

COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN
DATE RECEIVED 8/1/2002

SERVICE# 2 - OF - 13 SERVICES
DOCKET # 97ED2002

PLAINTIFF JP MORTGAGE CHASE BANK F/K/A CHASE BANK OF TEXAS NATIONAL ASSOCIATION, AS CUSTODIAN

DEFENDANT JOSEPH PECORELLI
JULIE A. ROBINSON

PERSON/CORP TO SERVED	PAPERS TO SERVED
JULIE ROBINSON	WRIT OF EXECUTION - MORTGAGE
300 E 11TH ST.	FORECLOSURE
BERWICK	

SERVED UPON Julie

RELATIONSHIP DEF IDENTIFICATION _____

DATE 8-21-2 TIME 1705 MILEAGE 24 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 DATE	TIME	OFFICER	REMARKS
<u>8-19-2</u>	<u>1140</u>	<u>ARTER</u>	<u>Card</u>
<u>8-21-2</u>	<u>1100</u>	<u>ARTER</u>	

DEPUTY J. Carter DATE 8-21-2

COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN
DATE RECEIVED 8/1/2002

SERVICE# 5 - OF - 13 SERVICES
DOCKET # 97ED2002

PLAINTIFF JP MORTGAGE CHASE BANK F/K/A CHASE BANK OF TEXAS NATIONAL ASSOCIATION, AS CUSTODIAN

DEFENDANT JOSEPH PECORELLI
JULIE A. ROBINSON

PERSON/CORP TO SERVED
BERWICK SEWER AUTHORITY
344 MARKET ST.
BERWICK

PAPERS TO SERVED
WRIT OF EXECUTION - MORTGAGE FORECLOSURE

SERVED UPON Kelly Green

RELATIONSHIP wastewater clerk IDENTIFICATION _____

DATE 8-19-02 TIME 1155 MILEAGE 8- 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	DATE	TIME	OFFICER	REMARKS

DEPUTY J. Carter DATE 8-19-02

COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN
DATE RECEIVED 8/1/2002

SERVICE# 6 - OF - 13 SERVICES
DOCKET # 97ED2002

PLAINTIFF JP MORTGAGE CHASE BANK F/K/A CHASE BANK OF TEXAS NATIONAL ASSOCIATION, AS CUSTODIAN

DEFENDANT JOSEPH PECORELLI
JULIE A. ROBINSON

PERSON/CORP TO SERVED
CONNIE GINGHER - TAX COLLECTOR
1615 LINCOLN AVE.
BERWICK

PAPERS TO SERVED
WRIT OF EXECUTION - MORTGAGE FORECLOSURE

SERVED UPON CONNIE

RELATIONSHIP — IDENTIFICATION —

DATE 8-19-2 TIME 11:30 MILEAGE 8 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	DATE	TIME	OFFICER	REMARKS

DEPUTY J. Chamberlain DATE 8-19-2

COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER:
DATE RECEIVED 8/1/2002

SERVICE# 7 - OF - 13 SERVICES
DOCKET # 97ED2002

PLAINTIFF JP MORTGAGE CHASE BANK F/K/A CHASE BANK OF TEXAS NATIONAL ASSOCIATION, AS CUSTODIAN

DEFENDANT JOSEPH PECORELLI
JULIE A. ROBINSON

PERSON/CORP TO SERVED
DOMESTIC RELATIONS
15 PERRY AVE.
BLOOMSBURG

PAPERS TO SERVED
WRIT OF EXECUTION - MORTGAGE
FORECLOSURE

SERVED UPON Joseph Pecorelli Cust Srs.

RELATIONSHIP _____ IDENTIFICATION _____

DATE 8-15-2 TIME 1420 MILEAGE 3 - 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	DATE	TIME	OFFICER	REMARKS

DEPUTY J. Coyle DATE 8-15-2

COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER:
DATE RECEIVED 8/1/2002

SERVICE# 10 - OF - 13 SERVICES
DOCKET # 97ED2002

PLAINTIFF JP MORTGAGE CHASE BANK F/K/A CHASE BANK OF TEXAS NATIONAL ASSOCIATION, AS CUSTODIAN

DEFENDANT JOSEPH PECORELLI
JULIE A. ROBINSON

PERSON/CORP TO SERVED	PAPERS TO SERVED
COLUMBIA COUNTY TAX CLAIM	WRIT OF EXECUTION - MORTGAGE
PO BOX 380	FORECLOSURE
BLOOMSBURG	

SERVED UPON DENNIS LONG

RELATIONSHIP _____ IDENTIFICATION _____

DATE 8-14-2 TIME 1500 MILEAGE 3 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	DATE	TIME	OFFICER	REMARKS

DEPUTY [Signature] DATE 8-14-2

TAX NOTICE 2002 SCHOOL REAL ESTATE
 BERWICK BOROUGH
 MAKE CHECKS PAYABLE TO:
 CONNIE C. GINGHER
 1615 LINCOLN AVENUE
 BERWICK, PA 18603

FOR BERWICK AREA SCHOOL DISTRICT

DATE 07/01/2002

BILL# 003345

DESCRIPTION	ASSESSMENT	RATE	LESS DISC	AMOUNT FACE	INC PENALTY
REAL ESTATE	20799	31.400	640.03	653.09	718.40
<p>The 2% discount and 10% penalty have been computed for your convenience. Taxes are due now and payable. Prompt payment is requested. This tax notice must be returned with your payment. For a receipt, enclose a SASE.</p>					

HOURS MON, TUES, THURS, FRI 9:30am - 4pm DURING DISCT. CLOSED WED FRI AND HOLIDAY AFTER DISCT.
PHONE 570-752-7442

M ROBINSON JULIE A
A PECORELLI JOSEPH
I 608-OAK-STREET, 300 East 11th Street
L BERWICK PA 18603

SCHOOL PENALTY AT 10%

PROPERTY DESCRIPTION	ACCT.
PARCEL 04A09 22200000	4733
300 E 11TH ST	
20000-2033	
0.19 ACRES	
3300.00	
17499.00	
THIS TAX RETURNED TO COURT HOUSE: JANUARY 1, 2003	

Original

Tax Notice 2002 County & Municipality

BERWICK BORO
MAKE CHECKS PAYABLE TO:

Connie C Gingher
 1615 Lincoln Avenue
 Berwick PA 18603

HOURS: MON, TUE, THUR & FRI : 9:30AM - 4PM
 CLOSED WEDNESDAY & HOLIDAYS.
 CLOSED FRIDAY AFTER DISCOUNT
PHONE: 570-752-7442

TAXES ARE DUE & PAYABLE - PROMPT PAYMENT IS REQUESTED

ROBINSON JULIE A
 PECORELLI JOSEPH
 608-OAK-STREET 300 E 11th St
 BERWICK PA 18603

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

DESCRIPTION	ASSESSMENT	MILLS	LESS DISCOUNT	TAX AMOUNT DUE	INCL PENALTY
GENERAL	20799	4.846	98.77	100.79	110.87
SINKING		.845	17.23	17.58	19.34
LIGHT		1.05	21.40	21.84	22.93
FIRE		1.25	25.48	26.00	27.30
BORO RE		5.8	118.22	120.63	126.66
The discount & penalty have been calculated for your convenience					
PAY THIS AMOUNT			281.10	286.84	307.10
			April 30	June 30	June 30
			If paid on or before	If paid on or before	after

FOR: COLUMBIA COUNTY DATE 03/01/2002 BILL NO. 5540

CNTY	TWP
Discount 2%	2%
Penalty 10%	5%
PARCEL: 04A-09-222-00,000	5289
300 E 11TH ST	
.1894 Acres	Land 3,300
	Buildings 17,499
	Total Assessment 20,799

This tax returned to courthouse on: January 1, 2003

FILE COPY

Handwritten notes:
 This was paid
 4/30/02
 20-26

BERWICK DENTAL ARTS

105 W 9TH ST.

BERWICK, PA 18603

570-752-4542

FAX

TO:

Sheriff of Columbia County

PHONE 570-784-0257

FAX ↑

FROM:

Berwick Dental Arts

PHONE 570-752-4542

FAX 570-752-6806

COMMENTS:

Number of pages in this FAX 2 Including Cover Sheet

John E. DeFinnis DDS
Steven G. Bishop DDS



Bryan P. Carlin DDS
James C. DeFinnis DMD

Berwick Dental Arts, Inc.
105 W. Ninth Street, Berwick, PA 18603 - 752-4542

August 21, 2002

This is in reference to an upcoming sheriff sale, Docket #97ED2002.
The amount due Berwick Dental Arts is \$322.00.

Thank you,

Berwick Dental Arts, Inc.

HARRY A. ROADARMEL, JR.



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

PHONE
(570) 389-5622

24 HOUR PHONE
(570) 784-6300

91-02

SHERIFF'S SALE REAL ESTATE OUTLINE

- RECEIVED AND TIME STAMP WRIT 9-14-02
- DOCKET AND INDEX 9-14-02
- SET FILE FOLDER UP 9-14-02
- CHECK FOR PROPER INFO
 - WRIT OF EXECUTION
 - COPY OF DESCRIPTION
 - WHEREABOUTS OF LAST KNOWN ADDRESS
 - NON-MILITARY AFFIDAVIT
 - NOTICES OF SHERIFF'S SALE 8
 - WATCHMAN RELEASE FORM
 - AFFIDAVIT OF LEINS LIST
 - CHECK FOR \$1200.00 OK 5189 for \$1,500.00

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

SET SALE DATE AND ADV. DATES AND POSTING DATES Oct. 23, 2002 0900
POST ALL DATES ON CALANDER Post Sept. 18 Adv. Oct. 2, 9, 16, 2002

- * 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

SHERIFF'S SALE

WEDNESDAY OCTOBER 23, 2002 AT 9:00 AM

BY VIRTUE OF A WRIT OF EXECUTION NO. 97 OF 2002 ED AND CIVIL WRIT NO. 733 OF 2002 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 ground, situate in the Borough of Berwick, County of Columbia and State of Pennsylvania, bounded and described as follows, to wit:

BEGINNING in Chestnut Street on alley, three rods from the northwestern boundary of Out-lot No. 73, in Out-lot No. 81; thence by Chestnut Street 10 rods to a 3-rod street; thence by said street 3 rods to Lot No. 22 of J.D. Thompson's Addition to the Town of Berwick; thence on a line parallel with Chestnut Street, the place of beginning.

Title to said premises vested in Julie A. Robinson and Joseph Pecorelli, as Joint Tenants with the Right of Survivorship and not as Tenants in Common, by deed from Margaret S. Carter and Theresa S. Dent co-Executors of the Estate of Edythe H. Slanski, deceased, dated 2/1/00 and recorded 3/6/00 in deed Instrument No. 200002033.

Known as 300 East 11th Street, Berwick, PA 18603

Tax ID No.: 04A-09-222

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.

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 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
Mark J. Udren
1040 N. Kings Hwy
Cherry Hill, NJ 08034

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

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

JP Morgan Chase Bank f/k/a
Chase Bank of Texas National
Association, as Custodian
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120

COURT OF COMMON PLEAS
CIVIL DIVISION
Columbia County
MORTGAGE FORECLOSURE

Plaintiff

v.

Joseph Pecorelli
Julie A. Robinson
300 East 11th Street
Berwick, PA 18603

NO. 2002-CV-733

2002-ED-97

Defendant(s)

WRIT OF EXECUTION

TO THE SHERIFF OF Columbia COUNTY:

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

300 East 11th Street
Berwick, PA 18603
SEE LEGAL DESCRIPTION ATTACHED

Amount due \$65,245.49

Interest From July 24, 2002
to Date of Sale
Per diem @\$15.21

(Costs to be added) \$ _____

Prothonotary

By *Fanni B. [Signature]* / *ESB*
Clerk

Date *7/31/2002*

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

JP Morgan Chase Bank f/k/a
Chase Bank of Texas National
Association, as Custodian
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120

COURT OF COMMON PLEAS
CIVIL DIVISION
Columbia County
MORTGAGE FORECLOSURE

Plaintiff

v.

Joseph Pecorelli
Julie A. Robinson
300 East 11th Street
Berwick, PA 18603

NO. 2002-CV-733

2002-ED-97

Defendant(s)

AFFIDAVIT PURSUANT TO RULE 3129.1

JP Morgan Chase Bank f/k/a Chase Bank of Texas National Association, as Custodian, Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at: 300 East 11th Street, Berwick, PA 18603

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

Name

Address

Joseph Pecorelli

300 East 11th Street
Berwick, PA 18603

Julie A. Robinson

300 East 11th Street
Berwick, PA 18603

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

Name

Address

same as above

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

Name

Address

Berwick Dental Arts, Inc.

105 W. 9th Street, Berwick, PA 18603

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

Name Address

Plaintiff herein. See Caption above.

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

Name Address

none

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

Name Address

Domestic Relations Section PO Box 380, Bloomsburg, PA 17815

Columbia County Tax Claim PO Box 380, Bloomsburg, PA 17815
Bureau

Commonwealth of PA, Bureau of Compliance, Dept. 280946
Department of Revenue Harrisburg, PA 17128-0946

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


Name Address

Tenants/Occupants 300 East 11th Street
Berwick, PA 18603

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

MARK J. UDREN & ASSOCIATES

DATED: July 23, 2002



Mark J. Udren, ESQ.
Attorney for Plaintiff

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

JP Morgan Chase Bank f/k/a
Chase Bank of Texas National
Association, as Custodian
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120

Plaintiff

v.

Joseph Pecorelli
Julie A. Robinson
300 East 11th Street
Berwick, PA 18603

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Columbia County
MORTGAGE FORECLOSURE

NO. 2002-CV-733

2002-ED-97

AFFIDAVIT PURSUANT TO RULE 3129.1

JP Morgan Chase Bank f/k/a Chase Bank of Texas National Association, as Custodian, Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at: 300 East 11th Street, Berwick, PA 18603

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

Name	Address
Joseph Pecorelli	300 East 11th Street Berwick, PA 18603
Julie A. Robinson	300 East 11th Street Berwick, PA 18603

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

Name	Address
same as above	

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

Name	Address
Berwick Dental Arts, Inc.	105 W. 9th Street, Berwick, PA 18603

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

Name Address

Plaintiff herein. See Caption above.

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

Name Address

none

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

Name Address

Domestic Relations Section PO Box 380, Bloomsburg, PA 17815

Columbia County Tax Claim PO Box 380, Bloomsburg, PA 17815
Bureau

Commonwealth of PA, Bureau of Compliance, Dept. 280946
Department of Revenue Harrisburg, PA 17128-0946

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

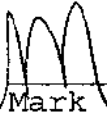
Name Address

Tenants/Occupants 300 East 11th Street
Berwick, PA 18603

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

MARK J. UDREN & ASSOCIATES

DATED: July 23, 2002



Mark J. Udren, ESQ.
Attorney for Plaintiff

MARK J. UDREN & ASSC .ATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

JP Morgan Chase Bank f/k/a
Chase Bank of Texas National
Association, as Custodian
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120

Plaintiff

v.

Joseph Pecorelli
Julie A. Robinson
300 East 11th Street
Berwick, PA 18603

Defendant (s)

: COURT OF COMMON PLEAS
: CIVIL DIVISION
: Columbia County
: MORTGAGE FORECLOSURE

: NO. 2002-CV-733

: *2002-ED-97*

AFFIDAVIT PURSUANT TO RULE 3129.1

JP Morgan Chase Bank f/k/a Chase Bank of Texas National Association, as Custodian, Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praecipe for the Writ of Execution was filed the following information concerning the real property located at: 300 East 11th Street, Berwick, PA 18603

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Name	Address
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Julie A. Robinson	300 East 11th Street Berwick, PA 18603
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2. Name and address of Defendant(s) in the judgment:

Name	Address
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same as above

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

Name	Address
Berwick Dental Arts, Inc.	105 W. 9th Street, Berwick, PA 18603

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

Name Address

Plaintiff herein. See Caption above.

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

Name Address

none

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

Name Address

Domestic Relations Section PO Box 380, Bloomsburg, PA 17815

Columbia County Tax Claim PO Box 380, Bloomsburg, PA 17815
Bureau

Commonwealth of PA, Bureau of Compliance, Dept. 280946
Department of Revenue Harrisburg, PA 17128-0946

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


Name Address

Tenants/Occupants 300 East 11th Street
Berwick, PA 18603

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

MARK J. UDREN & ASSOCIATES

DATED: July 23, 2002



Mark J. Udren, ESQ.
Attorney for Plaintiff

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

JP Morgan Chase Bank f/k/a Chase Bank of Texas National Association, as Custodian
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120

COURT OF COMMON PLEAS
CIVIL DIVISION
Columbia County
MORTGAGE FORECLOSURE

Plaintiff

v.

Joseph Pecorelli
Julie A. Robinson
300 East 11th Street
Berwick, PA 18603

NO. 2002-CV-733

2002-ED-97

Defendant(s)

AFFIDAVIT PURSUANT TO RULE 3129.1

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Name	Address
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Julie A. Robinson	300 East 11th Street Berwick, PA 18603

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

Name	Address
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same as above

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Name	Address
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Name Address

Plaintiff herein. See Caption above.

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

Name Address

none

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Department of Revenue Harrisburg, PA 17128-0946

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

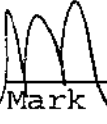
Name Address

Tenants/Occupants 300 East 11th Street
Berwick, PA 18603

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

MARK J. UDREN & ASSOCIATES

DATED: July 23, 2002



Mark J. Udren, ESQ.
Attorney for Plaintiff

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO.04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
856-482-6900

ATTORNEY FOR PLAINTIFF

JP Morgan Chase Bank f/k/a
Chase Bank of Texas National
Association, as Custodian
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120

Plaintiff

v.

Joseph Pecorelli
Julie A. Robinson
300 East 11th Street
Berwick, PA 18603

Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Columbia County
MORTGAGE FORECLOSURE

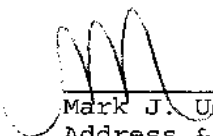
NO. 2002-CV-733

2002. ED 97

CERTIFICATE TO THE SHERIFF

I HEREBY CERTIFY THAT:

- I. The judgment entered in the above matter is based on an Action:
- A. In Assumpsit (Contract)
 - B. In Trespass (Accident)
 - C. In Mortgage Foreclosure
 - D. On a Note accompanying a purchase money mortgage and the property being exposed to sale is the mortgaged property.
- II. The Defendant(s) own the property being exposed to sale as:
- A. An individual
 - B. Tenants by Entireties
 - C. Joint Tenants with right of survivorship
 - D. A partnership
 - E. Tenants in Common
 - F. A corporation
- III. The Defendant(s) is (are):
- A. Resident in the Commonwealth of Pennsylvania
 - B. Not resident in the Commonwealth of Pennsylvania
 - C. If more than one Defendant and either A or B above is not applicable, state which Defendant is resident of the Commonwealth of Pennsylvania.
Resident:



Mark J. Udren, ESQUIRE
Address & I.D. # as above

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
CHERRY HILL, NJ 08034
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NO. 2002-CV-733

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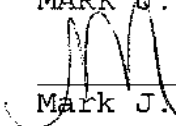
C E R T I F I C A T E

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff in the above-captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

- () An FHA insured mortgage
- () Non-owner occupied
- () Vacant
- (x) Act 91 procedures have been fulfilled.
- () Over 24 months delinquent.

This certification is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

MARK J. UDREN & ASSOCIATES


Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
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Defendant(s)

COURT OF COMMON PLEAS
CIVIL DIVISION
Columbia County
MORTGAGE FORECLOSURE

NO. 2002-CV-733

2002-ED-97


C E R T I F I C A T E

Mark J. Udren, Esquire, hereby states that he is the attorney for the Plaintiff in the above-captioned matter and that the premises are not subject to the provisions of Act 91 because it is:

- () An FHA insured mortgage
- () Non-owner occupied
- () Vacant
- (x) Act 91 procedures have been fulfilled.
- () Over 24 months delinquent.

This certification is made subject to the penalties of 18 Pa. C.S. Sec. 4904 relating to unsworn falsification to authorities.

MARK J. UDREN & ASSOCIATES



Mark J. Udren, ESQUIRE
ATTORNEY FOR PLAINTIFF

MARK J. UDREN & ASSOCIATES
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
1040 N. KINGS HIGHWAY, SUITE 500
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ATTORNEY FOR PLAINTIFF

JP Morgan Chase Bank f/k/a
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1270 Northland Drive
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COURT OF COMMON PLEAS
CIVIL DIVISION
Columbia County
MORTGAGE FORECLOSURE

Plaintiff

v.

Joseph Pecorelli
Julie A. Robinson
300 East 11th Street
Berwick, PA 18603

NO. 2002-CV-733

2002-ED-97

Defendant(s)

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

TO: Julie A. Robinson
300 East 11th Street
Berwick, PA 18603

Your house (real estate) at 300 East 11th Street, Berwick, PA 18603 is scheduled to be sold at the Sheriff's Sale on _____, at _____ in the Columbia County Courthouse, Bloomsburg, PA 17815, to enforce the court judgment of \$65,245.49, obtained by Plaintiff above (the mortgagee) against you. If the sale is postponed, the property will be relisted for the Next Available Sale.

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 payment, late charges, costs and reasonable attorney's fees. To find out how much you must pay, you may call: (856)-482-6900.
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 AS 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 856-482-6900.

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 856-482-6900.

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 within 30 days after the 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 Schedule of Distribution is filed.

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.

LAWYER REFERRAL SERVICE
Susquehanna Legal Services
168 E. 5th Street
Bloomsburg, PA 17815
570 784 8760

ASSOCIATION DE LICENCIADOS DE FILADELFIA
Susquehanna Legal Services
168 E. 5th Street
Bloomsburg, PA 17815
570 784 8760

ALL that certain piece or parcel of ground, situate in the Borough of Berwick, County of Columbia and State of Pennsylvania, bounded and described as follows, to wit:

BEGINNING in Chestnut Street on alley, three rods from the northwestern boundary of Out-lot No. 73, in Out-lot No. 81; thence by Chestnut Street 10 rods to a 3-rod street; thence by said street 3 rods to Lot No. 22 of J. D. Thompson's Addition to the Town of Berwick; thence on a line parallel with Chestnut Street, 10 rods to the alley aforesaid; thence by said alley 3 rods to Chestnut Street, the place of beginning.

Title to said premises vested in Julie A. Robinson and Joseph Pecorelli, as Joint Tenants with the Right of Survivorship and not as Tenants in Common, by deed from Margaret S. Carter and Theresa S. Dent co-Executors of the Estate of Edythe H. Slanski, deceased, dated 2/1/00 and recorded 3/6/00 in deed Instrument No. 200002033.

Known as 300 East 11th Street, Berwick, PA 18603

Tax ID No.: 04A-09-222

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LAW OFFICES
MARK J. UDREN & ASSOCIATES
1040 NORTH KINGS HIGHWAY
SUITE 500
CHERRY HILL, NEW JERSEY 08034
856 . 482 . 6900
FAX: 856 . 482 . 1199

FREDDIE MAC.
PENNSYLVANIA
DESIGNATED COUNSEL

July 23, 2002

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

Re: JP Morgan Chase Bank f/k/a Chase Bank of Texas National
Association, as Custodian
vs.
Joseph Pecorelli
Julie A. Robinson
Columbia County C.C.P. No.2002-CV-733

Dear Sir or Madam:

Please serve the Defendant's, **Joseph Pecorelli and Julie A. Robinson**, with the Notice of Sheriff's Sale and any other required documents at **300 East 11th Street, Berwick, PA 18603**.

Kindly return to me the completed service form in the enclosed self addressed stamped envelope.

Thank you for your assistance in this matter.

Very truly yours,



Mark J. Udren, Esquire
MARK J. UDREN & ASSOCIATES

MJU/cms

Enclosures

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1040 NORTH KINGS HIGHWAY
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MARK J. UDREN & ASSOCIATES

MJU/cms

Enclosures

PLAINTIFF
JP Morgan Chase Bank

IN THE COURT OF COMMON PLEAS OF
COLUMBIA COUNTY, PA.


NO. 733-2002 J.D.

NO. 97-2002 E.D.

DEFENDANT
Joseph Pecorelli
Julie Robinson

CIVIL ACTION--LAW
MORTGAGE FORECLOSURE

WAIVER OF WATCHMAN

I, Attorney  do hereby state that any Deputy Sheriff or Sheriff levying upon or attaching any property under the writ issued in the above-captioned matter may leave same without a watchman, in custody of whomever is found in possession, after notifying such person of such levy or attachment, without liability on the part of such Deputy Sheriff or Sheriff to any Plaintiff herein for any loss, destruction or removal of any such property before the Sheriff's Sale thereof.

Attorney for Plaintiff