

UDREN LAW OFFICES, P.C.
BY: Mark J. Udren, Esquire
ATTY I.D. NO. 04302
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD, SUITE 200
CHERRY HILL, NJ 08003-3620
856-669-5400

ATTORNEY FOR PLAINTIFF

JPMorgan Chase Bank formerly
known as The Chase Manhattan
Bank successor by merger to
Chase Bank of Texas, National
Association (formerly named
Texas Commerce Bank, National
Association), as Trustee and
Custodian By: Saxon Mortgage
Services Inc. f/k/a Meritech
Mortgage Services Inc. as
their attorney-in-fact
1270 Northland Drive
Suite 200
Mendota Heights, MN 55120
Plaintiff

COURT OF COMMON PLEAS
CIVIL DIVISION
Columbia County

MORTGAGE FORECLOSURE

v.

John A. Dennis, Jr.
Michelle B. Dennis
3 Old Mill Road
Berwick, PA 18603

NO. 2003-CV-273

2003-ED-69

Defendant(s)

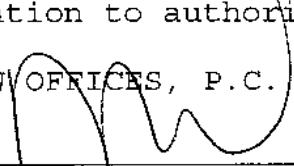
C E R T I F I C A T E

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.

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Defendant(s)

AFFIDAVIT PURSUANT TO RULE 3129.1

JPMorgan Chase Bank formerly known as The Chase Manhattan Bank successor by merger to Chase Bank of Texas, National Association (formerly named Texas Commerce Bank, National Association), as Trustee and Custodian By: Saxon Mortgage Services Inc. f/k/a Meritech Mortgage Services Inc. as their attorney-in-fact, Plaintiff in the above action, by its attorney, Mark J. Udren, ESQ., sets forth as of the date the Praeipce for the Writ of Execution was filed the following information concerning the real property located at: RR 4, Box 4836 (Twp. of Briar Creek) Berwick, PA 18603

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

Name	Address
John A. Dennis, Jr.	3 Old Mill Road Berwick, PA 18603
Michelle B. Dennis	3 Old Mill Road Berwick, PA 18603

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

Name	Address
------	---------

SAME AS #1 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 105 W. 9th Street
Berwick, PA

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

Name Address

Plaintiff herein. See Caption above.

Pennsylvania Housing 2101 North Front Street
Finance Agency P.O. Box 15530
Harrisburg, PA 17105-5530

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

Name Address

Berwick Area Joint Address to follow
Sewer Authority

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

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

Domestic Relations Section PO Box 380
Bloomsburg, PA 17815

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:

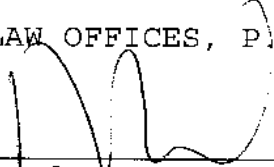
Name Address

Tenants/Occupants RR 4, BOX 4836 (TWP. OF BRIAR CREEK)
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.

UDREN LAW OFFICES, P.C.

DATED: August 6, 2004



Mark J. Udren, ESQ.
Attorney for Plaintiff

UDREN LAW OFFICES, P.C.
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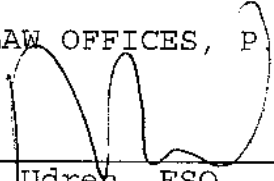
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DATED: August 6, 2004



Mark J. Udren, ESQ.
Attorney for Plaintiff

UDREN LAW OFFICES, P.C.

ATTORNEY FOR PLAINTIFF

BY: Mark J. Udren, Esquire

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NO. 2003-CV-273

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Defendant(s)

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

TO: John A. Dennis, Jr.
3 Old Mill Road
Berwick, PA 18603

Your house (real estate) at RR 4, Box 4836 (Twp. of Briar Creek) Berwick, PA 18603 is scheduled to be sold at the Sheriff's Sale on _____, at _____ in the Columbia County Courthouse, Bloomsburg, PA, to enforce the court judgment of \$45,400.09, 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) 669-5400.
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 856-669-5400.
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 856-669-5400.
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 East 5th Street
Bloomsburg, PA 17815
570-784-8760

ASSOCIATION DE LICENCIADOS
Susquehanna Legal Services
168 East 5th Street
Bloomsburg, PA 17815
570-784-8760

ALL THAT CERTAIN PIECE, PARCEL OR TRACT OF LAND SITUATE IN THE TOWNSHIP OF BRIAR CREEK, COUNTY OF COLUMBIA AND STATE OF PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO WIT:

BEGINNING AT A POINT IN THE CENTER OF THE PUBLIC ROAD LEADING FROM FOUNDRYVILLE TO MILLER HOTEL SAID POINT BEING ON THE LINE OF LAND NOW OR FORMERLY OF N. BELLES; THENCE ALONG THE LINE OF N. BELLES, NORTH 67 DEGREES 15 MINUTES EAST 319.0 FEET TO AN IRON PIN CORNER IN LINE OF OTHER LAND OF DAVID W. ASHELMAN, ET UX, NOW OR LATE; THENCE ALONG OTHER LAND OF DAVID W. ASHELMAN, ET UX, NOW OR LATE, SOUTH 32 DEGREES EAST 146.4 FEET TO AN IRON PIN CORNER IN LINE OF OTHER LAND OF DAVID W. ASHELMAN, ET UX, NOW OR LATE; THENCE ALONG OTHER LAND OF DAVID W. ASHELMAN, ET UX, NOW OR LATE, SOUTH 63 DEGREES 06 MINUTES WEST 97.2 FEET TO AN IRON PIN CORNER, THENCE CONTINUING ALONG OTHER LAND OF DAVID W. ASHELMAN, ET UX, NOW OR LATE, SOUTH 78 DEGREES 27 MINUTES WEST, A DISTANCE OF 199.0 FEET TO AN IRON PIN CORNER IN THE ROAD LEADING TO MOORE DAM; THENCE CONTINUING IN THE CENTER OF SAID ROAD, SOUTH 65 DEGREES 45 MINUTES WEST 49.5 FEET TO THE CENTER OF THE INTERSECTION OF A ROAD LEADING FROM FOUNDRYVILLE TO MILLER HOTEL AND THE ROAD LEADING TO MOORE DAM; THENCE ALONG THE CENTER OF THE ROAD LEADING FROM FOUNDRYVILLE TO MILLER HOTEL, NORTH 34 DEGREES 45 MINUTES WEST, 113.20 FEET TO THE PLACE OF BEGINNING.

CONTAINING 1.00 ACRES IN ACCORDANCE TO A SURVEY PREPARED BY LAWRENCE G. LEBO FOR DAVID ASHELMAN, DATED FEBRUARY 6, 1973.

BEING KNOWN AS: RR 4, BOX 4836 (TWP. OF BRIAR CREEK)
BERWICK, PA 18603

PROPERTY ID NO.: 07-03B-031-02

TITLE TO SAID PREMISES IS VESTED IN JOHN A. DENNIS JR. AND MICHELLE B. DENNIS, HUSBAND AND WIFE BY DEED FROM PATRICIA M. WRIGHT, NOW BY MARRIAGE, PATRICIA M. RUPP AND MICHAEL RUPP, HER HUSBAND DATED 08/27/99 RECORDED 09/15/99 IN DEED BOOK 738 PAGE 59.

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111 WOODCREST ROAD

SUITE 200

CHERRY HILL, NEW JERSEY 08003-3620

856. 669-5400

FAX: 856. 669-5399

PENNSYLVANIA OFFICE

215-568-9500

215-568-1141 FAX

MARK J. UDREN*
STUART WINNEG**
GAYL SPIVAK ORLOFF***
HEIDI R. SPIVAK***
CHRISTOPHER J. FOX***
MARISA JOY MYERS***
LORRAINE DOYLE**
ALAN M. MINATO***
DWIGHT MICHAELSON***

***ADMITTED NJ, PA, FL**

****ADMITTED NJ, PA, FL**

****ADMITTED PA**

*****ADMITTED NJ, PA**

TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PLEASE RESPOND TO NEW JERSEY OFFICE

August 6, 2004

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

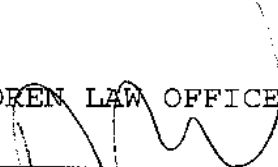
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vs.
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Michelle B. Dennis
Columbia County C.C.P. No. 2003-CV-273

Dear Sir:

Please serve the Defendant(s), John A. Dennis, Jr. and Michelle B. Dennis at
3 Old Mill Road, Berwick, PA 18603.

Please then, **POST** the property with the Handbill at RR 4, Box 4836 (Twp. of
Briar Creek), Berwick, PA 18603.

UDREN LAW OFFICES, P.C.



Mark J. Udren, Esquire
Attorney for Plaintiff

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BEGINNING AT A POINT IN THE CENTER OF THE PUBLIC ROAD LEADING FROM FOUNDRYVILLE TO MILLER HOTEL SAID POINT BEING ON THE LINE OF LAND NOW OR FORMERLY OF N. BELLES; THENCE ALONG THE LINE OF N. BELLES, NORTH 67 DEGREES 15 MINUTES EAST 319.0 FEET TO AN IRON PIN CORNER IN LINE OF OTHER LAND OF DAVID W. ASHELMAN, ET UX, NOW OR LATE; THENCE ALONG OTHER LAND OF DAVID W. ASHELMAN, ET UX, NOW OR LATE, SOUTH 32 DEGREES EAST 146.4 FEET TO AN IRON PIN CORNER IN LINE OF OTHER LAND OF DAVID W. ASHELMAN, ET UX, NOW OR LATE; THENCE ALONG OTHER LAND OF DAVID W. ASHELMAN, ET UX, NOW OR LATE, SOUTH 63 DEGREES 06 MINUTES WEST 97.2 FEET TO AN IRON PIN CORNER, THENCE CONTINUING ALONG OTHER LAND OF DAVID W. ASHELMAN, ET UX, NOW OR LATE, SOUTH 78 DEGREES 27 MINUTES WEST, A DISTANCE OF 199.0 FEET TO AN IRON PIN CORNER IN THE ROAD LEADING TO MOORE DAM; THENCE CONTINUING IN THE CENTER OF SAID ROAD, SOUTH 65 DEGREES 45 MINUTES WEST 49.5 FEET TO THE CENTER OF THE INTERSECTION OF A ROAD LEADING FROM FOUNDRYVILLE TO MILLER HOTEL AND THE ROAD LEADING TO MOORE DAM; THENCE ALONG THE CENTER OF THE ROAD LEADING FROM FOUNDRYVILLE TO MILLER HOTEL, NORTH 34 DEGREES 45 MINUTES WEST, 113.20 FEET TO THE PLACE OF BEGINNING.

CONTAINING 1.00 ACRES IN ACCORDANCE TO A SURVEY PREPARED BY LAWRENCE G. LEBO FOR DAVID ASHELMAN, DATED FEBRUARY 6, 1973.

BEING KNOWN AS: RR 4, BOX 4836 (TWP. OF BRIAR CREEK)
BERWICK, PA 18603

PROPERTY ID NO.: 07-03B-031-02

TITLE TO SAID PREMISES IS VESTED IN JOHN A. DENNIS JR. AND MICHELLE B. DENNIS, HUSBAND AND WIFE BY DEED FROM PATRICIA M. WRIGHT, NOW BY MARRIAGE, PATRICIA M. RUPP AND MICHAEL RUPP, HER HUSBAND DATED 08/27/99 RECORDED 09/15/99 IN DEED BOOK 738 PAGE 59.

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UDREN LAW OFFICES, P.C.
WOODCREST CORPORATE CENTER
111 WOODCREST ROAD
SUITE 200

CHERRY HILL, NEW JERSEY 08003-3620
856. 669-5400
FAX: 856. 669-5399

PENNSYLVANIA OFFICE
215-568-9500
215-568-1141 FAX

MARK J. UDREN*
STUART WINNEG**
GAYL SPIVAK ORLOFF***
HEIDI R. SPIVAK***
CHRISTOPHER J. FOX***
MARISA JOY MYERS***
LORRAINE DOYLE**
ALAN M. MINATO***
DWIGHT MICHAELSON***
*ADMITTED NJ, PA, FL
*ADMITTED NJ, PA, FL
**ADMITTED PA
***ADMITTED NJ, PA
TINA MARIE RICH
OFFICE ADMINISTRATOR

FREDDIE MAC
PENNSYLVANIA
DESIGNATED COUNSEL

PLEASE RESPOND TO NEW JERSEY OFFICE

August 6, 2004

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

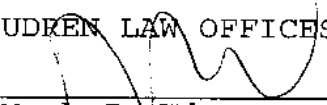
Re: JPMorgan Chase Bank formerly known as The Chase Manhattan Bank
successor by merger to Chase Bank of Texas, National Association
(formerly named Texas Commerce Bank, National Association), as
Trustee and Custodian By: Saxon Mortgage Services Inc. f/k/a
Meritech Mortgage Services Inc. as their attorney-in-fact
vs.
John A. Dennis, Jr.
Michelle B. Dennis
Columbia County C.C.P. No. 2003-CV-273

Dear Sir:

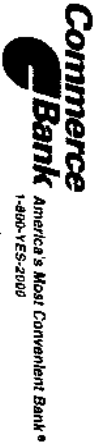
Please serve the Defendant(s), John A. Dennis, Jr. and Michelle B. Dennis at
3 Old Mill Road, Berwick, PA 18603.

Please then, **POST** the property with the Handbill at RR 4, Box 4836 (Twp. of
Briar Creek), Berwick, PA 18603.

UDREN LAW OFFICES, P.C.


Mark J. Udren, Esquire
Attorney for Plaintiff

UDREN LAW OFFICES, PC
PA ESCROW ACCOUNT
111 WOODCREST ROAD
CHERRY HILL, NJ 08003



17009

17009

NUMBER

One Thousand Five hundred dollars and Zero cents

PAY TO THE ORDER OF Sheriff of Columbia County

DATE 08/06/2004 AMOUNT \$1,500.00

VOID AFTER 90 DAYS

For Sheriff Sale Deposit 0237193 Dennis

017009 0360018081 36 589745 3