dept. of Public Assistance 27 E. 7<sup>th</sup> Street, P.O. Box 628 Bloomsburg, PA 17815-9974

Tenants/Occupants 2015 NORTH MARKET STREET BERWICK, PA 18603

Dated: 6/12/02 \$ 7/17/02

LAWRENCE W. COPE 119 WALNUT DRIVE BERWICK, PA 18603

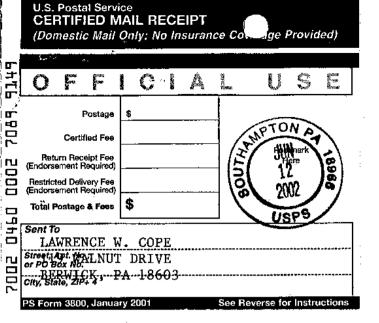
SUSAN R. COPE 119 WALNUT DRIVE BERWICK, PA 18603

Greentree Consumer Discount Company 332 Minnesota Street, Suite 610 St. Paul, MN 55101

Irwin Union Bank and Trust 117 E. College Parkway Carson City, NV 89706

GREGORY JAVARDIAM, ESQUIRE

Attorney for Plaintiff

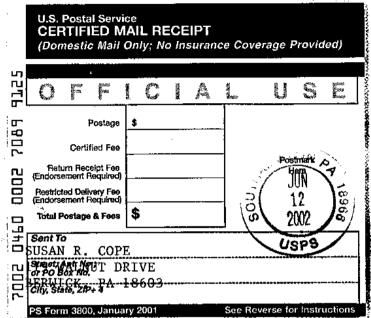


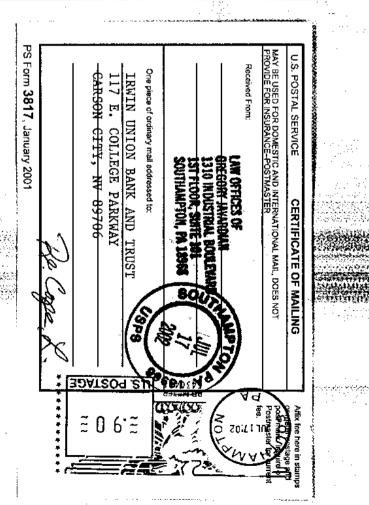
#### (Domestic Mail Only; No Insurance Coverage Provided) C 7089 Postage PTON Certified Fee SOUT Return Receipt Fee (Endorsement Required) ſŪ Restricted Delivery Fee (Endorsement Required) Total Postage & Fees 450 USPS TENANTS/OCCUPANTS TOTS AND THE MARKET STREET BERWICK PA-18603

**U.S. Postal Service** 

CERTIFIED MAIL RECEIPT

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Addressee Name, Street, and Factors and	Addressee Name, Street, and PO Address  COLUMBIA COUNTY DOMESTIC RELATIONS P.O. BOX 380 BLOOMSBURG, PA 17815 GOLUMBIA COUNTY TAX CLAIM BUREAU P.O. BOX 380 BLOOMSBURG, PA 17815 BLOOMSBURG, PA 17815 DEPARTMENT OF PUBLIC ASSISTANCE 27 E. 7TH-STREET, P.O. BOX 628 BLOOMSBURG, PA 17815-9974 TENANTS/OCCUPANTS 2015 NORTH MARKET STREET BERWICK, PA 18603 119 WALNUT DRIVE BERWICK, PA 18603	Fee Charge if Registered Charge in the Charge in th	Value Sender Value	S4 10481	- H	" " " ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '
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Total Number of Pieces Total Number of Pieces Postmaster, Per (Name of receiving Listed by Sender Received at Post Office	пд етріоуве)	The full declaration of value is required on all domestic and international registered mail. The maximum Indemnity payable for the reconstruction of nonnegotable documents under Express Mail document reconstruction insurance is \$500 per place subject or additional limitations for multiple, pieces lost or damages in a single catastrophic occurence. The maximum indemnity payable	nd international registered mail. The miss bifail document reconstruction insure in a single catastrophic occurrence.	naximum Indemirance is \$500 p	nnity payable per plece su n indemnity	e for the ribject to payable
	on Express M \$5,000 to sort Manuel 1990. In ord 1990. In ord 1990. In ord 1990. In ord 1990.	on Express Mall merchandise insurance is \$500, but optional Express Mail Service merchandise insurance is available for up to \$50,000 to some, but not all countries. The maximum indemnity payable is \$25,000 to registered mail. See Domestic Mail Manual R906, \$913, and \$921 for limitations of coverage on insurance and C00 mail. See in International Matural Manual Initiations of coverage on insurance and C00 mail. See informational mail. Snecial handling charges aboly only to Standard Mail 1A and Standard Mail 1A and Standard Mail 1A hand Standard	ional Express Mail Service merchandis indemnity payable is \$25,000 for reg s on insured and COD mail. See <i>Intern</i> es sooly only to Standard Mail (A) and	lise insurance is gistered mall. Sinational Mall Me	s available f See <i>Domes</i> 'anual for lim I (R) namals	or up to the Mail

June 11, 2002

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

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

OWNER(S): LAWRENCE W. COPE and SUSAN R. COPE

PLAINTIFF/SELLER: CONSECO FINANCE SERVICING CORP.

DEFENDANT(S): LAWRENCE W. COPE and SUSAN R. COPE

PROPERTY: 2015 NORTH MARKET STREET

BERWICK, PA 18603

COLUMBIA C.C.P. NO. 2001-CV-1115

The above captioned property is scheduled to be sold at Sheriff's Sale on <u>August 7 2002</u> at 9:00 a.m., in the Office of the Sheriff, Columbia County Courthouse, Bloomsburg, PA 17815. You may hold a judgment on the property, which may be extinguished by the sale. You may wish to attend the Sheriff's Sale to protect your interest.

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.

Gregory Javardian, Esquire Law Offices of Gregory Javardian

1310 Industrial Boulevard

1st Floor, Suite 101

Southampton, PA 18966

(215) 942-9690

Poskhaster 12 On 1601	Date 05/20/02
Postplaster 14/8603 City, State, ZIP Code	the transfer of the same

#### Request for Change of Address or Boxholder Information Needed for Service of Legal Process

Line and the Shome VIII					
Name: Carrence W. f. Sugan R. Cape					
Address: Street Street Street NOTE: The name and tast known address are required for change of address information. The name, if known, and post office box address are required for boxholder information.					
The following information is provided in accordance with 39 CFR 265.6(d)(6)(ii). There is no fee for providing boxholder information. The fee for providing change of address information is waived in accordance with 39 CFR 265.6(d)(1) and (2) and corresponding Administrative Support Manual 352.44a and b.					
1. Capacity of requester (e.g., process server, attorney, party representing himself):					
<ol> <li>Statute or regulation that empowers me to serve process (not required when requester is an attorney or a party acting pro-se - except a corporation acting pro-se must cite statule):</li> </ol>					
3. The names of all known parties to the litigation:					
4. The court in which the case has been or will be heard:					
5. The docket or other identifying number if one has been Issued:					
6. The capacity in which this individual is to be served (e.g. defendant or witness):					
WARNING					
THE SUBMISSION OF FALSE INFORMATION TO OBTAIN AND USE CHANGE OF ADDRESS INFORMATION OR BOXHOLDER INFORMATION FOR ANY PURPOSE OTHER THAN THE SERVICE OF LEGAL PROCESS IN CONNECTION WITH ACTUAL OR PROSPECTIVE LITIGATION COULD RESULT IN CRIMINAL PENALTIES INCLUDING A FINE OF UP TO \$10,000 OR IMPRISONMENT OR (2) TO AVOID PAYMENT OF THE FEE FOR CHANGE OF ADDRESS INFORMATION OF NOT MORE THAN 5 YEARS, OR BOTH (TITLE 18 U.S.C. SECTION 1001).					
I certify that the above information is the and that the address information is needed and will be used solely for service of legal process in connection with actual or prospective litigation.					
Sintature of the Midness Of OB 17515					
Printed Name City, State, ZIP Code					
FOR POST OFFICE USE ONLY					
No change of address order on file. NEW ADDRESS or BOXHOLDER'S POSTMARK  Not known at address given. NAME and STREET ADDRESS  Moved, left no forwarding address.  No such address.					

# **COLUMBIA COUNTY SHERIFF'S OFFICE**

PROCESS SERVICE ORDER OFFICER: T. CHAMBERLAIN SERVICE# 6 - OF - 14 SERVICES DATE RECEIVED 5/16/2002 DOCKET # 59ED2002 PLAINTIFF CONSECO FINANCE SERVICING CORP. DEFENDANT LAWRENCE W. COPE SUSAN R. COPE PERSON/CORP TO SERVED PAPERS TO SERVED TENANT(S) WRIT OF EXECUTION - MORTGAGE 2015 NORTH MARKET ST. FORECLOSURE BERWICK SERVED UPON \_\_\_\_ RELATIONSHIP \_\_\_\_\_ IDENTIFICATION \_\_\_\_ DATE \_\_\_\_\_ TIME \_\_\_\_ MILEAGE \_\_\_\_ OTHER \_\_\_\_ Race \_\_\_ Sex \_\_\_ Height \_\_\_ Weight \_\_\_ Eyes \_\_\_ Hair \_\_\_ Age \_\_\_ Military \_\_\_\_

TYPE OF SERVICE: A. PERSONAL SERVICE AT POA \_\_\_ POB \_\_\_ POE \_\_\_ CCSO \_\_\_ B. HOUSEHOLD MEMBER: 18+ YEARS OF AGE AT POA

C. CORPORATION MANAGING AGENT

D. REGISTERED AGENT

**ATTEMPTS** 

E. NOT FOUND AT PLACE OF ATTEMPTED SERVICE

F. OTHER (SPECIFY)

DATE	TIME	OFFICER	REMARKS
	·		
<del></del>			
DEPUTY		I	DATE

#### HARRY A. ROADARMEL, JR.



PHONE (570) 389-5627 24 HOUR FHONE (570) 784-6300

Monday, May 20, 2002

TENANT(S) 2015 NORTH MARKET ST. BERWICK, PA 18603-

CONSECO FINANCE SERVICING CORP. VS LAWRENCE W. COPE SUSAN R. COPE

**DOCKET** # 59ED2002

JD # 1115JD2001

Dear Sir:

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

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

Respectfully,

Harry A. Roadarmel, Jr. Sheriff of Columbia County

Harry a. Roadannel Jo

LAW OFFICES OF GREGORY JAVARDIAN By: GREGORY JAVARDIAN, ESQUIRE IDENTIFICATION NO. 55669 1310 INDUSTRIAL BOULEVARD 1ST FLOOR, SUITE 101 SOUTHAMPTON, PA 18966 (215) 942-9690

CONSECO FINANCE SERVICING CORP.

COURT OF COMMON PLEAS

VS.

**COLUMBIA COUNTY** 

LAWRENCE W. COPE SUSAN R. COPE No.: 2001-CV-1115 2002-ED-59

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

TO:

LAWRENCE W. COPE

SUSAN R. COPE 119 WALNUT DRIVE BERWICK, PA 18603

Your house (real estate) at 2015 NORTH MARKET STREET, BERWICK, PA 18603, is scheduled to be sold at Sheriff's Sale on August 7,2002 at 7,200 AM, in the Office of the Sheriff, Columbia County Courthouse, Bloomsburg, PA 17815, to enforce the court judgment of \$133,821.14, obtained by CONSECO FINANCE SERVICING CORP., against you.

#### 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 cancelled if you pay to the mortgagee the back payments, late charges, costs and reasonable attorney's fees due. To find out how much you must pay, you may call: (215) 942-9690.
- 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.

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 on page two 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 (215) 942-9690.
- 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 Gregory Javardian, Esquire at (215) 942-9690.
- 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 the 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. 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.
- 7. You may also have other rights and defenses, or ways of getting your home 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 E. 5<sup>TH</sup> STREET BLOOMSBURG, PA 17815 TELEPHONE: (570) 784-8760 ALL THAT CERTAIN piece or parcel of land, situate, lying and being in Berwick Borough, Columbia County, Pennsylvania, bounded and described as follows:

BEGINNING at a point on the southerly side of Market Street, at the corner of Lot #133; thence along Market Street in a westerly direction a distance of 45 feet to the corner of Lot #131; thence along said Lot in a southerly direction a distance of 120 feet to a 15 foot alley; thence along said alley in an easterly direction a distance of 45 feet to the corner of Lot #133; thence along said Lot in a southerly direction a distance of 120 feet to the place of beginning. Being Lot #132, Section Five, in the Park Real Estate Company Addition.

BEING known as 2015 North Market Street, Berwick, PA 18603.

Parcel No. 04B-01-009.

BEING THE SAME PREMISES which Susan R. Welsh, now by remarriage known as Susan R. Cope, by Indenture dated January 22, 2000 and recorded January 28, 2000 in the Office of the Recorder of Deeds for Columbia County, Pennsylvania, at Instrument #200000878, granted and conveyed unto Susan R. Cope and Lawrence W. Cope, wife and husband.

IMPROVEMENTS: RESIDENTIAL DWELLING.

SUBJECT TO MORTGAGE.

Functi	- WAU	Mailing Addre	ss History	TTEMPLE O	5/20/02 10:16
MEMBER ID: BEGIN DATE		WELLIVER			
	285 E BROAD ST NANTICOKE	PA	Zig. 18634-2	310-85	US
City: Verified:	DFCN Date Upda Y Date Verifi	ied: 09:06:01	Worker-ID: 192 Verif,Source: WF	01	
BEGIN DATE: Care Of Address:	08/06/01 End Date	09/05/01			
City:	21 RIVERSIDE ESTS PORT TREVORTON WRKR Date Ued:		<mark>Zip: 17864-9</mark> Worker-ID: <b>19:</b> Verr Source: PO	201	US
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HARRY A. ROADARMEL, JR.



SHERIFF OF COLUMBIA COUNTY COURT HOUSE - F.O. BOX 386 BLOOMSBURG, PA 17815

24 HOUE PHONE (\$7P) 784-630G

Monday, May 20, 2002

PHONE

(\$76: \$89.46.22

BERWICK SEWER AUTHORITY 344 MARKET ST. **BERWICK, PA 18603-**

CONSECO FINANCE SERVICING CORP. VS LAWRENCE W. COPE SUSAN R. COPE

**DOCKET #** 59ED2002

JD# 1115JD2001

Dear Sir:

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 that you may have.

Respectfully,

Harry a. Roadamed Jo Harry A. Roadarmel, Jr. Sheriff of Columbia County

Sewer Brance \$120.00 the Lycel Head

MAY-20-2002 17:1

P.02

#### HARRY A. ROADARMEL, JR.



59-02

PHONE (570) 389-3622

#### 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 5-14-02 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 LEINS LIST (\$1350,00 1 KMP 10464 CHECK FOR \$1200.00 \* 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 HOST POST ALL DATES ON CALANDER \* 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

\* DOCKET ALL DATES

### **COLUMBIA COUNTY SHERIFF'S OFFICE** PROCESS SERVICE ORDER

OFFICER: LUZERNE DATE RECEIVED 5/16/2002 PLAINTIFF DEFENDANT SUSAN R. COPE

SERVICE# 2 - OF - 14 SERVICES

DOCKET # 59ED2002

CONSECO FINANCE SERVICING CORP.

LAWRENCE W. COPE

PERSON/CORP TO	SER	VED		PAPE	RS TO S	ERVED	
SUSAN COPE				WRIT	OF EXE	CUTION -	MORTGAGE
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BERWICK							
SERVED UPON _	····				*		
RELATIONSHIP				IDI	ENTIFICA	ATION	
DATE	ГІМЕ	<del></del>	MILEA	AGE _		OTHER	
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TYPE OF SERVICE	B. C. D. E.	HOUSEHOL CORPORAT REGISTERE NOT FOUN	D MENTION MED AGE	MBER: IANAG ENT LACE (	18+ YEA ING AGE OF ATTE	RS OF AG NT MPTED SE	E AT POA
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DEPUTY			•••		DATE _		

### **COLUMBIA COUNTY SHERIFF'S OFFICE** PROCESS SERVICE ORDER

OFFICER: LUZERNE DATE RECEIVED 5/16/2002 PLAINTIFF

SERVICE# 1 - OF - 14 SERVICES

DOCKET # 59ED2002

CONSECO FINANCE SERVICING CORP.

DEFENDANT

LAWRENCE W, COPE SUSAN R. COPE

PERSON/CORP TO S	ERVED	PAPERS 7	TO SERVED			
LAWRENCE COPE		WRIT OF EXECUTION - MORTGAGE FORECLOSURE				
119 WALNUT DRIVE	FORECLO					
BERWICK						
SERVED UPON						
RELATIONSHIP		IDENT	IDENTIFICATION			
DATETIN	иЕ	MILEAGE	OTHER			
Race Sex H	eight We	eight Eyes H	air Age	Military		
TYPE OF SERVICE:	B. HOUSEH C. CORPOR. D. REGISTE E. NOT FOU	OLD MEMBER: 18+ ATION MANAGING	YEARS OF AG AGENT ATTEMPTED SE	E AT POA		
ATTEMPTS DATE	TIME	OFFICER		RKS		
		DA				

# COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN SERVICE# 8 - OF - 14 SERVICES DATE RECEIVED 5/16/2002 DOCKET # 59ED2002 PLAINTIFF CONSECO FINANCE SERVICING CORP. DEFENDANT LAWRENCE W. COPE SUSAN R. COPE PERSON/CORP TO SERVED PAPERS TO SERVED CONNIE GINGHER - TAX COLLECTOR WRIT OF EXECUTION - MORTGAGE 1615 LINCOLN AVE. FORECLOSURE BERWICK SERVED UPON \_\_\_\_\_ IDENTIFICATION \_\_\_\_\_ TIME //// MILEAGE \_\_\_\_\_OTHER \_\_\_\_ Race \_\_\_ Sex \_\_\_ Height \_\_\_ Weight \_\_ Eyes \_\_ Hair \_\_\_ Age \_\_ Military TYPE OF SERVICE: A. PERSONAL SERVICE AT POA \_\_\_ POB \( \subseteq \) POE \_\_\_ CCSO \_\_\_ B. HOUSEHOLD MEMBER: 18+ YEARS OF AGE AT POA C. CORPORATION MANAGING AGENT D. REGISTERED AGENT E. NOT FOUND AT PLACE OF ATTEMPTED SERVICE F. OTHER (SPECIFY) ATTEMPTS DATE TIME OFFICER REMARKS

**DEPUTY** 

# COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

SERVICE# 7 - OF - 14 SERVICES

OFFICER: T. CHAMBERLAIN

DATE RECEIVED 5/16/2002 DOCKET # 59ED2002 PLAINTIFF CONSECO FINANCE SERVICING CORP DEFENDANT LAWRENCE W. COPE SUSAN R. COPE PERSON/CORP TO SERVED PAPERS TO SERVED BERWICK SEWER AUTHORITY WRIT OF EXECUTION - MORTGAGE FORECLOSURE 344 MARKET ST. BERWICK SERVED UPON (2)(0) IDENTIFICATION RELATIONSHIP DATE CS/3462 TIME 1055 MILEAGE \_\_\_\_\_ OTHER \_\_\_\_ Race \_\_ Sex \_\_ Height \_\_ Weight \_\_ Eyes \_\_ Hair \_\_ Age \_\_ Military \_\_\_ TYPE OF SERVICE: A. PERSONAL SERVICE AT POA \_\_\_ POB \_\_\_ CCSO \_\_\_ B. HOUSEHOLD MEMBER: 18+ YEARS OF AGE AT POA C. CORPORATION MANAGING AGENT D. REGISTERED AGENT E. NOT FOUND AT PLACE OF ATTEMPTED SERVICE F. OTHER (SPECIFY) ATTEMPTS DATE TIME OFFICER REMARKS DEPUTY

## COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN SERVICE# 5 - OF - 14 SERVICES DATE RECEIVED 5/16/2002 DOCKET # 59ED2002 CONSECO FINANCE SERVICING CORP. PLAINTIFF DEFENDANT LAWRENCE W. COPE SUSAN R. COPE PERSON/CORP TO SERVED PAPERS TO SERVED WRIT OF EXECUTION - MORTGAGE DEPT. OF PUBLIC ASSISTANCE **FORECLOSURE** 27 E 7TH ST., PO BOX 628 BLOOMSBURG SERVED UPON \_\_\_\_ IDENTIFICATION RELATIONSHIP DATE OS JOS MILEAGE \_\_\_\_\_ OTHER \_\_\_\_ Race \_\_\_ Sex \_\_\_ Height \_\_\_ Weight \_\_\_ Eyes \_\_\_ Hair \_\_\_ Age \_\_\_ Military \_\_\_\_ TYPE OF SERVICE: A, PERSONAL SERVICE AT POA POB / POE CCSO B. HOUSEHOLD MEMBER: 18+ YEARS OF AGE AT POA C. CORPORATION MANAGING AGENT D. REGISTERED AGENT E. NOT FOUND AT PLACE OF ATTEMPTED SERVICE F. OTHER (SPECIFY) ATTEMPTS TIME OFFICER REMARKS DATE

DEPUTY

# COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

SERVICE# 9 - OF - 14 SERVICES

OFFICER:

DATE RECEIVED 5.	/16/2002	DOCKET # 59EI	D2002		
PLAINTIFF	CONSECO FIN	CONSECO FINANCE SERVICING CORP.			
DEFENDANT		AWRENCE W. COPE SUSAN R. COPE			
PERSON/CORP TO S	SERVED	PAPERS TO SE	RVED		
DOMESTIC RELATIO		WRIT OF EXECUTION - MORTGAGE FORECLOSURE			
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BLOOMSBURG					
SERVED UPON	estie Cellan				
RELATIONSHIP	Horse Ser ME 10/6 MILES	IDENTIFICA	TION		
DATE (25/26/22) TIM	ME <u>1016</u> MILEA	AGE	OTHER		
			Age Military		
TYPE OF SERVICE:	A. PERSONAL SERVI B. HOUSEHOLD MEN C. CORPORATION M D. REGISTERED AGE E. NOT FOUND AT P  F. OTHER (SPECIFY)	MBER: 18+ YEAI ANAGING AGEN ENT LACE OF ATTEN	NT		
ATTEMPTS DATE	TIME OF	FICER	REMARKS		
DEPUTY	Millar	DATE	05/20/02		

# COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

SERVICE# 12 - OF - 14 SERVICES

OFFICER:

DATE RECEIVED 5	/16/2002	DOCKET#:	DOCKET # 59ED2002			
PLAINTIFF	CONSEC	CONSECO FINANCE SERVICING CORP.				
DEFENDANT		LAWRENCE W. COPE SUSAN R. COPE				
PERSON/CORP TO	SERVED	PAPERS TO	PAPERS TO SERVED WRIT OF EXECUTION - MORTGAGE			
COLUMBIA COUNT	Y TAX CLAIM	WRIT OF EX				
PO BOX 380		FORECLOS	URE			
BLOOMSBURG						
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2.   Restricted Delivery  Consult postmaster for fee.	Number	70011940000139918461	iype ed ⊠ Certified		Petum Receipt for Merchandise COD Date of Delivery	e's Address (Only if requested s paid)		Domestic Return Receipt	completed on the reverse side?	OFFICE OF F.A.I.R.	a does not a number, d the date  4a, Article No 700119  4b, Service 1	40000139918430 Гуре
tow the article number. delivered and the date	4a. Article N	700119	40. Service Type		7. Date of Delivery	8. Addressee's and fee is p	·	02595-97-B-0179	ADDRESS	PO BOX 8016 HARRISBURG, PA 17105	☐ Registers ☐ Express I ☐ Return Rec 7. Date of De	Mail Insured ceipt for Merchandise COD
ow the artic			610					<b>9</b>	RETURN	5. Received By: (Print Name)	8. Addressee and fee is	s's Address (Only if requested paid)
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2.  Restricted Delivery Consult postmaster for fee.		0011940000139918478	<b>≱⊠</b>		Return Receipt for Merchandise COD Sate of Delivery	s Address (Only if requested aid)	:	Domestic Return Receipt	Is your RETURN A	6. Signature: (Address be or Agent)  X Dull Duy Du		s's Address (Only if requested
	4a, Article Number	P I	4b. Service Type		☐ Return Receipt for 7. Date of Delivery	8. Addressee's Adams and fee is paid)	· · ·	102595-97-B-0179	reverse side	SENDER:  Complete items 1 and 2 for additional services.  Complete items 3, 4:	does not	I also wish to receive the folk ) services (for an extra .ae): 59 ()2  1. **Ex Addressee's Address
ما الاولان هائي. ما Anow the article number. مع was delivered and the date.			nion Bank and Arrust   60	n City, NV 19906		Received By: (Print Name)	Signerre: (Addressee or Agent)	PS Form 3811, December 1994	Is your RETURN ADDRESS completed on the	6. Signatur (Addressed or Agint) Venturo	7001194	2. Restricted Delivery Consult postmaster for fee.  0000139918454  ** Certified

#### WEDNESDAY AUGUST 7, 2002 AT 9:00 AM

BY VIRTUE OF A WRIT OF EXECUTION NO. 59 OF 2002 ED AND CIVIL WRIT NO. 1115 OF 2001 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 BIDDER, FOR CASH, IN A COURTROOM OR SHERIFF' OFFICE, TO BE ANNOUNCED, AT THE COLUMBIA COUNTY COURTHOUSE, BLOOMSBURG, PENNA., 17815, ALL THE RIGHT AND TITLE AND INTEREST TO THE DEFENDANTS IN AND TO:

ALL THAT CERTAIN piece or parcel of land, situate, lying and being in Berwick Borough, Columbia County, Pennsylvania, bounded and described as follows:

BEGINNING at a point on the southerly side of Market Street, at the corner of Lot #133; thence along Market Street in a westerly direction a distance of 45 feet to the corner of Lot #131; thence along said Lot in a southerly direction a distance of 120 feet to a 15 foot alley; thence along said alley in an easterly direction a distance of 45 feet to the corner of Lot #133; thence along said Lot in a southerly direction a distance of 120 feet to the place of beginning. Being Lot #132, Section Five, in the Park Real Estate Company Addition. BEING known as 2015 North Market Street, Berwick, PA 18603.

Parcel No. 04B-01-009.

BEING THE SAME PREMISES which Susan R. Welsh, now by remarriage known as Susan R. Cope, by Indenture dated January 22, 2000 and recorded January 28, 2000 in the Office of the Recorder of Deeds for Columbia County, Pennsylvania, at Instrument #200000878, granted and conveyed unto Susan R. Cope and Lawrence W. Cope, wife and husband.

IMPROVEMENTS: RESIDENTIAL DWELLING.

SUBJECT TO MORTGAGE.

#### TERMS OF SALE

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Plaintiff's Attorney
Gregory Javardian
Harry A. Roadarmel, Jr.

www.sheriffofcolumbiacounty.com

LAW OFFICES OF GREGORY JAVARDIAN By: GREGORY JAVARDIAN, ESQUIRE IDENTIFICATION NO. 55669 1310 INDUSTRIAL BOULEVARD IST FLOOR, SUITE 101 SOUTHAMPTON, PA 18966 (215) 942-9690

CONSECO FINANCE SERVICING CORP.

COURT OF COMMON PLEAS

VS.

**COLUMBIA COUNTY** 

LAWRENCE W. COPE SUSAN R. COPE No.: 2001-CV-1115 2002-ED-59

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

TO: LAWRENCE W. COPE SUSAN R. COPE 119 WALNUT DRIVE BERWICK, PA 18603

Your house (real estate) at 2015 NORTH MARKET STREET, BERWICK, PA 18603, is scheduled to be sold at Sheriff's Sale on Action 7, 2002 at 9,00 Am, in the Office of the Sheriff, Columbia County Courthouse, Bloomsburg, PA 17815, to enforce the court judgment of \$133,821.14, obtained by CONSECO FINANCE SERVICING CORP., against you.

#### 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:

- I. The sale will be cancelled if you pay to the mortgagee the back payments, late charges, costs and reasonable attorney's fees due. To find out how much you must pay, you may call: (215) 942-9690.
- 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.

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 on page two 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 (215) 942-9690.
- 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 Gregory Javardian, Esquire at (215) 942-9690.
- 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 the 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. 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.
- 7. You may also have other rights and defenses, or ways of getting your home 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 E. 5<sup>TH</sup> STREET BLOOMSBURG, PA 17815 TELEPHONE: (570) 784-8760

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

CONSECO FINANCE SERVICING CORP.	IN THE COURT OF COMMON PLEAS OF COLUMBIA COUNTY, PENNSYLVANIA		
VS.	No.: 2001-CV-1115 2002 - ED - 59		
LAWRENCE W. COPE SUSAN R. COPE	WRIT OF EXECUTION (MORTGAGE FORECLOSURE)		
Commonwealth of Pennsylvania:			
County of Columbia:			
TO THE SHERIFF OF COLUMBIA COUNTY,	PENNSYLVANIA:		
To satisfy the judgment, interest and costs in the following described property (specifically described Premises: 2015 NORTH MARKET STREET, BERY			
(See legal description attached.)			
Amount Due	\$ <u>133,821.14</u>		
Interest from 4/8/02 to Date of Sale (\$21.99 per diem)	<b>\$</b>		
Total	\$ Plus Cost \$		
Dated 5 16 3 NO	Prothonotary, Common Pleas Court of Columbia County, Pennsylvania		

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COURT OF COMMON PLEAS CONSECO FINANCE SERVICING CORP.

**COLUMBIA COUNTY** VS.

LAWRENCE W. COPE

2002-ED 59 SUSAN R. COPE

#### **AFFIDAVIT PURSUANT TO RULE 3129.1**

Plaintiff in the above 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 2015 NORTH MARKET STREET, BERWICK, PA 18603:

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

Last Known Address (if address cannot be Name

reasonably ascertained, please indicate)

119 WALNUT DRIVE LAWRENCE W. COPE

BERWICK, PA 18603

No.: 2001-CV-1115

SUSAN R. COPE 119 WALNUT DRIVE

BERWICK, PA 18603

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

119 WALNUT DRIVE LAWRENCE W. COPE

BERWICK, PA 18603

119 WALNUT DRIVE SUSAN R. COPE

BERWICK, PA 18603

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

Last Known Address (if address cannot be Name

reasonably ascertained, please indicate)

None.

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

Last Known Address (if address cannot be Name

reasonably ascertained, please indicate)

Plaintiff.

117 E. College Parkway Irwin Union Bank and Trust

Carson City, NV 89706

332 Minnesota Street, Suite 610 Greentree Consumer Discount Company

St. Paul, MN 55101

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 indicate)

None.

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

Name Last Known Address (if address cannot be

reasonably ascertained, please indicate)

Columbia County Domestic Relations P.O. Box 380

Bloomsburg, PA 17815

Columbia County Tax Claim Bureau P.O. Box 380

Bloomsburg, PA 17815

Dept. of Public Assistance 27 E. 7<sup>th</sup> Street, P.O. Box 628

Bloomsburg, PA 17815-9974

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

Name Last Known Address (if address cannot be

reasonably ascertained, please indicate)

Tenants/Occupants 2015 NORTH MARKET STREET

BERWICK, PA 18603

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

GREGORY JAVARDIAN, ESQUIRE

Attorney for Plaintiff

May 10, 2002

CONSECO FINANCE SERVICING CORP.

COURT OF COMMON PLEAS

vs.

COLUMBIA COUNTY

LAWRENCE W. COPE SUSAN R. COPE No.: 2001-CV-1115 2002-ED-59

#### **AFFIDAVIT PURSUANT TO RULE 3129.1**

Plaintiff in the above 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 <u>2015 NORTH MARKET STREET</u>, BERWICK, PA <u>18603</u>:

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

Name

Last Known Address (if address cannot be reasonably ascertained, please indicate)

LAWRENCE W. COPE

119 WALNUT DRIVE BERWICK, PA 18603

SUSAN R. COPE

119 WALNUT DRIVE BERWICK, PA 18603

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

LAWRENCE W. COPE

119 WALNUT DRIVE BERWICK, PA 18603

SUSAN R. COPE

119 WALNUT DRIVE BERWICK, PA 18603

3. Name and last known 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 indicate)

None.

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

Name

Last Known Address (if address cannot be reasonably ascertained, please indicate)

Plaintiff.

Irwin Union Bank and Trust

117 E. College Parkway Carson City, NV 89706

Greentree Consumer Discount Company

332 Minnesota Street, Suite 610

St. Paul, MN 55101

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 indicate)

None.

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

Name

Last Known Address (if address cannot be reasonably ascertained, please indicate)

Columbia County Domestic Relations

P.O. Box 380

Bloomsburg, PA 17815

Columbia County Tax Claim Bureau

P.O. Box 380

Bloomsburg, PA 17815

Dept. of Public Assistance

27 E. 7<sup>th</sup> Street, P.O. Box 628 Bloomsburg, PA 17815-9974

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

Name

Last Known Address (if address cannot be reasonably ascertained, please indicate)

Tenants/Occupants

2015 NORTH MARKET STREET

BERWICK, PA 18603

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

GREGORY JAVARDIAN, ESQUIRE

Attorney for Plaintiff

May 10, 2002

LAW OFFICES OF GREGORY JAVARDIAN By: GREGORY JAVARDIAN, ESQUIRE **IDENTIFICATION NO. 55669** 1310 INDUSTRIAL BOULEVARD 1ST FLOOR, SUITE 101 SOUTHAMPTON, PA 18966 (215) 942-9690

CONSECO FINANCE SERVICING

COURT OF COMMON PLEAS

CORP.

**COLUMBIA COUNTY** 

VS.

LAWRENCE W. COPE SUSAN R. COPE

No.: 2001-CV-1115 2002-ED-59

#### CERTIFICATION TO SHERIFF OF COLUMBIA COUNTY AS TO THE SALE OF REAL ESTATE

I hereby certify that I am the attorney for the Plaintiff in this Mortgage Foreclosure Action and further certify this Property is:

- **FHA** ()
- Tenant Occupied ()
- () Vacant
- Commercial ()
- () As a result of Complaint in Assumpsit
- (X) Act 91 complied with

GREGORY/JAVARDIAN, ESQUIRE

Attorney for Plaintiff

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EGORY/JAVARDIAN, ESQUIRE

ttornev for Plaintiff

CONSECO FINANCE SERVICING CORP.

#### IN THE COURT OF COMMON PLEAS OF COLUMBIA COUNTY

Plaintiff'

CIVIL ACTION - LAW

VS.

IN MORTGAGE FORECLOSURE

LAWRENCE W. COPE SUSAN R. COPE

No.: 2001-CV-1115 2002-ED-59

Defendant(s)

#### AFFIDAVIT OF NON-MILITARY SERVICE AND **CERTIFICATION OF LAST KNOWN ADDRESS** OF DEFENDANTS AND PLAINTIFF

COMMONWEALTH OF PENNSYLVANIA

SS

COUNTY OF BUCKS

The undersigned, being duly sworn according to law, deposes and says this affidavit is made on behalf of the above plaintiff, being authorized to do so, and it is averred that:

- (a) LAWRENCE W. COPE is over 21 years of age, resides at 119 WALNUT DRIVE, BERWICK, PA 18603;
- (b) SUSAN R. COPE is over 21 years of age, resides at resides at 119 WALNUT DRIVE, BERWICK, PA 18603:
- (c) Plaintiff. CONSECO FINANCE SERVICING CORP., is an institution conducing business under the Laws of the Commonwealth of Pennsylvania with an address of 7360 SO. KYRENE ROAD, TEMPE, AZ 85282

Deponent further avers that none of the above is within the protection of the Soldiers' and Sailors' Civil Relief Act of 1940, together with the amendments thereto.

> GREGORY JAVARDIAN, ESQUIRE Aftorney for Plaintiff

Sworn to and subscribed before me

unday of 2002.

**Notary Public** 

NOTAFIAL SEAL TINA E POYLE. Notary Public City of Prsiadogilia, Phila. County My Commission Expires Nov. 29, 2004

#### SHERIFF'S RETURN OF SERVICE **COLUMBIA COUNTY**

PLAINTIFF CONSECO FINANCE SERVICING CORP.	COURT NO.: 2001-CV	<u>-1115</u>
DEFENDANT	TYPE OF ACTION	
LAWRENCE W. COPE SUSAN R. COPE	XX Notice of Sheriff's Sa	ale
SERVE AT: 2015 NORTH MARKET STREET BERWICK, PA_18603	SALE DATE:	
PLEASE POST SHERIFF'S HAND BILL.	SERVED	
Served and made known to		ne day of, Commonwealth of
Defendant personally served Adult family member with whom Defendant Relationship is	dant(s) reside(s).	
Adult in charge of Defendant's residence Manager/Clerk of place of lodging in what Agent or person in charge of Defendant' an officer of said D	hich Defendant(s) reside(s). 's office or usual place of busine befendant's company.	SS.
Other: Description: Age Height	Weight Race	Sex Other
	SHERIFF	Deputy Sheriff
On the day of, 2002, a Moved Unknown No An Other:	swer Vacant	nt NOT FOUND because:
	SHERIFF By:	Deputy Sheriff
DEP	UTIZED SERVICE	
Now, this day of deputize the Sheriff of thereof and according to law.	2002, I, Sheriff of Columbia Conty to serve this Notice of Sherif	ounty, Pennsylvania, do hereby I's Sale and make return
	SHERIFF By:	Deputy Sheriff
ATTORNEY FOR PLAINTIFF GREGORY JAVARDIAN, ESQUIRE 1.D.#55669 1310 Industrial Boulevard		

1st Floor, Suite 101 Southampton, PA 18966 (215) 942-9690

#### SHERIFF'S RETURN OF SERVICE **COLUMBIA COUNTY**

PLAINTIFF CONSECO FINANCE SERVICING CORP.	COURT NO.: <u>2001-CV-1</u>	<u>115</u>		
DEFENDANT	TYPE OF ACTION	<u>NC</u>		
LAWRENCE W. COPE SUSAN R. COPE	XX Notice of Sheriff's Sale	е		
SERVE AT: 119 WALNUT DRIVE BERWICK, PA 18603	SALE DATE:			
PLEASE DEPUTIZE <u>LUZERNE COUN</u> SHERIFF'S SALE.	TY TO SERVE DEFENDANTS W	TTH NOTICE OF		
	<u>SERVED</u>			
Served and made known to	ow:	day of, , Commonwealth of		
Adult family member with whom Defe Relationship is	nce who refused to give name or relawhich Defendant(s) reside(s).  Int's office or usual place of business			
an officer of said Other:	Defendant's company.			
Other: Height	Weight Race S	Sex Other		
	SHERIFF By:	Deputy Sheriff		
On the day of, 2002	2, at o'clock M., Defendant	NOT FOUND because:		
Moved Unknown No A	Answer Vacant			
	SHERIFF By:	Deputy Sheriff		
DE	EPUTIZED SERVICE			
Now, this day of deputize the Sheriff of Luzerne County to according to law.		nty, Pennsylvania, do hereby and make return thereof and		
	SHERIFF			
ATTORNEY FOR PLAINTIFF GREGORY JAVARDIAN, ESQUIRE	Ву:	Deputy Sheriff		
GREGORY JAVARDIAN, ESQUIRE 1.D.#55669 1310 Industrial Boulevard				

1st Floor, Suite 10! Southampton, PA 18966 (215) 942-9690

#### WAIVER OF WATCHMAN

Any deputy sheriff levying upon or attaching any property under within Writ may leave same without a watchman, in custody of whoever is found in possession, (after notifying such person of such levy or attachment,) without liability on the part of such Deputy or the Sheriff to any Plaintiff herein for any loss, destruction or removal of any such property before Sheriff's Sale thereof.

GREGORY JAVARDIAN, ESQ. ATTORNEY FOR PLAINTIFF 1310 INDUSTRIAL BOULEVARD 1<sup>ST</sup> FLOOR, SUITE 101 SOUTHAMPTON, PA 18966

BEGINNING at a point on the southerly side of Market Street, at the corner of Lot #133; thence along Market Street in a westerly direction a distance of 45 feet to the corner of Lot #131; thence along said Lot in a southerly direction a distance of 120 feet to a 15 foot alley; thence along said alley in an easterly direction a distance of 45 feet to the corner of Lot #133; thence along said Lot in a southerly direction a distance of 120 feet to the place of beginning. Being Lot #132, Section Five, in the Park Real Estate Company Addition.

BEING known as 2015 North Market Street, Berwick, PA 18603.

Parcel No. 04B-01-009.

BEING THE SAME PREMISES which Susan R. Welsh, now by remarriage known as Susan R. Cope, by Indenture dated January 22, 2000 and recorded January 28, 2000 in the Office of the Recorder of Deeds for Columbia County, Pennsylvania, at Instrument #200000878, granted and conveyed unto Susan R. Cope and Lawrence W. Cope, wife and husband.

IMPROVEMENTS: RESIDENTIAL DWELLING.

BEGINNING at a point on the southerly side of Market Street, at the corner of Lot #133; thence along Market Street in a westerly direction a distance of 45 feet to the corner of Lot #131; thence along said Lot in a southerly direction a distance of 120 feet to a 15 foot alley; thence along said alley in an easterly direction a distance of 45 feet to the corner of Lot #133; thence along said Lot in a southerly direction a distance of 120 feet to the place of beginning. Being Lot #132, Section Five, in the Park Real Estate Company Addition.

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### THE LAW Offices of

1310 Industrial Boulevard 1st Floor, Suite 101 Southampton, PA 18966

**GREGORY JAVARDIAN** 

Phone: (215) 942-9690 Fax: (215) 942-9695

May 10, 2002

Office of the Prothonotary Columbia County Courthouse 35 W. Main Street Bloomsburg, PA 17815

Re:

CONSECO FINANCE SERVICING CORP.

v. LAWRENCE W. COPE and SUSAN R. COPE

No. 2001-CV-1115

Premises: 2015 NORTH MARKET STREET, BERWICK, PA 18603

#### Dear Sir/Madam:

I would appreciate your issuing a Writ of Execution on the captioned property and transmitting the appropriate documents to the Sheriff so that it can be placed on the next available Sheriff's Sale.

Enclosed are the necessary documents, together with a check to your order in the amount of \$23.00 and a check to the order of the Sheriff in the amount of \$1,350.00 in payment of costs and fees. Kindly return a time-stamped copy of the Praecipe for Writ in the enclosed self-addressed stamped envelope.

Should you have any questions or need additional information, do not hesitate to contact me.

Very truly yours,

Marie Keen for

GREGORY JAVARDIAN

/mk

enclosures

CORETA OF COURTS OFFICE

EZ :01 A 61 YAN 5005

DINOMOTARY

MEMO PAY TO THE Sheriff ORDER OF THE LAW OFFICES OF GREGORY JAVARDIAN

ESCROW ACCOUNT

1310 INDUSTRIAL BLVD., SUITE 101

SOUTHAMPTON, PA 18966 CONSECO VS. COPE, LAWRENCE ## OBE & OBE & # 19 10 10 10 70 16037630 FIRSTRUST BANK 3-7380-2360 **\$**\*\*1,350.00 05/13/2002 10464 DOLLARS
Security Features Included. lacksquare