

# SHERIFF'S SALE COST SHEET

Citi mortgage vs. Yellins  
 NO. 175-08 ED NO. 1612-06 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>30.00</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	\$ <u>35.00</u>
TRANSFER TAX FORM	\$ <u>25.00</u>
DISTRIBUTION FORM	\$ <u>25.00</u>
COPIES	\$ <u>6.00</u>
NOTARY	\$ <u>15.00</u>
TOTAL ***** \$ <u>341.50</u>	

WEB POSTING	\$150.00
PRESS ENTERPRISE INC.	\$ <u>129.50</u>
SOLICITOR'S SERVICES	\$ <u>75.00</u>
TOTAL ***** \$ <u>1279.50</u>	

PROTHONOTARY (NOTARY)	\$ <u>10.00</u>
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. <u>Ms.</u>	\$ <u>30.00</u>
TOTAL ***** \$ <u>30.00</u>	

TOTAL COSTS (OPENING BID) \$ 1779.00

Refund \$ 221.00

# SHERIFF'S SALE COST SHEET

Citizens vs. Bailey & Dale King  
 NO. 175-08 ED NO. 1612-06 JD DATE/TIME OF SALE Feb. 4 1000

DOCKET/RETURN	\$15.00	
SERVICE PER DEF.	\$180.00	
LEVY (PER PARCEL	\$15.00	
MAILING COSTS	\$30.00	
ADVERTISING SALE BILLS & COPIES	\$17.50	
ADVERTISING SALE (NEWSPAPER)	\$15.00	
MILEAGE	\$12.00	
POSTING HANDBILL	\$15.00	
CRYING/ADJOURN SALE	\$10.00	
SHERIFF'S DEED	\$35.00	
TRANSFER TAX FORM	\$25.00	
DISTRIBUTION FORM	\$25.00	
COPIES	\$6.00	
NOTARY	\$15.00	
TOTAL *****		\$ <u>718.50</u>

WEB POSTING	\$150.00	
PRESS ENTERPRISE INC.	\$1129.50	
SOLICITOR'S SERVICES	\$75.00	
TOTAL *****		\$ <u>1354.50</u>

PROTHONOTARY (NOTARY)	\$10.00	
RECORDER OF DEEDS	\$41.50	
TOTAL *****		\$ <u>51.50</u>

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

MUNICIPAL FEES DUE:		
SEWER 20	\$286.02	
WATER 20	\$	
TOTAL *****		\$ <u>286.02</u>

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

TOTAL COSTS (OPENING BID) \$ 2246.52

**GOLDBECK McCAFFERTY & McKEEVER  
A PROFESSIONAL CORPORATION  
SUITE 5000 - MELLON INDEPENDENCE CENTER  
701 MARKET STREET  
PHILADELPHIA, PA 19106-1532  
(215) 627-1322  
FAX (215) 627-7734**

April 21, 2009

Columbia

Timothy T. Chamberlain  
SHERIFF OF COLUMBIA COUNTY  
Sheriff's Office  
PO Box 380  
Bloomsburg, PA 17815  
FAX 570-389-5625

**BOOK WRIT**

RE: CITIMORTGAGE INC.  
vs.  
BARBARA J. YOUNG and DALE R. YOUNG  
Term No. 2006-CV-1612

**Property address:**

*1044 West Street  
Mifflinville, PA 18631*

Sheriff's Sale Date: May 27, 2009

Dear Sir/Madam:

Kindly stay the Sheriff's Sale with reference to the above-captioned matter and return any unused costs. I collected \$ 1500.00 towards my client's debt.

Thank you for your cooperation.

Very truly yours,

  
MICHAEL T. MCKEEVER

MTM/jlb

cc: Dawn Schwentker  
CITIMORTGAGE INC.

**GOLDBECK McCAFFERTY & McKEEVER  
A PROFESSIONAL CORPORATION  
SUITE 5000 - MELLON INDEPENDENCE CENTER  
701 MARKET STREET  
PHILADELPHIA, PA 19106-1532  
(215) 627-1322  
FAX (215) 627-7734**

March 9, 2009

Columbia

Timothy T. Chamberlain  
SHERIFF OF COLUMBIA COUNTY  
Sheriff's Office  
PO Box 380  
Bloomsburg, PA 17815  
FAX 570-389-5625

**BOOK WRIT**

RE: CITIMORTGAGE INC.  
vs.  
BARBARA J. YOUNG and DALE R. YOUNG  
Term No. 2006-CV-1612

**Property address:**

*1044 West Street  
Mifflinville, PA 18631*

**Sheriff's Sale Date: March 25, 2009**

Dear Sir/Madam:

Kindly postpone the above-captioned Sheriff's Sale scheduled for March 25, 2009 to May 27, 2009.

This is a second postponement as allowed pursuant to Pa. R.C.P 3129.3(b) amended effective January 1, 2007.

Thank you for your cooperation.

Very truly yours,



Michael T. McKeever

MTM/JLG

cc: Dawn Schwenker  
CITIMORTGAGE INC.  
Acct. #2001993520

**Timothy Chamberlain**

**From:** Joyce Garcia [JGarcia@goldbecklaw.com]  
**Sent:** Tuesday, February 03, 2009 12:28 PM  
**To:** Timothy Chamberlain  
**Subject:** sheriff's sale postponed - young

**GOLDBECK McCAFFERTY & McKEEVER**  
**A PROFESSIONAL CORPORATION**  
**SUITE 5000 - MELLON INDEPENDENCE CENTER**  
**701 MARKET STREET**  
**PHILADELPHIA, PA 19106-1532**  
**(215) 627-1322**  
**FAX (215) 627-7734**

February 3, 2009

Columbia

Timothy T. Chamberlain  
SHERIFF OF COLUMBIA COUNTY  
Sheriff's Office  
PO Box 380  
Bloomsburg, PA 17815  
FAX 570-389-5625

**BOOK WRIT**

RE: CITIMORTGAGE INC.  
vs.  
BARBARA J. YOUNG and DALE R. YOUNG  
Term No. 2006-CV-1612

**Property address:**

**1044 West Street**  
**Mifflinville, PA 18631**

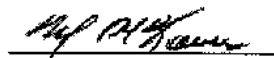
**Sheriff's Sale Date: February 04, 2009**

Dear Sir/Madam:

Kindly postpone the above-captioned Sheriff's Sale scheduled for February 04, 2009 to March 25, 2009.

Thank you for your cooperation.

Very truly yours,



Michael T. McKeever

MTM/jlg

cc: Dawn Schwenker  
CITIMORTGAGE INC.  
Acct. #2001993520

2/3/2009

February 2, 2009

**Via Federal Express**  
**Telephone: (570) 389-5614**

Pennsylvania Court of Common Pleas for Columbia County  
Prothonotary  
35 West Main Street  
Bloomsburg, PA 17815

**Re: CitiMortgage Inc. v. Barbara J. Young and Dale R. Young**  
**No.: 2006-CV-1612, 2008-ED-175, Mortgage Foreclosure**  
**Tax Parcel No.: 23-05F-028-05**  
**Defendant's Emergency Petition to Postpone Sheriff's Sale**

Dear Sir/Madam:

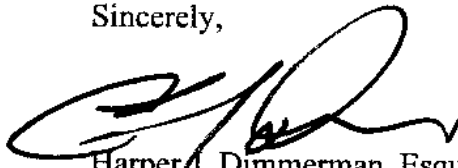
Enclosed please find Defendants' Emergency Petition to Postpone Sheriff's Sale in the above matter.

The sale is scheduled for **Wednesday, February 4, 2009 at 10:00 AM**. As such, we are requesting an *Emergency Hearing* on Tuesday, February 3, 2009. The Honorable Thomas A. James, Jr. has agreed that counsel for the parties may testify telephonically. My cell phone number is (267) 968-5000 and will be available anytime tomorrow as time is obviously of the essence.

Additionally, I have enclosed my Entry of Appearance and the requisite filing fee, in the amount of \$20.00 (check 5788).

Kindly return time-stamped copies of both the Petition and Entry of Appearance in the enclosed self-addressed stamped envelope.

Sincerely,



Harper J. Dimmerman, Esquire

HJD:ns

Enclosures

cc: Courtenay R. Dunn, Esq. (w/ Enclosures, via Hand Delivery and Electronic Mail)

Sheriff of Columbia County (w/ Enclosures, via Federal Express,  
Telephone: (570) 389-5622

THE LAW OFFICE OF HARPER J. DIMMERMAN P.C.  
BY: HARPER J. DIMMERMAN, ESQUIRE  
Identification No. 89572  
1835 Market Street, Suite 2700  
Philadelphia, PA 19103  
Telephone: (215) 545-0600  
Facsimile: (215) 735-1011

*Attorney for Defendants*

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

*Plaintiff,*

v.

BARBARA J. YOUNG  
DALE R. YOUNG  
1044 West Street  
Mifflinville, PA 18631

*Defendants.*

COURT OF COMMON PLEAS  
COLUMBIA COUNTY

No.: 2006-CV-1612

2008-ED-175

MORTGAGE FORECLOSURE

Tax Parcel No.: 23-05F-028-05

**ENTRY OF APPEARANCE**

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of **BARBARA J. YOUNG** and **DALE R. YOUNG**, the Defendants, in the above-captioned matter. Papers may be served at the address set forth below.

THE LAW OFFICE OF  
HARPER J. DIMMERMAN P.C.

By: 

HARPER J. DIMMERMAN, ESQUIRE  
1835 MARKET STREET, SUITE 2700  
PHILADELPHIA, PA 19103  
(215) 545-0600  
(215) 735-1011 FAX  
ID # 89572

*Counsel for Defendants*

Dated: February 2, 2009

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

*Plaintiff,*

v.

BARBARA J. YOUNG  
DALE R. YOUNG  
1044 West Street  
Mifflinville, PA 18631

*Defendants.*

COURT OF COMMON PLEAS  
COLUMBIA COUNTY

No.: 2006-CV-1612

2008-ED-175

MORTGAGE FORECLOSURE

Tax Parcel No.: 23-05F-028-05

**RULE TO SHOW CAUSE ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2009, upon consideration of Defendants' Petition to Postpone Sheriff's Sale of Real Property, it is hereby ORDERED and DECREED that:

A *telephonic* hearing will be held at the Columbia County Court of Common Pleas, on February 3, 2009, at \_\_\_\_\_ o'clock \_\_\_\_\_.M., before the Honorable Thomas A. James, Jr., J., with respect to this matter, and the Defendants must appear on that date and at that time to present evidence as to the reason(s) the Sheriff's Sale should be postponed.

The Defendants shall immediately serve a copy of the Petition, Rule to Show Cause Order, the proposed Order and all supporting papers upon Plaintiff's attorney personally, by facsimile or by overnight delivery. On the date of the hearing, Defendants must provide the Court with an Affidavit of Service. The Petition may be dismissed if the Defendants fail to prove that the Plaintiff's attorney was served, and no further postponements of the Sheriff's Sale may be granted by this Court.

**ALL PROCEEDINGS TO STAY MEANWHILE.**

BY THE COURT:

\_\_\_\_\_  
, J.



CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

*Plaintiff,*

v.

BARBARA J. YOUNG  
DALE R. YOUNG  
1044 West Street  
Mifflinville, PA 18631

*Defendants.*

COURT OF COMMON PLEAS  
COLUMBIA COUNTY

No.: 2006-CV-1612

2008-ED-175

MORTGAGE FORECLOSURE

Tax Parcel No.: 23-05F-028-05

**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2009, upon consideration of Defendants' Petition to Postpone Sheriff's Sale of Real Property, it is hereby ORDERED and DECREED that:

- (1) The Petition to Postpone Sheriff's Sale of Real Property is Granted, and the sale is postponed to \_\_\_\_\_ 2009, at \_\_\_\_\_ ;
- (2) The Defendants must serve a copy of this Order on the Sheriff by either faxing it to (570) 389-5625 or by delivering a copy to the Sheriff's office at:  
35 West Main Street  
Bloomsburg, PA 17815
- (3) The Columbia County Sheriff's Department shall announce said postponement at the Sheriff's Sale presently scheduled to be conducted on Wednesday, February 4, 2009 at 10:00 AM.
- (4) This Order is without prejudice to requests for other or substantive relief made upon further petition.

BY THE COURT:

\_\_\_\_\_  
, J.

THE LAW OFFICE OF HARPER J. DIMMERMAN P.C.  
BY: HARPER J. DIMMERMAN, ESQUIRE  
Identification No. 89572  
1835 Market Street, Suite 2700  
Philadelphia, PA 19103  
Telephone: (215) 545-0600  
Facsimile: (215) 735-1011

*Attorney for Defendants*

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

*Plaintiff,*

v.

BARBARA J. YOUNG  
DALE R. YOUNG  
1044 West Street  
Mifflinville, PA 18631

*Defendants.*

COURT OF COMMON PLEAS  
COLUMBIA COUNTY

No.: 2006-CV-1612

2008-ED-175

MORTGAGE FORECLOSURE

Tax Parcel No.: 23-05F-028-05

**DEFENDANTS' EMERGENCY PETITION TO POSTPONE**  
**SHERIFF'S SALE OF REAL PROPERTY**

1. Petitioners are Barbara J. Young and Dale R. Young, husband and wife, the Defendants/Borrowers (hereinafter "Petitioners" or "Defendants") in the above-captioned mortgage foreclosure case.

2. Petitioners are the Owners and Mortgagors of the real property involved in this mortgage foreclosure action located at 1044 West Street, Mifflinville, PA 18631, Tax Parcel Number: 23-05F-028-05 in Columbia County, Pennsylvania (hereinafter "Subject Property").

3. The Petitioners reside at the Subject Property.

4. This Sheriff's Sale should **not** proceed because Petitioners are in the process of negotiating a settlement with the Plaintiff. A true and correct copy of the documentation

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]* ☐ Agent ☒ Address *175*

B. Received by (Printed Name) *[Name]* C. Date of Delivery *10-28-08*

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

SENDER: COMPLETE THIS SECTION

1. Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.

2. Print your name and address on the reverse so that we can return the card to you.

3. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

U.S. SMALL BUSINESS ADMINISTRATION  
PHILADELPHIA DISTRICT OFFICE  
ROBERT N.C. NIX FEDERAL BUILDING  
900 MARKET STREET-5TH FLOOR  
PHILADELPHIA, PA 19107

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number *7007 2560 0002 1259 8688*

(Transfer from service label)

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-11

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]* ☐ Agent ☒ Address *175*

B. Received by (Printed Name) *[Name]* C. Date of Delivery *10/27*

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

SENDER: COMPLETE THIS SECTION

1. Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.

2. Print your name and address on the reverse so that we can return the card to you.

3. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

INTERNAL REVENUE SERVICE  
TECHNICAL SUPPORT GROUP  
WILLIAM GREEN FEDERAL BUILDING  
600 ARCH STREET ROOM 3259  
PHILADELPHIA, PA 19106

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number *7007 2560 0002 1259 8640*

(Transfer from service label)

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-11

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]* ☐ Agent ☒ Address *175*

B. Received by (Printed Name) *[Name]* C. Date of Delivery *OCT 24 2008*

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

SENDER: COMPLETE THIS SECTION

1. Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.

2. Print your name and address on the reverse so that we can return the card to you.

3. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

OFFICE OF F.A.I.R.  
DEPARTMENT OF PUBLIC WELFARE  
PO BOX 8016  
HARRISBURG, PA 17105

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number *7007 2560 0002 1259 8664*

(Transfer from service label)

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-11

SENDER: COMPLETE THIS SECTION

1. Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.

2. Print your name and address on the reverse so that we can return the card to you.

3. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF REVENUE-ATTN: SHERIFF SALE  
BUREAU OF COMPLIANCE  
CLEARANCE SUPPORT SECTION  
DEPARTMENT 281230  
HARRISBURG, PA 17128-1230

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]* ☐ Agent ☒ Address *175*

B. Received by (Printed Name) *[Name]* C. Date of Delivery *OCT 21 2008*

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

SENDER: COMPLETE THIS SECTION

1. Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.

2. Print your name and address on the reverse so that we can return the card to you.

3. Attach this card to the back of the mailpiece, or on the front if space permits.

Article Addressed to:

PA Dept of Public Welfare  
Health and Welfare Building  
Harrisburg, PA 17105

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Signature]* ☐ Agent ☒ Address *175*

B. Received by (Printed Name) *[Name]* C. Date of Delivery *OCT 24 2008*

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

3. Service Type

☒ Certified Mail ☐ Express Mail  
☐ Registered ☐ Return Receipt for Merchandise  
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

submitted directly to Plaintiff in support of this effort, also known as the Customer Hardship Assistance Package, has been annexed hereto and incorporated herein as Exhibit "A".

5. This Sheriff's Sale should **not** proceed because according to Plaintiff's representatives, because the instant Mortgage is a VA Loan, there is a possibility of a Loan Modification; that information was supplied to the Defendants on February 2, 2009.

6. Plaintiff's representatives have explained that there is a delay because the subject loan is a VA Loan and for the first time today, instructed Defendants to contact the VA directly.

7. This Sheriff's Sale should **not** proceed because Defendant, Dale R. Young, was injured at work and experienced a loss of income, which impacted his ability to cover expenditures. A true and correct copy of proof of Defendant, Dale R. Young's disability income has been annexed hereto and incorporated herein as Exhibit "B".

8. This Sheriff's Sale should **not** proceed because Petitioners dispute the amount Plaintiff claims is due and owing.

9. This Sheriff's Sale should **not** proceed because the Plaintiff is holding approximately \$8,000.00 of unapplied funds, which Petitioners intend on applying to amounts due and owing. A true and correct copy of the Account History, indicating approximately \$10,000.00 in payments, has been annexed hereto and incorporated herein as Exhibit "C".

10. This Sheriff's Sale should **not** proceed because Petitioners retained legal counsel, as of Sunday, February 1, 2009, and intend on working with the Plaintiff to achieve a swift and mutually beneficial resolution, outside of Court.

WHEREFORE, Petitioners respectfully request that this Honorable Court postpone the Sheriff's Sale scheduled for Wednesday, February 4, 2009, to a date this Court deems appropriate under the circumstances.

Respectfully submitted,

**THE LAW OFFICE OF  
HARPER J. DIMMERMAN P.C.**

By 

HARPER J. DIMMERMAN, ESQUIRE  
ATTORNEY FOR DEFENDANTS

Dated: February 2, 2009

THE LAW OFFICE OF HARPER J. DIMMERMAN P.C.  
BY: HARPER J. DIMMERMAN, ESQUIRE  
Identification No. 89572  
1835 Market Street, Suite 2700  
Philadelphia, PA 19103  
Telephone: (215) 545-0600  
Facsimile: (215) 735-1011

*Attorney for Defendants*

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

*Plaintiff,*

v.

BARBARA J. YOUNG  
DALE R. YOUNG  
1044 West Street  
Mifflinville, PA 18631

*Defendants.*

COURT OF COMMON PLEAS  
COLUMBIA COUNTY

No.: 2006-CV-1612

2008-ED-175

MORTGAGE FORECLOSURE

Tax Parcel No.: 23-05F-028-05

**DEFENDANTS' MEMORANDUM OF LAW IN SUPPORT OF**  
**EMERGENCY PETITION TO POSTPONE**  
**SHERIFF'S SALE OF REAL PROPERTY**

**I. MATTER BEFORE THE COURT AND RELIEF REQUESTED**

Defendants, Barbara J. Young and Dale R. Young (hereinafter "Defendants" or "Petitioners"), respectfully request, on an *Emergency* basis, that this Honorable Court postpone the Sheriff's Sale of 1044 West Street, Mifflinville, PA 18631, Tax Parcel Number: 23-05F-028-05, scheduled for **Wednesday, February 4, 2009 at 10:00 AM.**

**II. STATEMENT OF THE QUESTION INVOLVED**

Whether this Honorable Court should postpone the Sheriff's Sale in a mortgage foreclosure case under the circumstances set forth in the annexed Petition.

**Suggested Response: Yes.**

**III. OPERATIVE FACTS**

Defendants rely upon the facts contained in the attached Petition, as if that Petition was set forth, fully and at length, herein.

#### **IV. LEGAL ARGUMENT**

This Honorable Court may postpone or stay a Sheriff's Sale in accordance with Pa.R.C.P. 3183 (b), which provides:

Execution may be stayed by the court as to all or any part of the property of the defendant upon its own motion or application of any party in interest showing (2) any other legal or equitable ground.

Pa.R.C.P. 3183 (b)

The power of the Court to stay a Sheriff's Sale upon a showing of any legal or equitable ground derives not only from the Pennsylvania Rules of Court, but also from the inherent power of the court to control its own judgments and thereby prevent injustice. See Wilner v. Croyle, 214 Pa. Super. 91, 95, 252 A.2d 387, 389 (1969); Link Building and Loan Association v. Melnick, 325 Pa. 182, 184-185, 189 A. 470, 472 (1937) (Stay of execution is common, citing Sinking Fund Commissioners of Philadelphia v. Philadelphia, 324 Pa. 129, 188 A. 314; Augustine v. Augustine, 291 Pa. 15, 139 A. 585; Lewis v. Linton, 207 Pa. 320, 56 A. 874; Taylor's Appeal, 93 Pa. 21).

Pennsylvania courts have no shied away from applying this power and have granted stays in individual cases, see e.g. GMAC Mortgage Corp. of Pa. v. Watford, No. 2697, No. 23 Clearinghouse Review No. 5 at 619 (Pa. C.P. Phila. Jan. 27, 1988) (Order staying Sheriff's Sale on foreclosure judgment until defendant's claim for social security benefits could be resolved), as well as granted mass stays of Sheriff's Sales. See e.g., In Order Court Staying Sheriff Sale of Owner-Occupied Dwellings, Jan. Term 1983 #3414 (Bradley, C.J., Feb. 1983) (Order Granting Petition to Stay Sheriff's Sales); In re Order of Court Staying Execution of Sheriff Sales of Debtor Occupied Dwellings, No. 2 1983, Admin. Dkt (C.P. Allegheny Co. 1983)(Papadakos,

A.J.); In re Lawrence County Sheriff's Sales Scheduled for January 18, 1983, No. 9 1983, M.D. (C.P. Lawrence Co. 1983) (Caiazza, J.) (Petition to Stay Sheriff's Sale due to "the poor state of the local economy" granted).

The power to stay a Sheriff's Sale is always available to the Court to prevent an inequitable result and a manifest injustice. See Wilner v. Coyle, 214 Pa. Super. at 95, 252 A.2d at 389 (execution stayed in order that part of debt could be collected from husband jointly liable); Unity Savings Association v. American Urban Sciences Foundation, Inc., 337 Pa. Super. at 474, 487 A.2d at 358 (Sales stayed to determine that the lien of the seller creditor was extinguished). In Ralston Purina Co. v. Clem E. Clark & Son, Inc., 53 D. & C. 2d 737 (Columbia Cty 1971), the court stayed a Sheriff's Sale in order that the defendant could attack the amount which remained due and unpaid on the judgment upon which execution was issued.

#### **V. CONCLUSION**

The postponement in the matter *sub judice* should be granted for the reasons as set forth in accompanying Petition.

WHEREFORE, the Defendants respectfully request that this Honorable Court postpone the Sheriff's Sale of the Subject Property as requested in the foregoing Petition.

Respectfully submitted,

**THE LAW OFFICE OF  
HARPER J. DIMMERMAN P.C.**

By: 

HARPER J. DIMMERMAN, ESQUIRE  
ATTORNEY FOR DEFENDANTS

Dated: February 2, 2009



# **DEFENDANTS' EXHIBIT "A"**



Customer Service: 1-800-283-7918†

CitiMortgage.com

Security

Privacy

Citi.com

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About Us

Careers

Contact Us

Site Map

Home

Buying a Home

Refinancing a Home

Compare Loans

Apply

Homeowner Assist

Help

## Customer Hardship Assistance Package

**Instructions:**

Please complete all required fields. To expedite the process, please also complete as many of the optional fields as possible.

**CitiMortgage Hardship Assistance Package****\* What are your intentions regarding your property?**I wish to keep my home ☒**\* CitiMortgage Account Number:**

2001993520 -X

Please enter all digits before the dash.

Example: if your account number is: 0000567890-1, input 567890.

\* Required Fields

**Borrower Information****\* First Name:**

Dale

MI:

**\* Last Name:**

R Young

**\* Last 4 digits of Social Security Number:**

4808

Please Note: For any international phone numbers, please enter in the freeform box at the bottom of this form.

**\* Day Phone Number:**

570 - 336 - 6285

**Evening Phone Number:**

570 - 752 - 4797

**Cell Phone Number:**

570 - 336 - 6285

**Email Address:**

dale.r.young@gmail.co

**Property Address****\* Street Address:**

1044 West St

PO Box 621

**\* City:**

Mifflinville

**\* State:**

Pennsylvania (PA)

**\* Zip Code:**

18631

**Co-Borrower Information****\* First Name:**

Barbara

**MI: Last Name:**

J Young

**\* Last 4 digits of Social Security Number:**

3059

**Day Phone Number:**

570 - 336 - 0136

**Evening Phone Number:**

570 - 752 - 4797

**Cell Phone Number:**

570 - 336 - 0136

**Email Address:**

dale.r.young@gmail.co

**Mailing Address (If different than Property Address)****Street Address:****City:****State:**

Select One

**Zip Code:****Employment Information****Borrower's Current Employer:**

PA State Police

**Employer's Phone:**

570 - 826 - 2138

**Position:**

Computer Crime Analyst

**Years on Job:**

5 or more

**Co-Borrower's Current Employer:**

Smart Partner LLC

**Employer's Phone:**

570 - 387 - 3300

**Position:**

Mail Center Manager

**Years on Job:**

5 or more

Please enter the second job employer information below, if applicable:

**Borrower's Second Employer:**

Motorcycle Safety Prog

**Employer's Phone:**

800 - 874 - 8900

**Co-Borrower's Second Employer:****Employer's Phone:**

Position:

Site Administrator

Years on Job:

3

Position:

Years on Job:

Select One

If employed at current job for less than 5 years, please enter the previous employer information below:

Borrower's Previous Employer:

Co-Borrower's Previous Employer:

Employer's Phone:

Employer's Phone:

Position:

Position:

Years on Job:

Select One

Years on Job:

Select One

## Property Information

\* Is the property for sale?

☐ Yes ☒ No

If Yes, Original List Date:

mm-dd-yyyy

Original List Price:

\$ .00

Realtor Name:

Realtor Phone:

\* Is the property for rent?

☐ Yes ☒ No

If yes, Monthly Rent:

\$ .00

Month last paid:

Select One

## Monthly Income Information

Please round amounts to the nearest dollar.

## Borrower Salary Information

\* Gross Salary/Wages:

\$ 3838 .00

\* Net Salary/Wages:

\$ 2700 .00

1. Additional Income Amount 1. Additional Income Type

\$ 340 .00 Second Job ☒ \$ .00 Select One ☒ \$340.00

2. Additional Income Amount 2. Additional Income Type

\$ .00 Select One ☒ \$0.00

Total Net Personal Income

\$3,040.00

## Co-Borrower Salary Information

Gross Salary/Wages:

\$ 5000 .00

Net Salary/Wages:

\$ 3900 .00

Total

\$6,600.00

Total Net Personal Income

\$3,900.00

\$6,940.00

## Monthly Expenses

Please round amounts to the nearest dollar.

Description (Monthly)

Monthly Payment

Balance Due

Number of Months  
Delinquent1. Primary Home Mortgage  
(If Escrowed, include Taxes and Insurance)

\$ 997 .00 \$ .00

Select One

2. Taxes on Primary Home  
(If not included in #1)

\$ .00 \$ .00

Select One

3. Insurance on Primary Home  
(If not included in #1)

\$ .00 \$ .00

Select One

4. Rent Payment  
(if owner not occupying subject property)

\$ .00 \$ .00

Select One

5. Maintenance/Homeowners Association Fees

\$ .00 \$ .00

Select One

6. Other Mortgages

\$ .00 \$ .00

Select One

7. Automobile Loans

\$ 600 .00 \$ 22000 .00

Select One

8. Other Loans

\$ 200 .00 \$ 3274 .00

Select One

9. Credit Cards (minimum payment)	\$		.00	\$		.00	Select One
10. Alimony / Child Support	\$		.00	\$		.00	Select One
11. Child/Dependent Care	\$		.00	\$		.00	Select One
12. Utilities (water, electricity, gas, cable, etc.)	\$	350	.00	\$		.00	Select One
13. Telephone (land line and cell phone)	\$	160	.00	\$		.00	Select One
14. Insurance (automobile, health, life)	\$	282	.00	\$		.00	Select One
15. Medical Expenses (uninsured)	\$		.00	\$		.00	Select One
16. Car expenses (gas, maintenance, parking)	\$	300	.00	\$		.00	Select One
17. Groceries and Toiletries	\$	400	.00	\$		.00	Select One
18. Other Monthly Expense (Explain)	\$		.00	\$		.00	Select One
19. Other Monthly Expense (Explain)	\$		.00	\$		.00	Select One
20. Other Monthly Expense (Explain)	\$		.00	\$		.00	Select One
<b>Total Personal Expenses (lines 1 through 20):</b>		<b>\$3,289.00</b>		<b>\$25,274.00</b>			

**Total Net Disposable Income \$3,651.00**  
 (Total Net Personal Income - Total Personal Expenses = Total Net Disposable Income)

## General Questions

\* Do you occupy this mortgaged property as a Primary Residence? ☒ Yes ☐ No  
 If yes, please answer the following 3 questions:  
 How long at this residence? 4 years 5 months  
 How many people in the household? 4  
 How many dependents under the age of 18?  Select One

\* Do you have any debts or obligations secured by this property?  
 Example: Second Mortgage, Home Equity Loan, Judgments, or Liens. ☐ Yes ☒ No  
 If yes, please itemize debts: Amount  
 Obligation/Debt #1: \$ .00  
 Obligation/Debt #2: \$ .00  
 Obligation/Debt #3: \$ .00

\* What is the amount of funds you immediately have available to apply towards your mortgage? \$ 1500 .00

\* In addition to the amount stated above, what amount will you have available in 30 days? \$ 3000 .00

\* Briefly explain the reason why you are behind on your mortgage payment(s) or feel you won't be able to make your monthly payments going forward:  
 We are in this situation because of a misunderstanding. In Feb. of last year, we were under bankruptcy protection, and I ended up getting hurt at work. While off work, I  
 1112 characters entered. 888 characters remaining

What other information would you like to share with us?  
 My house is in foreclosure now, and is set for Sheriff's sale Feb 4th, 2009. I beg you to help us keep our home. My wife and I are able and willing to pay. We are an excellent  
 809 characters entered. 1191 characters remaining

Print

I certify that the financial information stated above is true; and is an accurate account of my financial condition. I grant CitiMortgage, Inc. the authority to confirm the information I have disclosed in this financial statement and to verify that it is accurate.

† Calls are randomly monitored and recorded to ensure quality service.

Equal housing lender

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Customer Service: 1-800-667-8424†

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## Customer Hardship Assistance Package

**Thank you for your submission.**

A Loss Mitigation specialist will contact you in approximately 10-15 days of receiving your package.  
Your identification number is your CitiMortgage account number.

Please print a copy of this page for your records.

**Reminder:** in order for your package to be complete, you must send the following supporting documents:

- 2 recent consecutive pay stubs (or profit and loss statement), or
- 2 consecutive months of bank statements, or
- 2 consecutive tax returns, and
- Letter of Authorization, if applicable to speak with a third party

Please note your mortgage account number on the top right-hand corner of each page for identification.

You may fax or mail your documents to:

**If you have a First Mortgage (purchase money or refinance):**

Call us at 1-866-751-6911† Monday through Friday between the hours of 8:00 a.m. and 6:00 p.m. ET.

You can fax the completed package to 1-301-696-4473, or mail it to:

CitiMortgage, Inc.  
Dept 0010  
5280 Corporate Dr.  
Frederick, MD 21703.

**If you have a Second Mortgage, Home Equity Loan, or Home Equity Line of Credit:**

Call us at 1-800-788-4517† Monday through Friday between the hours of 8:00 a.m. and 11:00 p.m. ET.

You can fax the completed package to 1-866-704-8050, or mail it to:

CitiMortgage, Inc.  
1000 Technology Drive MS 514  
O'Fallon, MO 63368

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† Calls are randomly monitored and recorded to ensure quality service.



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# **DEFENDANTS' EXHIBIT "B"**

**PETITION TO:**  
(Check any that apply)

EMPLOYEE SOCIAL SECURITY NUMBER

163-80-4808

DATE OF INJURY

02/14/2008

MONTH DAY  
PA BWC CLAIM NUMBER (IF KNOWN)

YEAR

3291088

- Review Medical Treatment and/or Billing  
☒ Terminate Compensation Benefits (Stop payment of Workers' Compensation)  
Terminate Compensation: Based upon physician's affidavit, a special supersedeas hearing to be scheduled  
Modify Compensation Benefits (Reduce/increase amount of Workers' Compensation)  
Suspend Compensation Benefits  
Review Compensation Benefits (Ask Judge to Review Agreement/Notice for mistakes)  
Review Compensation Benefit Offset  
Reinstate Compensation Benefits  
Set aside Final Receipt (Ask Judge to set aside Agreement to Stop Compensation)  
Seek approval of a Compromise and Release Agreement (Ask Judge to approve settlement)  
This petition is filed on behalf of: Employee ☒ Employer/Insurer

**EMPLOYEE**

First Name Dale R.  
Last Name Young  
If Deceased - Dependent or Guardian  
First Name  
Last Name  
Address 1044 West Street  
Address  
City/Town Mifflinville State Pa Zip 18631  
County Columbia  
Telephone 5707524797

**EMPLOYER**

Name Commonwealth of Pa/State Police  
Address 1800 Elmenton Avenue  
Address  
City/Town Harrisburg State Pa Zip 17110  
County Dauphin  
Telephone 7177833843 FEIN 25-1644382

**VS. INSURER or THIRD PARTY ADMINISTRATOR (if self insured)**

Name Commonwealth of Pa/CompServices, Inc. (TPA)  
Address 2505 North Front Street  
Address  
City/Town Harrisburg State Pa Zip 17110  
Telephone 8007192889 Bureau Code 3000  
County Dauphin  
Claim # 020/163604808 FEIN 25-1686685

NOTICE: This Petition must be filed with the Bureau, with a copy being served on the opposing party. If this petition is filed by the insurer or employer, they must attach a Notice to Claimant, Form LIBC-758, to the employee's copy. Questions regarding the completion of this form may be directed to the Bureau of Workers' Compensation Helpline at 800-482-2383.

**TO YOUR HONORABLE JUDGE:**

As of 11/19/2008

the above petitioner requests the Workers' Compensation Judge to order the above action for the following reason(s):

- ☒ 1. Full Recovery  
2. Specific Job Offered  
3. Work Generally Available  
4. Able to Return to Unrestricted Work  
5. Has Returned to Work  
6. Reasonable Treatment Refused  
7. Resolution to Specific Loss  
8. Incorrect Description of Injury  
9. Incorrect Average Weekly Wage  
10. Medical Bills Unpaid  
11. Medical Bills Not Related  
12. Worsening of Condition  
13. Injury Causing Decreased Earning Power  
14. Section 314 Order Violated  
15. Voluntary Withdrawal from Workforce  
16. Subrogation, Credit for  
U.C. Social Security Third Party Recovery  
S&A Pension  
17. Other:

**378 0404**



Compensation benefits are ☒ being paid have been paid based on a:

X Notice of Compensation Payable dated	MONTH	DAY	YEAR
		02/29/2008	
Agreement dated	MONTH	DAY	YEAR
Supplemental Agreement dated	MONTH	DAY	YEAR
Judge's Award dated	MONTH	DAY	YEAR
Board Order dated	MONTH	DAY	YEAR
Court Order dated	MONTH	DAY	YEAR

A supersedeas is requested pursuant to Section 413(A.2). ☒ Yes ☐ No  
If Yes, list reasons: Claimant's full recovery

Compensation has been or is being paid as follows:

Weekly rate \$	623.75	Paid for	Weeks	Days to Date
Average weekly wage \$	935.62			
	MONTH DAY YEAR			

Date of most recent payment

I hereby certify that a copy of this Petition has been served on the opposing party on 12/23/2008  
at the address shown on the face of this form.

PLEASE ENTER MY APPEARANCE FOR PETITIONER:

Attorney

Name Paul C. Cipriano, Esquire		
Firm Name The Law Offices of Sand and Sidel, P.C.		
Street 1 113 S. 21st Street		
Street 2		
City/Town Philadelphia	State Pa	Zip Code 19103
Telephone (215) 851 - 0200	PA Attorney ID Number 64380	

Counsel for Respondent (if known):

Name		
Firm Name		
Street 1		
Street 2		
City/Town	State	Zip Code
Telephone ( ) -	PA Attorney ID Number	

  
Signature of Petitioner or Representative

Paul C. Cipriano, Esquire

Name of Petitioner or Representative

DATE OF PETITION

12/23/2008

MONTH DAY YEAR

Any individual filing misleading or incomplete information knowingly and with intent to defraud is in violation of Section 1102 of the Pennsylvania Workers' Compensation Act and may also be subject to criminal and civil penalties through Pennsylvania Act 185.

Auxiliary aids and services are available upon request to individuals with disabilities.

Equal Opportunity Employer/Program

# **DEFENDANTS' EXHIBIT "C"**

2/1/2009

psecu@home

**Account History**

Date ▲	Transaction Description	Amount	Balance	Check/Misc.
08/08/2008	ELECTRONIC BILL 0001 FOR \$2,750.00 WAS SENT TO CITIMORTGAGE INC			
08/12/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC	-\$2,750.00	\$692.20	
08/22/2008	ELECTRONIC BILL 0001 FOR \$500.00 WAS SENT TO CITIMORTGAGE INC			
08/26/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC	-\$500.00	\$396.60	

2/1/2009

psecu@home

## Account History

Date ▲	Transaction Description	Amount	Balance	Check/Misc.
09/05/2008	ELECTRONIC BILL 0001 FOR \$600.00 WAS SENT TO CITIMORTGAGE INC			
09/09/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC	-\$600.00	\$520.86	
09/19/2008	ELECTRONIC BILL 0001 FOR \$600.00 WAS SENT TO CITIMORTGAGE INC			
09/23/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC	-\$600.00	\$337.87	
10/03/2008	ELECTRONIC BILL 0001 FOR \$600.00 WAS SENT TO CITIMORTGAGE INC			
10/07/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC	-\$600.00	\$595.53	
10/17/2008	ELECTRONIC BILL 0001 FOR \$600.00 WAS SENT TO CITIMORTGAGE INC			
10/21/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC	-\$600.00	\$1,033.29	
10/31/2008	ELECTRONIC BILL 0001 FOR \$750.00 WAS SENT TO CITIMORTGAGE INC			
11/04/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC	-\$750.00	\$489.69	
11/14/2008	ELECTRONIC BILL 0001 FOR \$750.00 WAS SENT TO CITIMORTGAGE INC			
11/18/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC <u>Lodging</u>	-\$750.00	\$1,459.43	
11/28/2008	ELECTRONIC BILL 0001 FOR \$750.00 WAS SENT TO CITIMORTGAGE INC			

2/1/2009

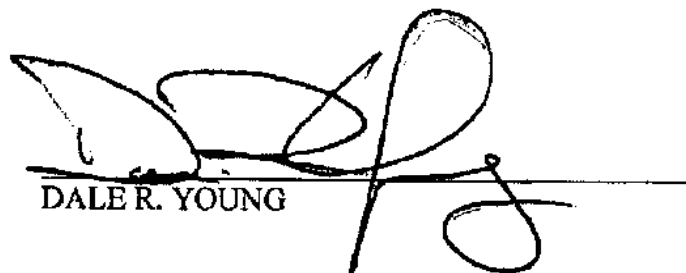
psecu@home

## Account History

Date	Transaction Description	Amount	Balance	Check/Misc.
12/02/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC <u>Lodging</u>	-\$750.00	\$3,565.15	
12/12/2008	ELECTRONIC BILL 0001 FOR \$750.00 WAS SENT TO CITIMORTGAGE INC			
12/16/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC <u>Lodging</u>	-\$750.00	\$817.43	
12/26/2008	ELECTRONIC BILL 0001 FOR \$750.00 WAS SENT TO CITIMORTGAGE INC			
12/30/2008	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC <u>Lodging</u>	-\$750.00	\$33.82	
01/09/2009	ELECTRONIC BILL 0001 FOR \$750.00 WAS SENT TO CITIMORTGAGE INC			
01/13/2009	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC <u>Lodging</u>	-\$750.00	\$526.49	
01/23/2009	ELECTRONIC BILL 0001 FOR \$750.00 WAS SENT TO CITIMORTGAGE INC			
01/27/2009	WITHDRAWAL CITIMORTGAGE INC TYPE: E-BILL CO: CITIMORTGAGE INC <u>Lodging</u>	-\$750.00	\$530.90	

VERIFICATION

DALE R. YOUNG, Defendant in the subject litigation, verifies that he is a party to the within action and that the statements set forth in the within document are true and correct to the best of his knowledge, information and belief. He understands that statements herein are made subject to the penalties set forth in 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

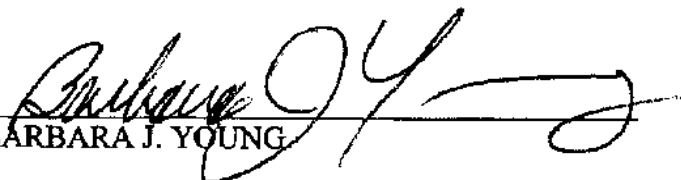


DALE R. YOUNG

DATED: 2-2-09

VERIFICATION

BARBARA J. YOUNG, Defendant in the subject litigation, verifies that she is a party to the within action and that the statements set forth in the within document are true and correct to the best of her knowledge, information and belief. She understands that statements herein are made subject to the penalties set forth in 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.

  
BARBARA J. YOUNG

DATED: 2-2-09

**CERTIFICATION OF SERVICE**

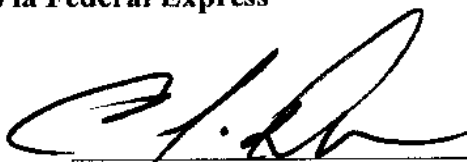
I, HARPER J. DIMMERMAN, hereby certify on the 2<sup>nd</sup> day of February, 2009, a true and correct copy of Defendants' Petition to Postpone Sheriff's Sale was served upon the following and in the manner listed below:

Goldbeck McCafferty & McKeever  
Michael T. McKeever, Esq.  
Courtenay R. Dunn, Esq.  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106

**Counsel for Plaintiff**  
**Via Hand Delivery on Tuesday, February 3, 2009**  
**And Electronic Mail on Monday, February 02, 2009**

Sheriff of Columbia County  
35 West Main Street  
Bloomsburg, PA 17815

**Via Federal Express**

A handwritten signature in black ink, appearing to read 'H.J. Dimmerman', written over a horizontal line.

HARPER J. DIMMERMAN, ESQUIRE  
COUNSEL FOR DEFENDANTS



# COLUMBIA COUNTY SHERIFF'S OFFICE

## SHERIFF'S REAL ESTATE FINAL COST SHEET

Critchfield VS James & Jane Young  
NO. 170-08 ED NO. 1000-000 JD

DATE/TIME OF SALE: Feb. 4 1000

BID PRICE (INCLUDES COST) \$ \_\_\_\_\_

POUNDAGE – 2% OF BID \$ \_\_\_\_\_

TRANSFER TAX – 2% OF FAIR MKT \$ \_\_\_\_\_

MISC. COSTS \$ \_\_\_\_\_

TOTAL AMOUNT NEEDED TO PURCHASE \$ \_\_\_\_\_

PURCHASER(S): \_\_\_\_\_

ADDRESS: \_\_\_\_\_

NAMES(S) ON DEED: \_\_\_\_\_

PURCHASER(S) SIGNATURE(S): \_\_\_\_\_

TOTAL DUE: \$ \_\_\_\_\_

LESS DEPOSIT: \$ \_\_\_\_\_

DOWN PAYMENT: \$ \_\_\_\_\_

TOTAL DUE IN 8 DAYS \$ \_\_\_\_\_

STATE OF PENNSYLVANIA  
COUNTY OF COLUMBIA                      1 SS

Paula J. Barry being duly sworn according to law deposes and says that Press Enterprise is a newspaper of general circulation with its principal office and place of business at 3185 Lackawanna Avenue, Bloomsburg, County of Columbia and State of Pennsylvania, and was established on the 1st day of March, 1902, and has been published daily, continuously in said Town, County and State since that day and on the attached notice January 14, 21, 28, 2009 as printed and published; that the affiant is one of the officers or publisher or designated agent of the owner or publisher of said newspaper in which legal advertisement was published; that neither the affiant nor Press Enterprise is interested in the subject matter of said notice and advertisement and that all of the allegations in the foregoing statement as to time, place, and character of publication are true.

.....21.....  
Sworn and subscribed to before me this 30th day of JANU 2009.....

.....  
(Notary Public)  
COMMONWEALTH OF PENNSYLVANIA  
My commission expires .....  
Notarial Seal  
Dennis L. Ashenfelder, Notary Public  
Scott Twp., Columbia County  
My Commission Expires July 3, 2011  
Member, Pennsylvania Association of Notaries

And now,....., 20....., I hereby certify that the advertising and publication charges amounting to \$.....for publishing the foregoing notice, and the fee for this affidavit have been paid in full.

.....

**FEBRUARY 4, 2009**

- 9:00 AM JEFFERY WHITENIGHT—237 SLABTOWN RD CATAWISSA—20-04A-003 NO taxes Due
- 9:00 AM BRENDA HARGRAVES—10 FIRST AVE. BERWICK—07-01A-010 2007 + 2008 Taxes Due
- 9:00 AM ROGER RESSEGUIE—256 THOMAS ROAD BLOOMSBURG—26-04-007 NO taxes Due
- 9:00 AM TOM FENSTERMACHER & HENRY GEORGE BELLUM—4087 SAWMILL RD BLOOMSBURG—31-02-012  
BKRPT? Yes 2006, 2007 + 2008 taxes Due
- 9:00 AM ANDREW & NICOLE HOKE—209 E. FRONT ST. BERWICK—04A-06-055 NO taxes Due
- 9:00 AM AARON & HOLLY PATTERSON—239 E 8<sup>TH</sup> STREET BERWICK—04A-04-097 NO taxes Due
- 9:30 AM MARK & JOSELLE MULLERY—6130 OLD BERWICK RD BLOOMSBURG—12-03C-002 2007 + 2008 Taxes Due
- 9:30 AM MICHAEL & PENNY NEARHOOF—66 BUCKHORN RD BLOOMSBURG—~~18-02A-050~~  
STAYED TIL MAR 25 0930 AM
- 9:30 AM STEPHAN LEVAN, JR.—20 AMRON DRIVE BLOOMSBURG—12-05D-015 NO taxes Due
- 9:30 AM JOHN GOMEZ—75 LOWER HILLTOP ROAD BERWICK—07-03-A-055 & 07-03-A-062 NO taxes Due
- 9:30 AM JASON & CHRISTINA HOCK—355 PEARL ST. BERWICK—04A-01-115 NO taxes Due
- 9:30 AM BYRON & SANDRA YOST—1096 RIDGE ROAD ORANGEVILLE—15-17A-008 NO taxes Due
- 10:00 AM BARBARA & DALE YOUNG—1044 WEST STREET MIFFLINVILLE—23-05F-028-05 NO taxes Due
- 10:00 AM HAROLD HAUCK—734 CATHERINE STREET BLOOMSBURG—05E-02-021 NO taxes Due
- 10:00 AM RONALD & LINDA MILLER—3081 COLUMBIA BLVD BLOOMSBURG—31-04-040 2007 + 2008 Taxes Due
- 10:00 AM CHARLES CREASY—1730 SPRING GARDEN AVE. BERWICK—04D-02-038 2008 Taxes Due
- 10:00 AM KATHLEEN & TIMOTHY THORYK—1429 SPRING GARDEN AVE. BERWICK—04D-08-074 NO taxes Due
- 10:00 AM JOSHUA FOUGHT—515 N. ARCH ST. BERWICK—04D-08-220 NO taxes Due

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) 704-6300

Wednesday, October 22, 2008

**SUSAN NEVEL-TAX COLLECTOR  
226 E 5TH STREET  
MIFFLINVILLE, PA 18631-**

**CITIMORTGAGE INC.  
VS  
BARBARA J. YOUNG  
DALE R. YOUNG**

**DOCKET # 175ED2008**

**JD # 1612JD2006**

Dear Sir:

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

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

Respectfully,

*Timothy T. Chamberlain*

Timothy T. Chamberlain  
Sheriff of Columbia County

*County tax paid*

*Sched. 107528 Due.*

*Turned over to tax claims*

*1/13/09*

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Michael T. McKeever  
Attorney I.D.#56129  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532  
215-825-6318  
Attorney for Plaintiff

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481  
Plaintiff

vs.

BARBARA J. YOUNG  
DALE R. YOUNG  
Mortgagor(s) and Record Owner(s)

1044 West Street  
Mifflinville, PA 18631

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Columbia County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 2006-CV-1612

*2008-ED-175*

THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE.

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

TO: YOUNG, DALE R.  
**DALE R. YOUNG**  
1044 West Street  
Mifflinville, PA 18631

Your house at 1044 West Street, Mifflinville, PA 18631 is scheduled to be sold at Sheriff's Sale on ~~Feb. 4, 2009 10:00~~ ~~9:30~~ ~~AM~~, at 9:30 AM, in Sheriff's Office, Courthouse, Bloomsburg, PA to enforce the court judgment of \$141,600.14 obtained by CITIMORTGAGE INC. against you.

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

To prevent this Sheriff's Sale you must take immediate action:

1. The sale will be cancelled if you pay to CITIMORTGAGE INC., the back payments, late charges, costs and reasonable attorney's fees due. To find out how much you must pay call: 215-825-6329 or 1-866-413-2311.
2. You may be able to stop the sale by filing a petition asking the Court to strike or open judgment, if the judgment was improperly entered. You may also ask the Court to postpone the sale for good cause.

3. You may also be able to stop the sale through other legal proceedings.
4. You may need an attorney to assert your rights. The sooner you contact one, the more chance you will have of stopping the sale. (See notice below on how to obtain an attorney).

**YOU MAY STILL BE ABLE TO SAVE YOUR PROPERTY AND YOU HAVE OTHER RIGHTS  
EVEN IF THE SHERIFF'S SALE DOES NOT 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 price by calling the Sheriff of Columbia County at 570-389-5622.
2. You may be able to petition the Court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.
3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened, you may call the Sheriff of Columbia County at 570-389-5622.
4. If the amount due from the Buyer is not paid to the Sheriff, you will remain the owner of the property as if the sale never happened.
5. You have a right to remain in the property until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.
6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money bid for your house will be filed by the Sheriff within thirty (30) days from the date of the Sheriff's Sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after the schedule of distribution is filed.
7. You may also have other rights and defenses, or ways of getting your house back, if you act immediately after the sale.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE LISTED BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

NORTH PENN LEGAL SERVICES F/K/A SUSQUEHANNA LEGAL SERVICES

168 E. 5th Street  
Bloomsburg, PA 17815  
717-784-8760

PENNSYLVANIA BAR ASSOCIATION

P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

Resources available for Homeowners in Foreclosure

**ACT NOW!**

Even though your lender (and our client) has filed an Action of Mortgage Foreclosure against you, you still may be able to SAVE YOUR HOME FROM FORECLOSURE.

- 1). Call an attorney. For referrals to a qualified attorney call either of the following numbers: 717-784-8760 or 800-692-7375.
- 2). Call the Consumer Credit Counseling Agency at 1-800-989-2227 for free counseling.
- 3). Visit HUD'S website [www.hud.gov](http://www.hud.gov) for Help for Homeowners Facing the Loss of Their Homes.
- 4). Pennsylvania Housing Finance Agency also offers other loan programs that may assist homeowners in default. Please See the PHFA website: <http://www.phfa.org/consumers/homeowners/rcal.aspx>.
- 5). Call the Plaintiff (your lender) at and ask to speak to someone about Loss Mitigation or Home Retention options.
- 6). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout / Home Retention Package. Call our toll free number at 1-866-413-2311 or via email at [homeretention@goldbecklaw.com](mailto:homeretention@goldbecklaw.com). Call Seth at 215-825-6329 or fax 215-825-6429. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is David Fein who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of FN-1015.

Para informacion en espanol puede comunicarse con Loretta al 215-825-6344.

175  
**GOLDBECK McCAFFERTY & McKEEVER**  
A PROFESSIONAL CORPORATION  
SUITE 5000 MELLON INDEPENDENCE CENTER  
701 MARKET STREET  
PHILADELPHIA, PA 19106  
WWW.GOLDBECKLAW.COM

January 7, 2009

SHERIFF OF COLUMBIA COUNTY  
Sheriff's Office  
PO Box 380  
Bloomsburg, PA 17815

RE: No. 2006-CV-1612  
**BARBARA J. YOUNG and DALE R. YOUNG**

Real Estate Division:

The above case may be sold on February 04, 2009. It has been properly served in accordance with Rule 3129.

Very truly yours,

GOLDBECK McCAFFERTY & McKEEVER

By: **Antoniette Black, Paralegal**  
Phone: (215) 825-6347 (direct dial)  
Fax: (215) 825-6447  
Email: [ablack@goldbecklaw.com](mailto:ablack@goldbecklaw.com)



GOLDBECK McCAFFERTY & McKEEVER  
BY: Michael T. McKeever  
Attorney I.D.#56129  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532  
215-627-1322

FN-1015  
CF: 11/08/2006  
SD: 02/04/2009  
\$141,600.14

Attorney for Plaintiff

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

Plaintiff

vs.

BARBARA J. YOUNG  
DALE R. YOUNG  
Mortgagor(s) and  
Record Owner(s)

1044 West Street  
Mifflinville, PA 18631

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Columbia County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 2006-CV-1612

**CERTIFICATE OF SERVICE**  
**PURSUANT TO Pa.R.C.P. 3129.2 (c) (2)**

Michael T. McKeever, Esquire, Attorney for Plaintiff, hereby certifies that service on the Defendants of the Notice of Sheriff Sale was made by:

- PER DEPUTY ARTER (10/28/09)*
- ☒ Personal Service by the Sheriff's Office/~~competent adult (copy of return attached)~~
  - ☐ Certified mail by Michael T. McKeever (original green Postal return receipt attached).
  - ☐ Certified mail by Sheriff's Office.
  - ☐ Ordinary mail by Michael T. McKeever, Esquire to Attorney for Defendant(s) of record (proof of mailing attached).
  - ☐ Acknowledgment of Sheriff's Sale by Attorney for Defendant(s) (proof of acknowledgment attached).
  - ☐ Ordinary mail by Sheriff's Office to Attorney for Defendant(s) of record.

**IF SERVICE WAS ACCOMPLISHED BY COURT ORDER.**

- ☐ Premises was posted by Sheriff's Office/competent adult (copy of return attached).
- ☐ Certified Mail & ordinary mail by Sheriff's Office (copy of return attached).
- ☐ Certified Mail & ordinary mail by Michael T. McKeever (original receipt(s) for Certified Mail attached).
- ☐ Published in accordance with court order (copy of publication attached).

Pursuant to the Affidavit under Rule 3129 (copy attached), service on all lienholders (if any) has been made by ordinary mail by Michael T. McKeever, Esquire (copies of proofs of mailing attached).

The undersigned understands that the statements herein are subject to the penalties provided by 18 P.S. Section 4904.

Respectfully submitted,

*Michael T. McKeever*  
BY: Michael T. McKeever, Esquire  
Attorney for Plaintiff

Name and Address of Sender  
**GOLDBECK  
SUITE 5000  
701 MARKET STREET  
PHILADELPHIA, PA  
19106-1532**

Check type of mail or service:

- ☐ Certified  
☐ COD  
☐ Registered  
☐ Delivery Confirmation  
☐ Express Mail  
☐ Insured
- ☐ Recorded Delivery (International)  
☐ Registered  
☐ Return Receipt for Merchandise  
☐ Signature Confirmation

Affix Stamp Here  
(If issued as a  
certificate of mailing,  
or for additional copies  
of this bill)

Postmark and  
Date of Receipt

Article Number	Addressee (Name, Street, City, State, & ZIP Code)	Postage	Fee	Handling Charge	Actual Value If Registered	Insured Value	Due Sender if COD	DC Fee	SC Fee	SH Fee	RD Fee	RR Fee
1.	PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement Health and Welfare Bldg. - Room 432 Harrisburg, PA 17105-2675											
2.	DOMESTIC RELATIONS OF COLUMBIA COUNTY PO Box 380 Bloomisburg, PA 17815											
3.	TENANTS/OCCUPANTS 1044 West Street Mifflinville, PA 18631											
4.												
5.												
6.												
7.												
8.												
Total Number of Pieces Listed by Sender		Total Number of Pieces Received at Post Office										



See Privacy Act Statement on Reverse

Complete by Typewriter, Ink, or Ball Point Pen

PS Form 3877, February 2002 (Page 1 of 2)

FN-1015 Columbia County Sale Date: 02/04/2009

BARBARA J. YOUNG & DALE R. YOUNG

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Michael T. McKeever  
Attorney I.D.#56129  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-825-6320  
Attorney for Plaintiff

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

Plaintiff

vs.

BARBARA J. YOUNG  
DALE R. YOUNG  
**Mortgagor(s) and Record Owner(s)**

1044 West Street  
Mifflinville, PA 18631

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Columbia County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 2006-CV-1612

**AFFIDAVIT PURSUANT TO RULE 3129**

CITIMORTGAGE INC., Plaintiff in the above action, by its attorney, Michael T. McKeever, Esquire, sets forth as of the date the praecipe for the writ of execution was filed the following information concerning the real property located at:

1044 West Street  
Mifflinville, PA 18631

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

BARBARA J. YOUNG  
1044 West Street  
Mifflinville, PA 18631

DALE R. YOUNG  
1044 West Street  
Mifflinville, PA 18631

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

BARBARA J. YOUNG  
1044 West Street  
Mifflinville, PA 18631

DALE R. YOUNG  
1044 West Street  
Mifflinville, PA 18631

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

DOMESTIC RELATIONS OF COLUMBIA COUNTY  
PO Box 380  
Bloomsburg, PA 17815

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement  
Health and Welfare Bldg. - Room 432  
Harrisburg, PA 17105-2675

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

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

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

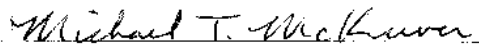
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale.

TENANTS/OCCUPANTS  
1044 West Street  
Mifflinville, PA 18631

(attach separate sheet if more space is needed)

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.

DATED: January 7, 2009

  
GOLDBECK McCAFFERTY & McKEEVER  
BY: Michael T. McKeever, Esq.  
Attorney for Plaintiff

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.

CITIMORTGAGE, INC.

VS.

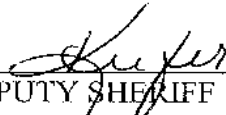
BARBARA & DALE YOUNG


WRIT OF EXECUTION #175 OF 2008 ED

POSTING OF PROPERTY

January 5, 2009 POSTED A COPY OF THE SHERIFF'S SALE BILL ON THE  
PROPERTY OF BARBARA & DALE YOUNG AT 1044 WEST STREET MIFFLINVILLE  
COLUMBIA COUNTY PENNSYLVANIA. SAID POSTING PERFORMED BY  
COLUMBIA COUNTY DEPUTY SHERIFF KRISTOPHER KEEFER.

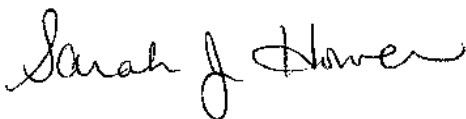
SO ANSWERS:

  
DEPUTY SHERIFF

  
TIMOTHY T. CHAMBERLAIN  
SHERIFF

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 7<sup>TH</sup> DAY OF JANUARY 2009



NOTARIAL SEAL  
SARAH J. HOWER, Notary Public  
Bloomsburg, Columbia County, PA  
My Commission Expires September 30, 2012

TIMOTHY T. CHAMBERLAIN



SHERIFF OF COLUMBIA COUNTY  
COURT HOUSE - P.O. BOX 300  
BLOOMSBURG, PA 17815  
FAX: (570) 389-5625

PHONE  
(570) 389-5622

24 HOUR PHONE  
(570) 784-6300

CITIMORTGAGE INC.

Docket # 175ED2008

VS

MORTGAGE FORECLOSURE


BARBARA J. YOUNG  
DALE R. YOUNG

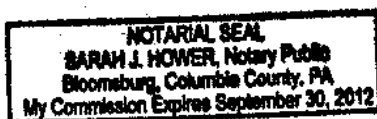
AFFIDAVIT OF SERVICE

NOW, THIS TUESDAY, OCTOBER 28, 2008, AT 9:25 AM, SERVED THE WITHIN MORTGAGE FORECLOSURE UPON DALE YOUNG AT 1044 WEST STREET, MIFFLINVILLE BY HANDING TO DALE YOUNG, , 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 TUESDAY, OCTOBER 28, 2008

  
NOTARY PUBLIC





X  
TIMOTHY T. CHAMBERLAIN  
SHERIFF

X   
P. D'ANGELO  
DEPUTY SHERIFF

GOLDBECK MCCAFFERTY & MCKEEVER  
111 S. INDEPENDENCE MALL EAST  
Suite 500  
PHILADELPHIA, PA 19106

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) 784-8300

CITIMORTGAGE INC.

Docket # 175ED2008

VS

MORTGAGE FORECLOSURE

BARBARA J. YOUNG  
DALE R. YOUNG

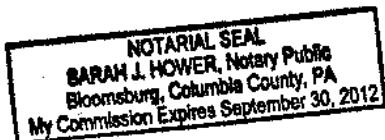
AFFIDAVIT OF SERVICE

NOW, THIS TUESDAY, OCTOBER 28, 2008, AT 9:25 AM, SERVED THE WITHIN MORTGAGE FORECLOSURE UPON BARBARA YOUNG AT 1044 WEST STREET, MIFFLINVILLE BY HANDING TO DALE YOUNG, HUSBAND, 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 TUESDAY, OCTOBER 28, 2008

  
NOTARY PUBLIC





X  
TIMOTHY T. CHAMBERLAIN  
SHERIFF

X   
P. D'ANGELO  
DEPUTY SHERIFF

GOLDBECK MCCAFFERTY & MCKEEVER  
111 S. INDEPENDENCE MALL EAST  
Suite 500  
PHILADELPHIA, PA 19106

# COLUMBIA COUNTY SHERIFF'S OFFICE

## PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN  
DATE RECEIVED 10/20/2008

SERVICE# 1 - OF - 13 SERVICES  
DOCKET # 175ED2008

PLAINTIFF CITIMORTGAGE INC.

DEFENDANT BARBARA J. YOUNG  
DALE R. YOUNG

ATTORNEY FIRM GOLDBECK MCCAFFERTY & MCKEEVER

<b>PERSON/CORP TO SERVED</b>
BARBARA YOUNG
1044 WEST STREET
MIFFLINVILLE

**PAPERS TO SERVED**  
MORTGAGE FORECLOSURE

336 6285  
CALL 10 28 TUES  
8-830

SERVED UPON DALE YOUNG

RELATIONSHIP HUSBAND IDENTIFICATION \_\_\_\_\_

DATE 10-28-08 TIME 0925 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

10-23-08

0925

DONNELLY

2/1

DEPUTY

[Signature]

DATE

10-28-08



# COLUMBIA COUNTY SHERIFF'S OFFICE

## PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN  
DATE RECEIVED 10/20/2008

SERVICE# 2 - OF - 13 SERVICES  
DOCKET # 175ED2008

PLAINTIFF CITIMORTGAGE INC.

DEFENDANT BARBARA J. YOUNG

DALE R. YOUNG

ATTORNEY FIRM GOLDBECK MCCAFFERTY & MCKEEVER

**PERSON/CORP TO SERVED**

DALE YOUNG

1044 WEST STREET

MIFFLINVILLE

**PAPERS TO SERVED**

MORTGAGE FORECLOSURE

*DALE WILL CALL  
me NEXT WEEK  
10/23*

SERVED UPON DALE YOUNG

RELATIONSHIP \_\_\_\_\_ IDENTIFICATION \_\_\_\_\_

DATE 10-28-08 TIME 0925 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
<u>10-28-08</u>	<u>0925</u>	<u>DAN ELLIS</u>	<u>L/C</u>

DEPUTY  DATE 10-28-08



October 24, 2008

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

**CITIMORTGAGE**

**VS.**

**BARBARA J. YOUNG**  
**DALE R. YOUNG**

**DOCKET # 175ED2008**

**JD # 1612JD2006**

Dear Timothy:

The amount due on sewer account #705100 for the property located at 1044 West Street Mifflinville, Pa through March 31, 2009 is \$286.02.

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

Sincerely,

Kelly Greer  
 Authority Clerk

# COLUMBIA COUNTY SHERIFF'S OFFICE

## PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN  
DATE RECEIVED 10/20/2008

SERVICE# 4 - OF - 13 SERVICES  
DOCKET # 175ED2008

PLAINTIFF CITIMORTGAGE INC.

DEFENDANT BARBARA J. YOUNG  
DALE R. YOUNG

ATTORNEY FIRM GOLDBECK MCCAFFERTY & MCKEEVER

**PERSON/CORP TO SERVED**

MIFFLIN WATER AUTHORITY-C/O CURT  
MOOREHEAD  
2ND STREET  
MIFFLINVILLE

**PAPERS TO SERVED**

MORTGAGE FORECLOSURE

SERVED UPON CURT MOOREHEAD

RELATIONSHIP Curt Moorehead IDENTIFICATION \_\_\_\_\_

DATE 10.23.08 TIME 14.55 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) \_\_\_\_\_

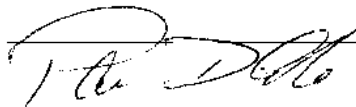
ATTEMPTS  
DATE

TIME

OFFICER

REMARKS

DEPUTY



DATE 10.23.08

# COLUMBIA COUNTY SHERIFF'S OFFICE

## PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN  
DATE RECEIVED 10/20/2008

SERVICE# 5 - OF - 13 SERVICES  
DOCKET # 175ED2008

PLAINTIFF CITIMORTGAGE INC.

DEFENDANT BARBARA J. YOUNG  
DALE R. YOUNG

ATTORNEY FIRM GOLDBECK MCCAFFERTY & MCKEEVER

**PERSON/CORP TO SERVED**

SUSAN NEVEL-TAX COLLECTOR

226 E 5TH STREET

MIFFLINVILLE

**PAPERS TO SERVED**

MORTGAGE FORECLOSURE

SERVED UPON

*POITTO*

RELATIONSHIP

IDENTIFICATION

DATE *10-23-08*

TIME

*0935*

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

*Pam DeLo*

DATE

*10-23-08*

# COLUMBIA COUNTY SHERIFF'S OFFICE

## PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN  
DATE RECEIVED 10/20/2008

SERVICE# 6 - OF - 13 SERVICES  
DOCKET # 175ED2008

PLAINTIFF CITIMORTGAGE INC.

DEFENDANT BARBARA J. YOUNG  
DALE R. YOUNG

ATTORNEY FIRM GOLDBECK MCCAFFERTY & MCKEEVER

PERSON/CORP TO SERVED
BERWICK SEWER
1108 FREAS AVENUE
BERWICK

PAPERS TO SERVED

MORTGAGE FORECLOSURE

SERVED UPON KELLY GREEN

RELATIONSHIP \_\_\_\_\_ IDENTIFICATION \_\_\_\_\_

DATE 10-23-08 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

Tom DeB

DATE 10-23-08

# COLUMBIA COUNTY SHERIFF'S OFFICE

## PROCESS SERVICE ORDER

OFFICER:  
DATE RECEIVED 10/20/2008

SERVICE# 10 - OF - 13 SERVICES  
DOCKET # 175ED2008

PLAINTIFF CITIMORTGAGE INC.

DEFENDANT BARRARA J. YOUNG

ATTORNEY FIRM

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

SERVED UPON Deb

RELATIONSHIP Clerk

DATE 10-22-08 TIME 1:40

Race \_\_\_ Sex \_\_\_ Height \_\_\_

TYPE OF SERVICE: A. PER  
B. HO  
C. CO  
D. RE  
E. NO

F. OT

ATTEMPTS  
DATE

TIME

DEPUTY

DATE 10-22-08

# 752-5295  
Sue  
Narel

Feb. 11, 2005. 28

Rehove Tax

Penalty

Barb + Dale Young

Military \_\_\_

CCSO \_\_\_  
AT POA

VICE

KS

# COLUMBIA COUNTY SHERIFF'S OFFICE

## PROCESS SERVICE ORDER

OFFICER:  
DATE RECEIVED 10/20/2008

SERVICE# 7 - OF - 13 SERVICES  
DOCKET # 175ED2008

PLAINTIFF CITIMORTGAGE INC.

DEFENDANT BARBARA J. YOUNG  
DALE R. YOUNG

ATTORNEY FIRM GOLDBECK MCCAFFERTY & MCKEEVER

PERSON/CORP TO SERVED

DOMESTIC RELATIONS

15 PERRY AVE.

BLOOMSBURG

PAPERS TO SERVED

MORTGAGE FORECLOSURE

SERVED UPON MAUREEN COK

RELATIONSHIP Customer Service IDENTIFICATION \_\_\_\_\_

DATE 10-22-08 TIME 1430 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 10-22-08

COUNTY OF COLUMBIA  
REAL ESTATE TAX CERTIFICATION

Date: 10/22/2008

Fee: \$5.00

Cert. NO: 5310

YOUNG DALE R & BARBARA J  
1044 WEST STREET  
MIFFLINVILLE PA 18631

District: MIFFLIN TWP  
Deed: 20041 -0846  
Location: 1017 A WEST ST  
Parcel Id: 23 -05F-028-05,000

Assessment: 40,485  
Balances as of 10/22/2008

YEAR	TAX TYPE	TAX AMOUNT	PENALTY	DISCOUNT	PAID	BALANCE
	NO TAX CLAIM TAXES DUE					

By: Timothy T. Chamberlain, Sheriff Per: d/m.



# REAL ESTATE OUTLINE

ED # 175-08

DATE RECEIVED 10-20-08  
DOCKET AND INDEX 10-22-08

## CHECK FOR PROPER INFO.

WRIT OF EXECUTION	<u>✓</u>	
COPY OF DESCRIPTION	<u>✓</u>	
WHEREABOUTS OF LKA	<u>✓</u>	
NON-MILITARY AFFIDAVIT	<u>✓</u>	
NOTICES OF SHERIFF SALE	<u>✓</u>	
WAIVER OF WATCHMAN	<u>✓</u>	
AFFIDAVIT OF LIENS LIST	<u>✓</u>	
CHECK FOR \$1,350.00 OR <u>2000.00</u>	<u>✓</u>	CK# <u>355670</u>

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

SALE DATE	<u>Feb. 4 09</u>	TIME <u>1:00</u>
POSTING DATE	<u>Jan 5 09</u>	
ADV. DATES FOR NEWSPAPER	1 <sup>ST</sup> WEEK <u>Jan 4</u>	
	2 <sup>ND</sup> WEEK <u>21</u>	
	3 <sup>RD</sup> WEEK <u>28 09</u>	

# SHERIFF'S SALE

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WEDNESDAY FEBRUARY 4, 2009 AT 10:00 AM

---

BY VIRTUE OF A WRIT OF EXECUTION NO. 175 OF 2008 ED AND CIVIL WRIT NO. 1612 OF 2006 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:

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All that certain piece, parcel and tract of land located in the Village of Mifflinville, Township of Mifflin, County of Columbia and State of Pennsylvania, said parcel being Lot No. 7 of a subdivision recorded in Columbia County Map Book No. 4, page 356, bounded and described as follows, to wit: Beginning at a point in line of land of Hudelson and Lot No. 8; Thence along Lot No. 8 North (erroneously described as west in the prior deed to the chain of title) 196 feet to a point in line of Lot No. 2; thence along Lot No. 2 North 23 degrees 45 minutes West 110 feet to appoint in line of Lot No. 6; thence along Lot No. 6 South 66 degrees 15 minutes West 196 feet to a point in line of land of Hudelson; thence along land of Hudelson South 23 degrees 45 minutes East 110 feet to a point, the place of beginning. Said parcel being Lot No. 7 of a sub-division recorded in the Office of the Recording of Deeds in and for Columbia County in Map Book No. 4, page 356, and containing 21,560 square feet. This description was prepared from a draft of survey made by Orangeville Surveying Consultants dated April 26, 1977.

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For the consideration hereinabove specified, Grantor does further grant unto Grantees, their successors and assigns, an access right-of-way as shown on the aforesaid subdivision plan recorded in Columbia County Map Book No. 4, page 356, said access right-of-way being twenty (20) feet in width and extending two hundred (200) feet along the common boundary of Lots Nos. 1, and 2. Said access right-of-way shall be appurtenant to Lots Nos. 1,2,7 and 8 and shall be used for perpetual ingress and egress to and from Lots Nos. 1,2,7 and 8 and shall be maintained jointly by the owners of Lots Nos. 1,2,7 and 8, their successors and assigns.

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TAX PARCEL #: 23-05F-028-05

**PROPERTY ADDRESS: 1044 WEST STREET, MIFFLINVILLE, PA, 18631**

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Plaintiff's Attorney  
Michael McKeever  
701 Market Street  
Philadelphia, PA 19106

Sheriff of Columbia County  
Timothy T. Chamberlain  
[www.sheriffofcolumbiacounty.com](http://www.sheriffofcolumbiacounty.com)

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Michael McKeever  
701 Market Street  
Philadelphia, PA 19106

Sheriff of Columbia County  
Timothy T. Chamberlain  
[www.sheriffofcolumbiacounty.com](http://www.sheriffofcolumbiacounty.com)

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Sheriff of Columbia County  
Timothy T. Chamberlain  
[www.sheriffofcolumbiacounty.com](http://www.sheriffofcolumbiacounty.com)

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

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

vs.

BARBARA J. YOUNG  
DALE R. YOUNG  
1044 West Street  
Mifflinville, PA 18631

In the Court of Common Pleas of  
Columbia County

No. 2006-CV-1612

*2008-ED-175*  
WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Columbia

To the Sheriff of Columbia County, Pennsylvania

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

PREMISES: 1044 West Street Mifflinville, PA 18631

See Exhibit "A" attached

AMOUNT DUE	<u>\$141,600.14</u>
Interest From 12/20/2006 Through Date of Sale	<u>                    </u>
(Costs to be added)	<u>                    </u>

Dated: 10-20-08

Tami B. Kline  
Prothonotary, Common Pleas Court  
of Columbia County, Pennsylvania

Deputy Kelly P. Brewer



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TAX PARCEL #: 23-05F-028-05

PROPERTY ADDRESS: 1044 WEST STREET, MIFFLINVILLE, PA, 18631



Goldbeck McCafferty & McKeever  
BY: Michael T. McKeever  
Attorney I.D. #56129  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

Plaintiff

vs.

BARBARA J. YOUNG  
DALE R. YOUNG  
**(Mortgagor(s) and Record Owner(s))**  
1044 West Street  
Mifflinville, PA 18631

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Columbia County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2006-CV-1612

*2008-ED 175*

**AFFIDAVIT PURSUANT TO RULE 3129**

CITIMORTGAGE INC., Plaintiff in the above action, by its attorney, Michael T. McKeever, Esquire, sets forth as of the date the praecipe for the writ of execution was filed the following information concerning the real property located at:

1044 West Street  
Mifflinville, PA 18631

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

BARBARA J. YOUNG  
1044 West Street  
Mifflinville, PA 18631

DALE R. YOUNG  
1044 West Street  
Mifflinville, PA 18631

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

BARBARA J. YOUNG  
1044 West Street  
Mifflinville, PA 18631

DALE R. YOUNG  
1044 West Street  
Mifflinville, PA 18631

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

DOMESTIC RELATIONS OF COLUMBIA COUNTY  
PO Box 380  
Bloomsburg, PA 17815

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement  
Health and Welfare Bldg. - Room 432  
Harrisburg, PA 17105-2675

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

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

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

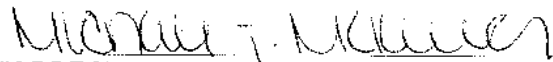
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale.

TENANTS/OCCUPANTS  
1044 West Street  
Millinville, PA 18631

(attach separate sheet if more space is needed)

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.

DATED: October 10, 2008

  
GOLDBECK McCafferty & McKeever  
BY: Michael T. McKeever, Esq.  
Attorney for Plaintiff

Goldbeck McCafferty & McKeever  
BY: Michael T. McKeever  
Attorney I.D. #56129  
Suite 5000 – Mellon Independence Center  
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Defendant(s)

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CIVIL ACTION - LAW

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No. 2006-CV-1612

*2008-ED-175*

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Philadelphia, PA 19106-1532  
215-825-6318  
Attorney for Plaintiff

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481  
Plaintiff

vs.

BARBARA J. YOUNG  
DALE R. YOUNG  
Mortgagor(s) and Record Owner(s)

1044 West Street  
Mifflinville, PA 18631

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Columbia County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term

No. 2006-CV-1612

*2008-ED-175*

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE.**

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

TO: YOUNG, BARBARA J  
**BARBARA J. YOUNG**  
1044 West Street  
Mifflinville, PA 18631

Your house at 1044 West Street, Mifflinville, PA 18631 is scheduled to be sold at Sheriff's Sale on \_\_\_\_\_, at 9:30 AM, in Sheriff's Office, Courthouse, Bloomsburg, PA to enforce the court judgment of \$141,600.14 obtained by CITIMORTGAGE INC. against you.

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

To prevent this Sheriff's Sale you must take immediate action:

1. The sale will be cancelled if you pay to CITIMORTGAGE INC., the back payments, late charges, costs and reasonable attorney's fees due. To find out how much you must pay call: 215-825-6329 or 1-866-413-2311.
2. You may be able to stop the sale by filing a petition asking the Court to strike or open judgment, if the judgment was improperly entered. You may also ask the Court to postpone the sale for good cause.

3. You may also be able to stop the sale through other legal proceedings.
4. You may need an attorney to assert your rights. The sooner you contact one, the more chance you will have of stopping the sale. (See notice below on how to obtain an attorney).

**YOU MAY STILL BE ABLE TO SAVE YOUR PROPERTY AND YOU HAVE OTHER RIGHTS  
EVEN IF THE SHERIFF'S SALE DOES NOT 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 price by calling the Sheriff of Columbia County at 570-389-5622.
2. You may be able to petition the Court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.
3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened, you may call the Sheriff of Columbia County at 570-389-5622.
4. If the amount due from the Buyer is not paid to the Sheriff, you will remain the owner of the property as if the sale never happened.
5. You have a right to remain in the property until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.
6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money bid for your house will be filed by the Sheriff within thirty (30) days from the date of the Sheriff's Sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days after the schedule of distribution is filed.
7. You may also have other rights and defenses, or ways of getting your house back, if you act immediately after the sale.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE LISTED BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

NORTH PENN LEGAL SERVICES F/K/A SUSQUEHANNA LEGAL SERVICES  
168 E. 5th Street  
Bloomsburg, PA 17815  
717-784-8760  
PENNSYLVANIA BAR ASSOCIATION  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375



Resources available for Homeowners in Foreclosure

**ACT NOW!**

Even though your lender (and our client) has filed an Action of Mortgage Foreclosure against you, you still may be able to SAVE YOUR HOME FROM FORECLOSURE.

- 1). Call an attorney. For referrals to a qualified attorney call either of the following numbers: 717-784-8760 or 800-692-7375.
- 2). Call the Consumer Credit Counseling Agency at 1-800-989-2227 for free counseling.
- 3). Visit HUD'S website [www.hud.gov](http://www.hud.gov) for Help for Homeowners Facing the Loss of Their Homes.
- 4). Pennsylvania Housing Finance Agency also offers other loan programs that may assist homeowners in default. Please See the PHFA website: <http://www.phfa.org/consumers/homeowners/real.aspx>.
- 5). Call the Plaintiff (your lender) at and ask to speak to someone about Loss Mitigation or Home Retention options.
- 6). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout / Home Retention Package. Call our toll free number at 1-866-413-2311 or via email at [homeretention@goldbecklaw.com](mailto:homeretention@goldbecklaw.com). Call Seth at 215-825-6329 or fax 215-825-6429. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is David Fein who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of FN-1015.

Para informacion en espanol puede comunicarse con Loretta al 215-825-6344.

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Michael T. McKeever  
Attorney L.D.#56129  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532  
215-825-6318  
Attorney for Plaintiff

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481  
Plaintiff

vs.

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DALE R. YOUNG  
Mortgagor(s) and Record Owner(s)

1044 West Street  
Mifflinville, PA 18631

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Columbia County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 2006-CV-1612

*2008-ED-175*

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**DALE R. YOUNG**  
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Mifflinville, PA 18631

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P.O. Box 186  
Harrisburg, PA 17108  
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- 6). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout / Home Retention Package. Call our toll free number at 1-866-413-2311 or via email at [homeretention@goldbecklaw.com](mailto:homeretention@goldbecklaw.com). Call Seth at 215-825-6329 or fax 215-825-6429. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is David Fein who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of FN-1015.

Para informacion en espanol puede comunicarse con Loretta al 215-825-6344.

Michael T. McKeever  
Attorney I.D. #56129  
Suite 5000 Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

Plaintiff

vs.

BARBARA J. YOUNG  
DALE R. YOUNG  
**Mortgagor(s) and Record Owner(s)**  
1044 West Street  
Mifflinville, PA 18631

Defendant(s)

IN THE COURT OF  
COMMON PLEAS

of Columbia County

CIVIL ACTION - LAW

ACTION OF  
MORTGAGE FORECLOSURE

NO. 2006-CV-1612

*2008-ED-175*

**CERTIFICATION AS TO THE SALE OF REAL PROPERTY**

I, Michael T. McKeever, Esquire hereby certify that I am the attorney of record for the Plaintiff in this action, and I further certify that this property is subject to Act 91 of 1983 and the Plaintiff has complied with all the provisions of the Act.

*Michael T. McKeever*  
Michael T. McKeever  
Attorney for plaintiff

GOLDBECK McCAFFERTY & McKEEVER  
BY: Michael T. McKeever  
Attorney I.D.#56129  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

CITIMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

Plaintiff

vs.

BARBARA J. YOUNG  
DALE R. YOUNG  
Mortgagor(s) and Record Owner(s)

1044 West Street  
Millinville, PA 18631

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Columbia County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2006-CV-1612

*2008-ED-175*

**WAIVER OF WATCHMAN**

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

*Michael T. McKeever*  
BY: Michael T. McKeever  
Attorney for Plaintiff

GOLDBECK McCAFFERTY & McKEEVER

BY: Michael T. McKeever

Attorney I.D.#56129

Suite 5000 - Mellon Independence Center

701 Market Street

Philadelphia, PA 19106

215-627-1322

Attorney for Plaintiff

CITIMORTGAGE INC.

PO Box 9481

Mail Code: 22-528-1011

Gaithersburg, MD 20898-9481

Plaintiff

vs.

BARBARA J. YOUNG

DALE R. YOUNG

Mortgagor(s) and Record Owner(s)

1044 West Street

Millinville, PA 18631

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Columbia County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2006-CV-1612

*2008-ED-175*

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*Michael T. McKeever*

BY: Michael T. McKeever

Attorney for Plaintiff

GOLDBECK McCAFFERTY & McKEEVER  
BY: Michael T. McKeever  
Attorney I.D.#56129  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

CHMORTGAGE INC.  
PO Box 9481  
Mail Code: 22-528-1011  
Gaithersburg, MD 20898-9481

Plaintiff

vs.

BARBARA J. YOUNG  
DALE R. YOUNG  
Mortgagor(s) and Record Owner(s)

1044 West Street  
Mifflinville, PA 18631

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Columbia County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2006-CV-1612

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*Michael T. McKeever*  
BY: Michael T. McKeever  
Attorney for Plaintiff



All that certain piece, parcel and tract of land located in the Village of Mifflinville, Township of Mifflin, County of Columbia and State of Pennsylvania, said parcel being Lot No. 7 of a subdivision recorded in Columbia County Map Book No. 4, page 356, bounded and described as follows, to wit:

Beginning at a point in line of land of Hudelson and Lot No. 8; Thence along Lot No. 8 North (erroneously described as west in the prior deed to the chain of title) 196 feet to a point in line of Lot No. 2; thence along Lot No. 2 North 23 degrees 45 minutes West 110 feet to appoint in line of Lot No. 6; thence along Lot No. 6 South 66 degrees 15 minutes West 196 feet to a point in line of land of Hudelson; thence along land of Hudelson South 23 degrees 45 minutes East 110 feet to a point, the place of beginning. Said parcel being Lot No. 7 of a sub-division recorded in the Office of the Recording of Deeds in and for Columbia County in Map Book No. 4, page 356, and containing 21,560 square feet. This description was prepared from a draft of survey made by Orangeville Surveying Consultants dated April 26, 1977.

The above transfer is made subject to easement rights granted to the Pennsylvania Power & Light Company for the installation of power lines and maintenance of same as well as easement rights granted to the Mifflin Township Water Authority for the installation of water lines in said development.

This conveyance is made subject to an access right-of-way as shown on the aforesaid sub-division plan recorded in Columbia County Map Book No. 4, page 356, said access right-of-way being ten (10) feet in width and extending sixty (60) feet along the Southern boundary of Lot No. 7. Said access right-of-way shall be appurtenant to Lots Nos. 7 and 8 and shall be used for perpetual ingress and egress to and from Lots Nos. 7 and 8 and shall be maintained jointly by the owners of Lots Nos. 7 and 8, their successors and assigns.

For the consideration hereinabove specified, Grantor does further grant unto Grantees, their successors and assigns, an access right-of-way as shown on the aforesaid subdivision plan recorded in Columbia County Map Book No. 4, page 356, said access right-of-way being twenty (20) feet in width and extending two hundred (200) feet along the common boundary of Lots Nos. 1, and 2. Said access right-of-way shall be appurtenant to Lots Nos. 1, 2, 7 and 8 and shall be used for perpetual ingress and egress to and from Lots Nos. 1, 2, 7 and 8 and shall be maintained jointly by the owners of Lots Nos. 1, 2, 7 and 8, their successors and assigns.

This conveyance is hereby made subject to the same exceptions, restrictions, conditions, waivers, reservations, easements and rights-of-way as are contained in prior deeds or other instruments forming the chain of title to said premises, including the subdivision plan recorded in Columbia County Map Book No. 4, page 356.

TAX PARCEL #: 23-05F-028-05

PROPERTY ADDRESS: 1044 WEST STREET, MIFFLINVILLE, PA, 18631

All that certain piece, parcel and tract of land located in the Village of Mifflinville, Township of Mifflin, County of Columbia and State of Pennsylvania, said parcel being Lot No.7 of a subdivision recorded in Columbia County Map Book No. 4, page 356, bounded and described as follows, to wit:

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The above transfer is made subject to easement rights granted to the Pennsylvania Power & Light Company for the installation of power lines and maintenance of same as well as easement rights granted to the Mifflin Township Water Authority for the installation of water lines in said development.

This conveyance is made subject to an access right-of-way as shown on the aforesaid sub-division plan recorded in Columbia County Map Book No. 4, page 356, said access right-of-way being ten (10) feet in width and extending sixty (60) feet along the Southern boundary of Lot No. 7. Said access right-of-way shall be appurtenant to Lots Nos. 7 and 8 and shall be used for perpetual ingress and egress to and from Lots Nos. 7 and 8 and shall be maintained jointly by the owners of Lots Nos. 7 and 8, their successors and assigns.

For the consideration hereinabove specified, Grantor does further grant unto Grantees, their successors and assigns, an access right-of-way as shown on the aforesaid subdivision plan recorded in Columbia County Map Book No. 4, page 356, said access right-of-way being twenty (20) feet in width and extending two hundred (200) feet along the common boundary of Lots Nos. 1, and 2. Said access right-of-way shall be appurtenant to Lots Nos. 1, 2, 7 and 8 and shall be used for perpetual ingress and egress to and from Lots Nos. 1, 2, 7 and 8 and shall be maintained jointly by the owners of Lots Nos. 1, 2, 7 and 8, their successors and assigns.

This conveyance is hereby made subject to the same exceptions, restrictions, conditions, waivers, reservations, easements and rights-of-way as are contained in prior deeds or other instruments forming the chain of title to said premises, including the subdivision plan recorded in Columbia County Map Book No. 4, page 356.

TAX PARCEL #: 23-05F-028-05

PROPERTY ADDRESS: 1044 WEST STREET, MIFFLINVILLE, PA, 18631

# SHERIFF'S DEPARTMENT COLUMBIA COUNTY

SHERIFF SERVICE INSTRUCTIONS		
PLAINTIFF/S/ CITIMORTGAGE INC.		COURT NUMBER 2006-CV-1612
DEFENDANT/S/ BARBARA J. YOUNG and DALE R. YOUNG		TYPE OF WRIT OR COMPLAINT EXECUTION

SERVE



AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVICE  
DALE R. YOUNG

ADDRESS (Street or Road, Apartment No., City, Boro, Twp., State and ZIP Code)  
1044 West Street, Mifflinville, PA 18631

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE:

**PLEASE SERVE THE ABOVE DEFENDANT OR PERSON IN CHARGE**

SIGNATURE OF ATTORNEY

*Michael T. McKeever*

TELEPHONE NUMBER

(215) 627-1322

DATE

October 10, 2008

ADDRESS OF ATTORNEY

GOLDBECK McCAFFERTY & McKEEVER  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106

# SHERIFF'S DEPARTMENT COLUMBIA COUNTY

SHERIFF SERVICE INSTRUCTIONS		
PLAINTIFF/S/ CITIMORTGAGE INC.		COURT NUMBER 2006-CV-1612
DEFENDANT/S/ BARBARA J. YOUNG and DALE R. YOUNG		TYPE OF WRIT OR COMPLAINT EXECUTION

SERVE



AT

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVICE  
BARBARA J. YOUNG

ADDRESS (Street or Road, Apartment No., City, Boro, Twp., State and ZIP Code)  
1044 West Street, Mifflinville, PA 18631

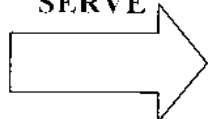
SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE:

**PLEASE SERVE THE ABOVE DEFENDANT OR PERSON IN CHARGE**

SIGNATURE OF ATTORNEY <b>Michael T. McKeever</b>	TELEPHONE NUMBER (215) 627-1322	DATE October 10, 2008
ADDRESS OF ATTORNEY  GOLDBECK McCAFFERTY & McKEEVER Suite 5000 – Mellon Independence Center 701 Market Street Philadelphia, PA 19106		

# SHERIFF'S DEPARTMENT COLUMBIA COUNTY

<b>SHERIFF SERVICE INSTRUCTIONS</b>		
PLAINTIFF/S/ CITIMORTGAGE INC.		COURT NUMBER 2006-CV-1612
DEFENDANT/S/ BARBARA J. YOUNG and DALE R. YOUNG		TYPE OF WRIT OR COMPLAINT EXECUTION

**SERVE**  
  
**AT**

NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC., TO SERVICE  
BARBARA J. YOUNG & DALE R. YOUNG

ADDRESS (Street or Road, Apartment No., City, Boro, Twp., State and ZIP Code)  
1044 West Street, Mifflinville, PA 18631

SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE:

**PLEASE POST HANDBILL**

SIGNATURE OF ATTORNEY

***Michael T. McKeever***

TELEPHONE NUMBER

(215) 627-1322

DATE

October 10, 2008

ADDRESS OF ATTORNEY

GOLDBECK McCafferty & McKEEVER  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106



**GOLDBECK McCAFFERTY & McKEEVER  
A PROFESSIONAL CORPORATION**

SUITE 5000, MELLON INDEPENDENCE CENTER  
701 MARKET ST. PHILADELPHIA, PA 19106  
(215) 627-1322

**FIRSTTRUST**

800.220.BANK / firsttrust.com

3-7380-2360

10/10/2008

355670

PAY  
TO THE  
ORDER OF

**SHERIFF OF COLUMBIA COUNTY**

\$ \*\*2,000.00

TWO THOUSAND AND XX / 100

DOLLARS

*Sheriff's Office*

*PO Box 380*

*Bloomsburg PA, 17815*

MORTGAGE DISBURSEMENT ACCOUNT

MEMO

*Young*

  
AUTHORIZED SIGNATURE

⑈ 355670⑈ ⑆ 236073801⑆ 70 1100018⑈