

SHERIFF'S SALE COST SHEET

Deutsche Bank vs. Pierce
 NO. 56-05 ED NO. 321-05 JD DATE/TIME OF SALE stayed

DOCKET/RETURN	\$15.00
SERVICE PER DEF.	\$ <u>180.00</u>
LEVY (PER PARCEL	\$15.00
MAILING COSTS	\$ <u>27.50</u>
ADVERTISING SALE BILLS & COPIES	\$17.50
ADVERTISING SALE (NEWSPAPER)	\$15.00
MILEAGE	\$ <u>16.00</u>
POSTING HANDBILL	\$15.00
CRYING/ADJOURN SALE	\$10.00
SHERIFF'S DEED	\$35.00
TRANSFER TAX FORM	\$25.00
DISTRIBUTION FORM	\$25.00
COPIES	\$ <u>6.00</u>
NOTARY	\$ <u>15.00</u>
TOTAL ***** \$ <u>332.00</u>	

WEB POSTING	\$150.00
PRESS ENTERPRISE INC.	\$ <u>391.24</u>
SOLICITOR'S SERVICES	\$75.00
TOTAL ***** \$ <u>616.24</u>	

PROTHONOTARY (NOTARY)	\$ 10.00
RECORDER OF DEEDS	\$
TOTAL ***** \$ <u>-0-</u>	

REAL ESTATE TAXES:		
BORO, TWP & COUNTY 20		\$
SCHOOL DIST. 20		\$
DELINQUENT 20		\$ <u>5.00</u>
TOTAL ***** \$ <u>5.00</u>		

MUNICIPAL FEES DUE:		
SEWER 20		\$
WATER 20		\$
TOTAL ***** \$ <u>-0-</u>		

SURCHARGE FEE (DSTE)	\$ <u>130.00</u>
MISC. _____	\$
_____	\$
TOTAL ***** \$ <u>-0-</u>	

TOTAL COSTS (OPENING BID)

1350.00 Dep
 \$ 1083.24
 # 266.76 Refund

Law Offices
PHELAN HALLINAN & SCHMIEG, LLP
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
Main Fax: (215)563-5534
Ph: (215)563-7000

Katherine Trautz
Sale Department, Ext. 1493

Representing Lenders in
Pennsylvania and New Jersey

June 30, 2005

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

**Re: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE
v. ROBERT G. PIERCE, A/K/A ROBERT GERALD PIERCE, JR., A/K/A
ROBERT G. PIERCE, JR. and KAREN PIERCE, A/K/A KAREN A. PIERCE
No. 321CV2005**

Dear Sir or Madam:

Please stay the Sheriff's Sale of the above referenced property, which is scheduled for 7/13/05.

The Defendant (s) filed a Chapter 7 Bankruptcy (No. 05-53455) on 6/15/05.

Very truly yours,

Katherine Trautz
/kjm

VIA TELECOPY 570-389-5623

**Co: ROBERT G. PIERCE, A/K/A ROBERT GERALD PIERCE, JR., A/K/A ROBERT G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A. PIERCE
214 EAST 6TH STREET
BERWICK, PA 18603**

DOMESTIC RELATIONS SECTION OF COLUMBIA COUNTY

**STATEMENT OF LIEN BY OPERATION OF LAW ARISING
FROM OVERDUE SUPPORT OBLIGATIONS**

1. Obligor information (To be completed by requestor)

Please search your records of child and spousal obligations to determine whether any record of overdue support exists for the following person:

<u>NAME</u>	<u>DATE OF BIRTH</u>	<u>SOCIAL SECURITY#</u>
Robert G. Pierce Jr	12/31/63	195-56-4989

DATE: 6/22/05 REQUESTOR: Sheriff Sale
Print Name
321042005
Signature

II. Lien information (To be provided by DRS)

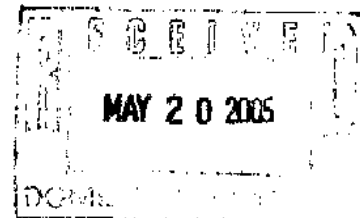
WE HAVE NO RECORD OF ANY CASE WITH THE ABOVE NAMED INDIVIDUAL.

X WE HAVE AN OPEN CASE, WITH NO OVERDUE SUPPORT OWED.

WE HAVE THE FOLLOWING RECORD OF OVERDUE SUPPORT OWED BY THE ABOVE NAMED OBLIGOR. THIS OVERDUE SUPPORT IS A LIEN BY OPERATION OF LAW AGAINST ALL REAL ESTATE OWNED BY THE OBLIGOR WITHIN THE JUDICIAL DISTRICT.

<u>Amount of Overdue Support</u>	<u>Next Due Date</u>	<u>Next Payment Amount</u>
----------------------------------	----------------------	----------------------------

Date: 6/22/05 BY: John H. Swan
TITLE: Cust. Svs.



DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE

vs.

ROBERT G. PIERCE, A/K/A ROBERT GERALD PIERCE, JR., A/K/A ROBERT
G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A. PIERCE

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

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

OWNER(S): ROBERT G. PIERCE, A/K/A ROBERT GERALD PIERCE, JR.,
A/K/A ROBERT G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A. PIERCE

PROPERTY: 410 EAST 8TH STREET
BERWICK, PA 18603

Improvements: Residential dwelling

Judgment Amount: \$63,070.95

COLUMBIA COUNTY

NO. 321CV2005

The above-captioned property is scheduled to be sold at the Columbia
County Sheriff's Sale on JUL 13, 2005, at the Columbia County Courthouse, P.O.
Box 380, Bloomsburg, PA 17815 at 9:30am.

Our records indicate that you may hold a mortgage, judgment, or other interest on the
property, which may be extinguished by the sale. You may wish to attend the sale to protect
your interests. If you have any questions regarding the type of lien or the effect of the
Sheriff's Sale upon your lien, we urge you to **CONTACT YOUR OWN ATTORNEY**, as
we are not permitted to give you legal advice.

The Sheriff will file a schedule of Distribution 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.

*Credit
Paid*

56

PHELAN HALLINAN & SCHMIEG, LLP
1617 JFK Boulevard, Suite 1400
Philadelphia, PA 19103-1814
Automated Attendant # 215-320-0007 ext 1478
Operated Assisted # 215-563-7000 ext 1478
Fax # 215-563-8656
Lisa.Steinman@fedphe.com

June 16, 2005

Office of the Sheriff
COLUMBIA County Courthouse
P.O. BOX 380
BLOOMSBURG, PA 17815

RE: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE
V. ROBERT G. PIERCE A/K/A ROBERT GERALD PIERCE, JR. A/K/A
ROBERT G. PIERCE, JR. and KAREN PIERCE A/K/A KAREN A. PIERCE
COLUMBIA COUNTY, NO. 321 CV 2005

RE: AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129
Dear Sir or Madam:

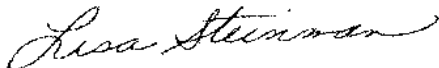
Enclosed please find the following:

XX Affidavit of service pursuant to rule 3129 with attachments.

Please find attached a copy of the original Affidavit of service pursuant to rule 3129, which has been sent for filing with the COLUMBIA County Prothonotary's Office as of the date of this letter.

*******IMPORTANT NOTICE: This property is sold at the direction of the plaintiff. It may not be sold in the absence of a representative of the plaintiff at the Sheriff's Sale. The sale must be postponed or stayed in the event that a representative of the plaintiff is not present at the sale.*******

Yours truly,



LISA STEINMAN
for PHELAN HALLINAN & SCHMIEG, LLP

*****PROPERTY IS LISTED FOR THE 7/13/05 SHERIFF'S SALE.*****

<p>Article Addressed to:</p> <p>U. S. SMALL BUSINESS ADMINISTRATION PHILADELPHIA DISTRICT OFFICE ROBERT N. C. NIX FEDERAL BUILDING 900 MARKET STREET - 5TH FLOOR PHILADELPHIA, PA 19107</p>	<p>Article Number (Transfer from service label)</p> <p>7004 0550 0000 7003 7277</p>	<p>Domestic Return Receipt</p> <p>PS Form 3811, February 2004</p>
<p>1. Article Addressed to:</p> <p>U. S. SMALL BUSINESS ADMINISTRATION PHILADELPHIA DISTRICT OFFICE ROBERT N. C. NIX FEDERAL BUILDING 900 MARKET STREET - 5TH FLOOR PHILADELPHIA, PA 19107</p>	<p>2. Article Number (Transfer from service label)</p> <p>7004 0550 0000 7003 7277</p>	<p>Domestic Return Receipt</p> <p>PS Form 3811, February 2004</p>

<p>Article Addressed to:</p> <p>INTERNAL REVENUE SERVICE TECHNICAL SUPPORT GROUP WILLIAM GREEN FEDERAL BUILDING 100 ARCH STREET ROOM 3259 PHILADELPHIA, PA 19106</p>	<p>Article Number (Transfer from service label)</p> <p>7004 0550 0000 7003 7284</p>	<p>Domestic Return Receipt</p> <p>PS Form 3811, February 2004</p>
<p>1. Article Addressed to:</p> <p>INTERNAL REVENUE SERVICE TECHNICAL SUPPORT GROUP WILLIAM GREEN FEDERAL BUILDING 100 ARCH STREET ROOM 3259 PHILADELPHIA, PA 19106</p>	<p>2. Article Number (Transfer from service label)</p> <p>7004 0550 0000 7003 7284</p>	<p>Domestic Return Receipt</p> <p>PS Form 3811, February 2004</p>

<p>Article Addressed to:</p> <p>COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF REVENUE-ATTN: SHERIFF SALE BUREAU OF COMPLIANCE CLEARANCE SUPPORT SECTION DEPARTMENT 281230 HARRISBURG, PA 17128-1230</p>	<p>Article Number (Transfer from service label)</p> <p>7004 0550 0000 7003 7253</p>	<p>Domestic Return Receipt</p> <p>PS Form 3811, February 2004</p>
<p>1. Article Addressed to:</p> <p>COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF REVENUE-ATTN: SHERIFF SALE BUREAU OF COMPLIANCE CLEARANCE SUPPORT SECTION DEPARTMENT 281230 HARRISBURG, PA 17128-1230</p>	<p>2. Article Number (Transfer from service label)</p> <p>7004 0550 0000 7003 7253</p>	<p>Domestic Return Receipt</p> <p>PS Form 3811, February 2004</p>

IN THE COURT OF COMMON PLEAS OF COLUMBIA COUNTY, PENNSYLVANIA

RE: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE

) CIVIL ACTION

vs.

ROBERT G. PIERCE A/K/A
ROBERT GERALD PIERCE, JR. A/K/A
ROBERT G. PIERCE, JR.) CIVIL DIVISION
KAREN PIERCE A/K/A
KAREN A. PIERCE) NO. 321 CV 2005

AFFIDAVIT OF SERVICE PURSUANT TO RULE 3129

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF COLUMBIA)

SS:

I, DANIEL G. SCHMIEG, ESQUIRE attorney for **DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE** hereby verify that on **5/18/05** true and correct copies of the Notice of Sheriff's sale were served by certificate of mailing to the recorded lienholders, and any known interested party see Exhibit "A" attached hereto.

DATE: June 16, 2005

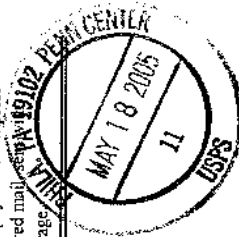
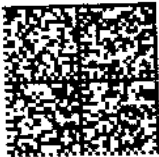

DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Name and Address Of Sender
PHILAN HALLINAN & SCHMIEG, LLP
One Penn Center at Suburban Station Suite 1400
Philadelphia, PA 19103-1814 TEAM 3/

Line	A. Article Number	Name of Addressee, Street, and Post Office Address
1	****	Tenant/Occupant 410 EAST 8TH STREET BERWICK, PA 18603
2		COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF WELFARE P.O. BOX 2675 HARRISBURG, PA 17105
3		DOMESTIC RELATIONS OF COLUMBIA COUNTY COLUMBIA COUNTY COURTHOUSE P.O. Box 380 Bloomsburg, PA 17815
4		
5		
6		
7		
8		
9		
10		
11		
12		
		RE: ROBERT G. PIERCE, A/K/A ROBERT GERALD PIERCE, JR., A/K/A ROBERT G. PIERCE, JR. TEAM 3

Total Number of Pieces Listed By Sender	Total Number of Pieces Received at Post Office	Signature of Receiver (Name Of Receiver)	Postmark

UNITED STATES POSTAGE
 02 1A
 0004300377 MAY 18 2005
 \$ 00.90
 PRINTED BY BOWEN
 MAILED FROM ZIP CODE 19103



TIMOTHY T. CHAMBERLAIN



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

PHONE
(570) 389-5622

24 HOUR PHONE
(570) 784-6300

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

DEUTSCHE BANK NATIONAL TRUST CO.

VS.

ROBERT & KAREN PIERCE

WRIT OF EXECUTION #56 OF 2005 ED

POSTING OF PROPERTY

June 9, 2005 POSTED A COPY OF THE SHERIFF'S SALE BILL ON THE
PROPERTY OF ROBERT & KAREN PIERCE AT 410 E. 8TH BERWICK
COLUMBIA COUNTY PENNSYLVANIA. SAID POSTING PERFORMED BY
COLUMBIA COUNTY SHERIFF TIMOTHY T. CHAMBERLAIN.

SO ANSWERS:

DEPUTY SHERIFF

TIMOTHY T. CHAMBERLAIN
SHERIFF

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 9TH DAY OF JUNE 2005

TIMOTHY T. CHAMBERLAIN



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

PHONE
(570) 389-5622

24 HOUR PHONE
(570) 784-6300

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE

VS

Docket # 56ED2005

WRIT OF EXECUTION - MORTGAGE
FORECLOSURE

ROBERT G. PIERCE, AKA ROBERT
GERALD PIERCE, JR., AKA ROBERT G.
PIERCE, JR.
KAREN PIERCE, AKA KAREN A. PIERCE

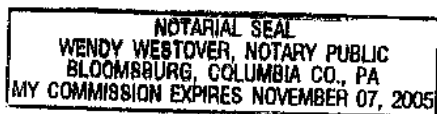
AFFIDAVIT OF SERVICE

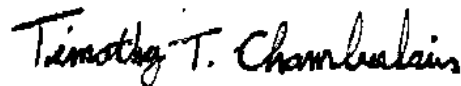
NOW, THIS WEDNESDAY, MAY 11, 2005, AT 10:45 AM, SERVED THE WITHIN WRIT OF
EXECUTION - MORTGAGE FORECLOSURE UPON KAREN PIERCE AT 1200 1ST AVE. APT.
C, BERWICK BY HANDING TO KAREN PIERCE, A TRUE AND ATTESTED COPY OF THE
ORIGINAL WRIT AND MADE KNOWN TO THEM THE CONTENTS THEREOF.

SO ANSWERS,

SWORN AND SUBSCRIBED BEFORE ME
THIS THURSDAY, MAY 19, 2005


NOTARY PUBLIC





X
TIMOTHY T. CHAMBERLAIN
SHERIFF

X 
P. D'ANGELO
DEPUTY SHERIFF

TIMOTHY T. CHAMBERLAIN



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

PHONE
(570) 389-5622

24 HOUR PHONE
(570) 784-6300

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE

VS

Docket # 56ED2005

WRIT OF EXECUTION - MORTGAGE
FORECLOSURE

ROBERT G. PIERCE, AKA ROBERT
GERALD PIERCE, JR., AKA ROBERT G.
PIERCE, JR.
KAREN PIERCE, AKA KAREN A. PIERCE

AFFIDAVIT OF SERVICE

NOW, THIS WEDNESDAY, MAY 11, 2005, AT 9:45 AM, SERVED THE WITHIN WRIT OF
EXECUTION - MORTGAGE FORECLOSURE UPON ROBERT PIERCE JR. AT 214 E. 6TH
ST., BERWICK BY HANDING TO HEATHER BRIDLE, GIRLFRIEND, A TRUE AND ATTESTED
COPY OF THE ORIGINAL WRIT AND MADE KNOWN TO THEM THE CONTENTS THEREOF.

SO ANSWERS,

SWORN AND SUBSCRIBED BEFORE ME
THIS WEDNESDAY, MAY 18, 2005


NOTARY PUBLIC

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



X
TIMOTHY T. CHAMBERLAIN
SHERIFF

X 
P. D'ANGELO
DEPUTY SHERIFF

COLUMBIA COUNTY SHERIFF'S OFFICE

PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN
DATE RECEIVED 5/6/2005

SERVICE# 1 - OF - 13 SERVICES
DOCKET # 56ED2005

PLAINTIFF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS
TRUSTEE

DEFENDANT ROBERT G. PIERCE, AKA ROBERT GERALD PIERCE, JR.,
AKA ROBERT G. PIERCE, JR.
KAREN PIERCE, AKA KAREN A. PIERCE
ATTORNEY FIRM FEDERMAN & PHELAN

PERSON/CORP TO SERVED
ROBERT PIERCE JR.
214 E. 6TH ST.
BERWICK

PAPERS TO SERVED
WRIT OF EXECUTION - MORTGAGE
FORECLOSURE

SERVED UPON HEATHER BAILEY

RELATIONSHIP CHILD FRIEND IDENTIFICATION _____

DATE 05/11/05 TIME 0945 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
DATE

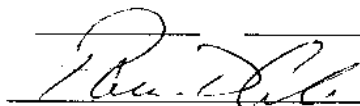
TIME

OFFICER

REMARKS

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

DEPUTY



DATE 05/11/05

COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN
DATE RECEIVED 5/6/2005

SERVICE# 2 - OF - 13 SERVICES
DOCKET # 56ED2005

PLAINTIFF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS
TRUSTEE

DEFENDANT ROBERT G. PIERCE, AKA ROBERT GERALD PIERCE, JR.,
AKA ROBERT G. PIERCE, JR.
KAREN PIERCE, AKA KAREN A. PIERCE

ATTORNEY FIRM FEDERMAN & PHELAN

PERSON/CORP TO SERVED
KAREN PIERCE
214 E. 6TH ST.
BERWICK

PAPERS TO SERVED
WRIT OF EXECUTION - MORTGAGE
FORECLOSURE

1200 1st AV.

1st AV.

20000000

"C"

SERVED UPON KAREN PIERCE

RELATIONSHIP _____ IDENTIFICATION _____

DATE 05.11.05 TIME 1045 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) 1200 1st AV APT C

ATTEMPTS
DATE

TIME

OFFICER

REMARKS

DEPUTY

DATE

05.11.05

COLUMBIA COUNTY SHERIFF'S OFFICE

PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN
DATE RECEIVED 5/6/2005

SERVICE# 3 - OF - 13 SERVICES
DOCKET # 56ED2005

PLAINTIFF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE

DEFENDANT ROBERT G. PIERCE, AKA ROBERT GERALD PIERCE, JR.,
AKA ROBERT G. PIERCE, JR.
KAREN PIERCE, AKA KAREN A. PIERCE

ATTORNEY FIRM FEDERMAN & PHELAN

PERSON/CORP TO SERVED	PAPERS TO SERVED
TENANT(S)	WRIT OF EXECUTION - MORTGAGE
410 E. 8TH ST.	FORECLOSURE
BERWICK	

SERVED UPON POSTED - PREMISES VACANT

RELATIONSHIP _____ IDENTIFICATION _____

DATE 05.11.05 TIME 0955 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
DATE

TIME

OFFICER

REMARKS

DEPUTY

Pau [Signature]

DATE

05.11.05

COLUMBIA COUNTY SHERIFF'S OFFICE

PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN
DATE RECEIVED 5/6/2005

SERVICE# 5 - OF - 13 SERVICES
DOCKET # 56ED2005

PLAINTIFF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS
TRUSTEE

DEFENDANT ROBERT G. PIERCE, AKA ROBERT GERALD PIERCE, JR.,
AKA ROBERT G. PIERCE, JR.
KAREN PIERCE, AKA KAREN A. PIERCE

ATTORNEY FIRM FEDERMAN & PHELAN

PERSON/CORP TO SERVED	PAPERS TO SERVED
CONNIE GINGHER- TAX COLLECTOR	WRIT OF EXECUTION - MORTGAGE
1615 LINCOLN AVE.	FORECLOSURE
BERWICK	

SERVED UPON CONNIE GINGHER

RELATIONSHIP _____ IDENTIFICATION _____

DATE 05-11-05 TIME 0940 MILEAGE _____ OTHER _____

Race _____ Sex _____ Height _____ Weight _____ Eys _____ 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

Ran Dell

DATE 05-11-05

COLUMBIA COUNTY SHERIFF'S OFFICE

PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN
DATE RECEIVED 5/6/2005

SERVICE# 6 - OF - 13 SERVICES
DOCKET # 56ED2005

PLAINTIFF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS
TRUSTEE

DEFENDANT ROBERT G. PIERCE, AKA ROBERT GERALD PIERCE, JR.,
AKA ROBERT G. PIERCE, JR.
KAREN PIERCE, AKA KAREN A. PIERCE
ATTORNEY FIRM FEDERMAN & PHELAN

PERSON/CORP TO SERVED	PAPERS TO SERVED
BERWICK SEWER	WRIT OF EXECUTION - MORTGAGE
1108 FREAS AVE.	FORECLOSURE
BERWICK	

SERVED UPON KELLY GERR

RELATIONSHIP CLERK IDENTIFICATION _____

DATE 05.11.05 TIME 0920 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
DATE

TIME

OFFICER

REMARKS

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

DEPUTY

Paul D. Clark

DATE 05.11.05

COLUMBIA COUNTY SHERIFF'S OFFICE

PROCESS SERVICE ORDER

OFFICER:
DATE RECEIVED 5/6/2005

SERVICE# 7 - OF - 13 SERVICES
DOCKET # 56ED2005

PLAINTIFF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS
TRUSTEE

DEFENDANT ROBERT G. PIERCE, AKA ROBERT GERALD PIERCE, JR.,
AKA ROBERT G. PIERCE, JR.
KAREN PIERCE, AKA KAREN A. PIERCE
ATTORNEY FIRM FEDERMAN & PHELAN

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

PAPERS TO SERVED
WRIT OF EXECUTION - MORTGAGE
FORECLOSURE

SERVED UPON Legis. Council

RELATIONSHIP _____ IDENTIFICATION _____

DATE 5-11-5 TIME 0845 MILEAGE _____ OTHER _____

Race _____ Sex _____ Height _____ Weight _____ Eyes _____ Hair _____ Age _____ Military _____

TYPE OF SERVICE: A. PERSONAL SERVICE AT POA _____ POB A 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 5-11-5

COLUMBIA COUNTY SHERIFF'S OFFICE

PROCESS SERVICE ORDER

OFFICER:
DATE RECEIVED 5/6/2005

SERVICE# 10 - OF - 13 SERVICES
DOCKET # 56ED2005

PLAINTIFF DEUTSCHE BANK NATIONAL TRUST COMPANY, AS
TRUSTEE

DEFENDANT ROBERT G. PIERCE, AKA ROBERT GERALD PIERCE, JR.,
AKA ROBERT G. PIERCE, JR.
KAREN PIERCE, AKA KAREN A. PIERCE
ATTORNEY FIRM FEDERMAN & PHELAN

PERSON/CORP TO SERVED
COLUMBIA COUNTY TAX CLAIM
PO BOX 380
BLOOMSBURG

PAPERS TO SERVED
WRIT OF EXECUTION - MORTGAGE
FORECLOSURE

SERVED UPON DEB MILLER

RELATIONSHIP _____ IDENTIFICATION _____

DATE 5-11-5 TIME 0825 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
DATE

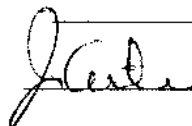
TIME

OFFICER

REMARKS

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

DEPUTY



DATE 5-11-5

BERWICK BORO

Connie C Gingher
1615 Lincoln Avenue
Berwick PA 18603

CLOSED WEDNESDAY & HOLIDAYS
CLOSED FRIDAY AFTER DISCOUNT

PHONE:570-752-7442

DATE
03/01/2005

BILL NO.
5426

DESCRIPTION	ASSESSMENT	MILLS	LESS DISCOUNT	AX AMOUNT DUE	INCL. PENALTY
GENERAL	15,842	5.646	87.65	89.44	98.38
SINKING		1.345	20.88	21.31	23.44
LIGHT		.75	11.64	11.88	12.47
FIRE		1.75	27.17	27.72	29.11
BORO RE		6.6	102.47	104.56	109.79
The discount & penalty have been calculated for your convenience	PAY THIS AMOUNT		249.81 April 30 If paid on or before	254.91 June 30 If paid on or before	273.19 June 30 If paid after

PIERCE ROBERT G & KAREN JR
214 EAST 6TH STREET
BERWICK PA 18603

THIS TAX NOTICE MUST BE RETURNED WITH YOUR PAYMENT

FILE COPY

COUNTY OF COLUMBIA
REAL ESTATE TAX LIEN CERTIFICATE

DATE: 11-MAY-05

FEE: \$5.00

CERT. NO: 837

PIERCE ROBERT G & KAREN JR
214 EAST 6TH STREET
BERWICK PA 18603

DISTRICT: BERWICK BORO
DEED
LOCATION: 410 E 8TH ST LOT 5
PARCEL: 04A-09 -084-00,000

YEAR	BILL ROLL	AMOUNT	INTEREST	PENDING	COSTS	TOTAL AMOUNT DUE
2003	PRIM	0.00	0.00		0.00	0.00
2004	PRIM	0.00	0.00		0.00	0.00
TOTAL DUE :						\$0.00

TAX CLAIM TOTAL AMOUNT DUE DURING THE MONTH OF: July , 2005

THIS IS TO CERTIFY THAT, ACCORDING TO OUR RECORDS, TAX LIENS AS OF
DECEMBER 31, 2004

REQUESTED BY:

Timothy T. Chamberlain, Sheriff
dm.



May 11, 2005

Timothy T. Chamberlain
Sheriff of Columbia County
Court House- P.O. Box 380
Bloomsburg, PA 17815

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE

VS

**ROBERT G. PIERCE, AKA ROBERT GERALD PIERCE, JR. AKA
ROBERT G. PIERCE, JR.
KAREN PIERCE, AKA KAREN A. PIERCE**

DOCKET # 56ED2005

JD # 321JD2005

Dear Timothy:

The balance on sewer account #108644 for the property located at 410 East 8th Street, Berwick through July 2005 is \$386.41.

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

Sincerely,

Kelly Greer
Authority Clerk

1108 Freas Avenue • Berwick, Pennsylvania 18603

Phone: (570) 752-8477 • Fax: (570) 752-8479

REAL ESTATE OUTLINE

ED # 56-05

DATE RECEIVED 5-6-05
DOCKET AND INDEX 5-10-05
SET FILE FOLDER UP 5-16-05

CHECK FOR PROPER INFO.

WRIT OF EXECUTION ✓
COPY OF DESCRIPTION ✓
WHEREABOUTS OF LKA ✓
NON-MILITARY AFFIDAVIT ✓
NOTICES OF SHERIFF SALE ✓
WATCHMAN RELEASE FORM ✓
AFFIDAVIT OF LIENS LIST ✓
CHECK FOR \$1,350.00 OR ✓ CK# 424503

****IF ANY OF ABOVE IS MISSING DO NOT PROCEED****

SALE DATE July 13, 2005 TIME 0930
POSTING DATE June 8, 05
ADV. DATES FOR NEWSPAPER
1ST WEEK June 22
2ND WEEK 29
3RD WEEK July 6, 05

SHERIFF'S SALE

WEDNESDAY JULY 13, 2005 AT 9:30 AM

BY VIRTUE OF A WRIT OF EXECUTION NO. 56 OF 2005 ED AND CIVIL WRIT NO. 321 OF 2005 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'S 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 and parcel of land situate in the Borough of Berwick, County of Columbia and State of Pennsylvania bounded and described as follows, to wit:

BEGINNING at a point on the South side of Eighth Street East of Walnut, at the corner of Lot No. 3; thence 165 feet South along Lot No. 3 to Seventh Street; thence East along Seventh Street 49.5 feet to the corner of Lot No. 7; thence North along the line of Lot No. 7, 165 feet to Eighth Street; thence West along Eighth Street 49.5 feet to the corner of Lot No. 3; the place of beginning.

BEING THE SAME premises which Cathy J. Maneval and William J. Maneval, husband and wife by Deed dated 10/11/1996 and recorded 10/11/1996 in the County of Columbia in Deed Book 638, Page 1020 conveyed unto Robert G. Pierce, Jr. and Karen Pierce, husband and wife, in fee.

Tax Parcel #O4A-09-084

Premises Being: 410 East 8th Street, Berwick, PA 18603

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
Daniel G. Schmieg
1617 John F. Kennedy Blvd
Philadelphia, PA 19103

Sheriff of Columbia County
Timothy T. Chamberlain
www.sheriffofcolumbiacounty.com

SHERIFF'S SALE

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Plaintiff's Attorney
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1617 John F. Kennedy Blvd
Philadelphia, PA 19103

Sheriff of Columbia County
Timothy T. Chamberlain
www.sheriffofcolumbiacounty.com

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Tax Parcel #O4A-09-084

Premises Being: 410 East 8th Street, Berwick, PA 18603

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Plaintiff's Attorney
Daniel G. Schmieg
1617 John F. Kennedy Blvd
Philadelphia, PA 19103

Sheriff of Columbia County
Timothy T. Chamberlain
www.sheriffofcolumbiacounty.com

WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)
P.R.C.P. 3180-3183 and RULE 2357

**DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE**

Plaintiff

vs.

**ROBERT G. PIERCE, A/K/A ROBERT
GERALD PIERCE, JR., A/K/A ROBERT
G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A.
PIERCE**

Defendant(s)

**: COURT OF COMMON PLEAS
: COLUMBIA COUNTY, PA**

: NO: 321CV2005

**: WRIT OF EXECUTION
: (MORTGAGE FORECLOSURE)**

Writ

2005 ED 56

TO THE SHERIFF OF COLUMBIA COUNTY, PENNSYLVANIA

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

Premises: 410 EAST 8TH STREET
BERWICK, PA 18603

(see attached legal description)

Amount Due \$63,070.95

Interest from 4/30/05 \$ _____
to sale date
(per diem-\$10.37)

Total \$ _____ Plus Costs as endorsed.

Clerk *Lami B. Kline*
Office of the Prothonotary
Common Pleas Court of
Columbia County, PA

Dated: *May 4, 2005*
(Seal)

ALL THAT CERTAIN piece and parcel of land situate in the Borough of Berwick, County of Columbia and State of Pennsylvania, bounded and described as follows, to wit:

BEGINNING at a point on the South side of Eighth Street East of Walnut, at the corner of Lot No. 3; thence 165 feet South along Lot No. 3 to Seventh Street; thence East along Seventh Street 49.5 feet to the corner of Lot No. 7; thence North along the line of Lot No. 7, 165 feet to Eighth Street; thence West along Eighth Street 49.5 feet to the corner of Lot No. 3; the place of beginning.

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Tax Parcel #04A-09-084

Premises Being: 410 East 8th Street, Berwick, PA 18603

WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)
P.R.C.P. 3180-3183 and RULE 2357

**DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE**

Plaintiff

vs.

**ROBERT G. PIERCE, A/K/A ROBERT
GERALD PIERCE, JR., A/K/A ROBERT
G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A.
PIERCE**

Defendant(s)

**: COURT OF COMMON PLEAS
: COLUMBIA COUNTY, PA**

: NO: 321CV2005

**: WRIT OF EXECUTION
: (MORTGAGE FORECLOSURE)**

Writ

2005 ED 56

TO THE SHERIFF OF COLUMBIA COUNTY, PENNSYLVANIA

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

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(see attached legal description)

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to sale date
(per diem-\$10.37)

Total \$ _____ Plus Costs as endorsed.

Clerk *Lami B. Kleve*
Office of the Prothonotary
Common Pleas Court of
Columbia County, PA

Dated: *May 4, 2005*
(Seal)

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Tax Parcel #04A-09-084

Premises Being: 410 East 8th Street, Berwick, PA 18603

Phelan Hallinan & Schmieg, L.L.P.
By: DANIEL G. SCHMIEG
Identification No. 62205
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL
TRUST COMPANY, AS TRUSTEE

Plaintiff

vs.

ROBERT G. PIERCE, A/K/A ROBERT
GERALD PIERCE, JR., A/K/A
ROBERT G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A.
PIERCE

Defendant(s)

: COLUMBIA County
:
: Court of Common Pleas
:
: CIVIL DIVISION
:
: NO. 321CV2005
:
:
:

CERTIFICATION

DANIEL G. SCHMIEG, 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 Mortgage
- ☐ non-owner occupied
- ☐ vacant
- ☒ Act 91 procedures have been fulfilled

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


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Phelan Hallinan & Schmieg, L.L.P.
By: DANIEL G. SCHMIEG
Identification No. 62205
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL
TRUST COMPANY, AS TRUSTEE

Plaintiff

vs.

ROBERT G. PIERCE, A/K/A ROBERT
GERALD PIERCE, JR., A/K/A
ROBERT G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A.
PIERCE

Defendant(s)

: COLUMBIA County
:
: Court of Common Pleas
:
: CIVIL DIVISION
:
: NO. 321CV2005
:
:
:

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- ☐ non-owner occupied
- ☐ vacant
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DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

Phelan Hallinan & Schmieg, L.L.P.
By: DANIEL G. SCHMIEG
Identification No. 62205
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
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(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE

Plaintiff

vs.

ROBERT G. PIERCE, A/K/A ROBERT
GERALD PIERCE, JR., A/K/A ROBERT G.
PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A.
PIERCE

Defendant(s)

AFFIDAVIT PURSUANT TO RULE 3129

(Affidavit No. I)

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, Plaintiff in the above action, by its attorney, DANIEL G. SCHMIEG, 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 **410 EAST 8TH STREET, BERWICK, PA 18603**.

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

NAME

LAST KNOWN ADDRESS (if address cannot be
reasonably ascertained, please so indicate)

ROBERT G. PIERCE, A/K/A ROBERT
GERALD PIERCE, JR., A/K/A ROBERT
G. PIERCE, JR.

214 EAST 6TH STREET
BERWICK, PA 18603

KAREN PIERCE, A/K/A KAREN A. PIERCE

214 EAST 6TH STREET
BERWICK, PA 18603

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

NAME

LAST KNOWN ADDRESS (if address cannot be
reasonably ascertained, please so indicate)

SAME AS ABOVE

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.


DANIEL G. SCHMIEG, ESQUIRE

Date: 4/29/05

Phelan Hallinan & Schmieg, L.L.P.

By: DANIEL G. SCHMIEG
Identification No. 62205
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE

Plaintiff

vs.

ROBERT G. PIERCE, A/K/A ROBERT GERALD
PIERCE, JR., A/K/A ROBERT G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A. PIERCE

Defendant(s)

: COLUMBIA County
:
: Court of Common Pleas
:
: CIVIL DIVISION
:
: NO. 321CV2005
:
:
:

AFFIDAVIT PURSUANT TO RULE 3129.1

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, Plaintiff in the above action, by its attorney, DANIEL G. SCHMIEG, 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 **410 EAST 8TH STREET, BERWICK, PA 18603**.

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NAME

LAST KNOWN ADDRESS

ROBERT G. PIERCE, A/K/A ROBERT GERALD PIERCE, JR., A/K/A ROBERT G. PIERCE, JR.
214 EAST 6TH STREET
BERWICK, PA 18603

KAREN PIERCE,
A/K/A KAREN A. PIERCE

214 EAST 6TH STREET
BERWICK, PA 18603

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

NAME

LAST KNOWN 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

LAST KNOWN ADDRESS

NONE

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

NAME

LAST KNOWN ADDRESS

NONE

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

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:

NONE

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:

**DOMESTIC RELATIONS OF
COLUMBIA COUNTY**

**COLUMBIA COUNTY COURTHOUSE
P.O. Box 380
Bloomsburg, PA 17815**


TENANT/OCCUPANT

**410 EAST 8TH STREET
BERWICK, PA 18603**

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF WELFARE**

**P.O. BOX 2675
HARRISBURG, PA 17105**

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. Section 4904 relating to unsworn falsification to authorities.


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

DATE: **4/29/05**

Phelan Hallinan & Schmieg, L.L.P.

By: DANIEL G. SCHMIEG

Identification No. 62205

One Penn Center at Suburban Station

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Suite 1400

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(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE

Plaintiff

vs.

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GERALD PIERCE, JR., A/K/A ROBERT G.
PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A.
PIERCE

Defendant(s)

: COLUMBIA County
:
: Court of Common Pleas
:
: CIVIL DIVISION
:
: NO. 321CV2005
:

AFFIDAVIT PURSUANT TO RULE 3129

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G. PIERCE, JR.

214 EAST 6TH STREET
BERWICK, PA 18603

KAREN PIERCE, A/K/A KAREN A. PIERCE

214 EAST 6TH STREET
BERWICK, PA 18603


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

NAME

LAST KNOWN ADDRESS (if address cannot be
reasonably ascertained, please so indicate)

SAME AS ABOVE

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.


DANIEL G. SCHMIEG, ESQUIRE

Date: 4/29/05

Phelan Hallinan & Schmieg, L.L.P.

By: DANIEL G. SCHMIEG
Identification No. 62205
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE

Plaintiff

vs.

ROBERT G. PIERCE, A/K/A ROBERT GERALD
PIERCE, JR., A/K/A ROBERT G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A. PIERCE

Defendant(s)

: COLUMBIA County
:
: Court of Common Pleas
:
: CIVIL DIVISION
:
: NO. 321CV2005
:
:
:

AFFIDAVIT PURSUANT TO RULE 3129.1

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, Plaintiff in the above action, by its attorney, DANIEL G. SCHMIEG, 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 **410 EAST 8TH STREET, BERWICK, PA 18603**.

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

NAME

LAST KNOWN ADDRESS

ROBERT G. PIERCE, A/K/A ROBERT GERALD PIERCE, JR., A/K/A ROBERT G. PIERCE, JR.
214 EAST 6TH STREET
BERWICK, PA 18603

KAREN PIERCE,
A/K/A KAREN A. PIERCE

214 EAST 6TH STREET
BERWICK, PA 18603

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

NAME

LAST KNOWN 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

LAST KNOWN ADDRESS

NONE

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

NAME

LAST KNOWN ADDRESS

NONE

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

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:

NONE

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:

**DOMESTIC RELATIONS OF
COLUMBIA COUNTY**

**COLUMBIA COUNTY COURTHOUSE
P.O. Box 380
Bloomsburg, PA 17815**


TENANT/OCCUPANT

**410 EAST 8TH STREET
BERWICK, PA 18603**

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF WELFARE**

**P.O. BOX 2675
HARRISBURG, PA 17105**

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. Section 4904 relating to unsworn falsification to authorities.


DANIEL G. SCHMIEG, ESQUIRE
Attorney for Plaintiff

DATE: 4/29/05

PHELAN HALLINAN & SCHMIEG, L.L.P.

Suite 1400

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard

Philadelphia, PA 19103-1814

215-563-7000

Fax: 215-563-5534

Katherine Trautz
Ext. 1493

Representing Lenders in
Pennsylvania and New Jersey

4/29/05

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

RE: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE

vs.

**ROBERT G. PIERCE, A/K/A ROBERT GERALD PIERCE, JR., A/K/A ROBERT
G. PIERCE, JR.**

KAREN PIERCE, A/K/A KAREN A. PIERCE

COLUMBIA- No. 321CV2005

Action in Mortgage Foreclosure

Premises: 410 EAST 8TH STREET

BERWICK, PA 18603

Dear Sir/Madam:

I would appreciate your entering Default Judgment in the above captioned matter, 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 Sheriff's Sale list for the next available Sheriff's sale.

All of the necessary documents are enclosed, together with our check to your order in the amount of \$37.00, and the check to the order of the Sheriff in the amount of \$1,200.00 payment of fees and costs. Kindly send me your receipt and a stamped copy of the Praeceptum for Judgment in the envelope I have provided.

Thank you and please contact me if you have any questions regarding this matter.

Very truly yours,



Katherine Trautz
for PHELAN HALLINAN & SCHMIEG

KJM
Enclosures

Phelan Hallinan & Schmieg, L.L.P.
By: DANIEL G. SCHMIEG
Identification No. 62205
One Penn Center at Suburban Station
1617 John F. Kennedy Boulevard
Suite 1400
Philadelphia, PA 19103-1814
(215) 563-7000

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE

Plaintiff

vs.

ROBERT G. PIERCE, A/K/A ROBERT GERALD
PIERCE, JR., A/K/A ROBERT G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A. PIERCE

Defendant(s)

: COLUMBIA County
:
: Court of Common Pleas
:
: CIVIL DIVISION
:
: NO. 321CV2005
:
:
:
:

****THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A
DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR
THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A
DISCHARGE IN BANKRUPTCY, THIS IS NOT AND SHOULD NOT BE
CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT
ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.****

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

4/29/05

**TO: ROBERT G. PIERCE, A/K/A ROBERT GERALD PIERCE, JR., A/K/A ROBERT G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A. PIERCE
214 EAST 6TH STREET
BERWICK, PA 18603**

Your house (real estate) at **410 EAST 8TH STREET, BERWICK, PA 18603**, is scheduled to be sold at the Sheriff's Sale on _____, at _____ in the **Sheriff's Office, Columbia County Courthouse, P.O. 380, Bloomsburg, PA 17815** to enforce the court judgment of **\$63,070.95** obtained by **DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE** (the mortgagee) against you. In the event the sale is continued, an announcement will be made at said sale in compliance with Pa.R.C.P., Rule 3129.3.

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) 563-7000.

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) 563-7000.

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 (814) 272-9350.

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 proposed schedule of distribution of the money bid for your house will be prepared by the Sheriff not later than thirty (30) days after the sale. The schedule shall be kept on file with the Sheriff and will be made available for inspection in his office. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after the filing of the proposed schedule.

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.

**COLUMBIA COUNTY
SUSQUEHANNA LEGAL SERVICES
168 E. 5th STREET,
BLOOMSBURG, PA 17815
(570) 784-8760**

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BEING THE SAME premises which Cathy J. Maneval and William J. Maneval, husband and wife by Deed dated 10/11/1996 and recorded 10/11/1996 in the County of Columbia in Deed Book 638, Page 1020 conveyed unto Robert G. Pierce, Jr. and Karen Pierce, husband and wife, in fee.

Tax Parcel #04A-09-084

Premises Being: 410 East 8th Street, Berwick, PA 18603

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 o 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.

D. Schuy (SEAL)
(Attorney for Plaintiff(s))

WAIVER OF INSURANCE - Now, _____, 20____, the Sheriff is hereby released from all liability to protect the property described in the within named execution by insurance, which insurance is hereby waived.

D. Schuy (SEAL)
(Attorney for Plaintiff(s))

HARRY A. ROADARMEL

COLUMBIA County, Pa.

Sheriff

Sir: — There will be placed in

your hands

for service a Writ ofEXECUTION (REAL ESTATE)....., styled as

follows: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE vs ROBERT G. PIERCE, A/K/A ROBERT GERALD PIERCE, JR., A/K/A ROBERT G. PIERCE, JR. and KAREN PIERCE, A/K/A KAREN A. PIERCE

The defendant will be found at 214 EAST 6TH STREET, BERWICK, PA 18603

.....Attorney for Plaintiff

If Writ of Execution, state below where defendants will be found, what foods and chattels shall/ be seized and be levied upon. If real estate, attach five double spaced typed written copies of description as it shall appear on the new deed together with Street and Number of the premises.

Please do not furnish us with the old deed or mortgage.

Sec attached legal description.....

.....
.....
.....

....., 20

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D. Schuy (SEAL)
(Attorney for Plaintiff(s))

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D. Schling (SEAL)
(Attorney for Plaintiff(s))

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D. Schwing (SEAL)
(Attorney for Plaintiff(s))

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D. Schwing (SEAL)
(Attorney for Plaintiff(s))

_____, 20____

HARRY A. ROADARMEL

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COLUMBIA County, Pa.

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See attached legal description.....

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.....
.....

SHERIFF'S RETURN OF SERVICE-COLUMBIA COUNTY

PLAINTIFF

**DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE**

DEFENDANT

**ROBERT G. PIERCE, A/K/A ROBERT GERALD
PIERCE, JR., A/K/A ROBERT G. PIERCE, JR.
KAREN PIERCE, A/K/A KAREN A. PIERCE**

COURT NO.: 321CV2005

SERVE AT:

**410 EAST 8TH STREET
BERWICK, PA 18603**

a)TYPE OF ACTION

XX Notice of Sheriff's Sale

SALE DATE: _____

PLEASE POST THE HANDBILL.

SERVED

Served and made known to _____, Defendant, on the ____ day of _____, 200__, at __, o'clock __. M., at _____, Commonwealth of Pennsylvania, in the manner described below:

____ Defendant personally served.

____ Adult family member with whom Defendant(s) reside(s).

Relationship is _____.

____ Adult in charge of Defendant's residence who refused to give name or relationship.

____ Manager/Clerk of place of lodging in which Defendant(s) reside(s).

____ Agent or person in charge of Defendant's office or usual place of business.

____ an officer of said Defendant's company.

____ Other: _____.

Description: Age _____ Height _____ Weight _____ Race _____ Sex _____ Other _____

SHERIFF

By: _____ Deputy Sheriff

On the ____ day of _____, 200__, at ____ o'clock __. M., Defendant NOT FOUND because:

____ Moved ____ Unknown ____ No Answer ____ Vacant

Other: _____

SHERIFF

By: _____ Deputy Sheriff

I. DEPUTIZED SERVICE

Now, this ____ day of _____, 200__, I, Sheriff of CLINTON County, Pennsylvania, do hereby deputize the Sheriff of ____ County to serve this Notice of Sheriff's Sale and make return thereof and according to law.

SHERIFF

By: _____ Deputy Sheriff

ATTORNEY FOR PLAINTIFF

DANIEL G. SCHMIEG, ESQUIRE

I.D.#62205

One Penn Center at Suburban Station

1617 John F. Kennedy Boulevard

Suite 1400

Philadelphia, PA 19103-1814

(215)563-7000

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BEING THE SAME premises which Cathy J. Maneval and William J. Maneval, husband and wife by Deed dated 10/11/1996 and recorded 10/11/1996 in the County of Columbia in Deed Book 638, Page 1020 conveyed unto Robert G. Pierce, Jr. and Karen Pierce, husband and wife, in fee.

Tax Parcel #04A-09-084

Premises Being: 410 East 8th Street, Berwick, PA 18603

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ORIGINAL DOCUMENT PRINTED ON CHEMICAL RESISTANT PAPER WITH MICROPRINTED BORDER
PHELAN HALLINAN & SCHMIEG LLP
ATTORNEY ESCROW ACCOUNT
ONE PENN CENTER, SUITE 1400
PHILADELPHIA, PA 19103-1814

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