

# SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain  
Sheriff

Earl D. Mordan, Jr.  
Chief Deputy



M & T BANK  
vs.  
JOHN R MORGANS

Case Number  
2011CV1291

## REAL ESTATE SALE REQUEST LEDGER

DATE	CATEGORY	MEMO	CHK #	DEBIT	CREDIT
10/31/2011	Advance Fee	Advance Fee	61197	\$0.00	\$2,000.00
10/31/2011	Advertising Sale (Newspaper)			\$15.00	\$0.00
10/31/2011	Advertising Sale Bills & Copies			\$17.50	\$0.00
10/31/2011	Crying Sale			\$10.00	\$0.00
10/31/2011	Docketing			\$15.00	\$0.00
10/31/2011	Levy			\$15.00	\$0.00
10/31/2011	Mailing Costs			\$66.00	\$0.00
10/31/2011	Posting Handbill			\$15.00	\$0.00
10/31/2011	Press Enterprise Inc.			\$1,364.82	\$0.00
10/31/2011	Sheriff Automation Fund			\$50.00	\$0.00
10/31/2011	Web Posting			\$100.00	\$0.00
02/01/2012	Service			\$240.00	\$0.00
02/01/2012	Service Mileage			\$6.00	\$0.00
02/01/2012	Copies			\$8.00	\$0.00
02/01/2012	Notary Fee			\$10.00	\$0.00
02/01/2012	Tax Claim Search			\$5.00	\$0.00
02/01/2012	Surcharge			\$170.00	\$0.00
				<b>\$2,107.32</b>	<b>\$2,000.00</b>

**TOTAL BALANCE: \$(107.32)**

*Due ↑*

MCCABE, WEISBERG & CONWAY, P.C.

ATTORNEYS AT LAW

123 S. BROAD STREET SUITE 1400

PHILADELPHIA, PA 19109

(215) 790-1010



3 50310

WELLS  
FARGO

NO.

173975

PAY One Hundred Seven \*\*\*\*\* 32/100

DATE

Sep/17/2012

AMOUNT

\$107.32

ATTORNEY'S ACCOUNT  
VOID AFTER 90 DAYS

TO THE Sheriff of Columbia County

ORDER

OF

Balance Due Sheriff 287-0483

⑈173975⑈ ⑆031000503⑆ 2000012430048⑈

PO Box 380  
Bloomsburg, PA 17815

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

**COLUMBIA COUNTY  
SHERIFF'S OFFICE  
TIMOHTY T. CHAMBERLAIN, SHERIFF**

# Fax

**To:** Daniel DellaPenna

**From:** Sheriff Timothy T. Chamberlain

**Fax:**

**Pages:** 2

**Phone:**

**Date:** September 14, 2012 (2<sup>nd</sup> fax)

**Re:** Morgans

**CC:**

☐ **Urgent**    ☐ **For Review**    ☐ **Please Comment**    ☐ **Please Reply**    ☐ **Please Recycle**

---

● **Comments:** I received your letter requesting a stay. Attached is a cost sheet showing a balance of \$107.32.

---

# SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain  
Sheriff

Earl D. Mordan, Jr.  
Chief Deputy



M & T BANK  
vs.  
JOHN R MORGANS

Case Number  
2011CV1291

## REAL ESTATE SALE REQUEST LEDGER

<u>DATE</u>	<u>CATEGORY</u>	<u>MEMO</u>	<u>CHK #</u>	<u>DEBIT</u>	<u>CREDIT</u>
10/31/2011	Advance Fee	Advance Fee	61197	\$0.00	\$2,000.00
10/31/2011	Advertising Sale (Newspaper)			\$15.00	\$0.00
10/31/2011	Advertising Sale Bills & Copies			\$17.50	\$0.00
10/31/2011	Crying Sale			\$10.00	\$0.00
10/31/2011	Docketing			\$15.00	\$0.00
10/31/2011	Levy			\$15.00	\$0.00
10/31/2011	Mailing Costs			\$66.00	\$0.00
10/31/2011	Posting Handbill			\$15.00	\$0.00
10/31/2011	Press Enterprise Inc.			\$1,364.82	\$0.00
10/31/2011	Sheriff Automation Fund			\$50.00	\$0.00
10/31/2011	Web Posting			\$100.00	\$0.00
02/01/2012	Service			\$240.00	\$0.00
02/01/2012	Service Mileage			\$6.00	\$0.00
02/01/2012	Copies			\$8.00	\$0.00
02/01/2012	Notary Fee			\$10.00	\$0.00
02/01/2012	Tax Claim Search			\$5.00	\$0.00
02/01/2012	Surcharge			\$170.00	\$0.00
				\$2,107.32	\$2,000.00

**TOTAL BALANCE: \$(107.32)**

*Due 7*

TERENCE J. MCCABE  
 MARK S. WEISBERG  
 EDWARD J. CONWAY  
 KENNETH GARY  
 LISA A. WALLACE  
 CAITRA M. O'SULLIVAN  
 JANE Z. CHARLTON  
 GAYLE E. SPICAR  
 JASON E. BROOKS  
 ANDREW L. MARKOWITZ  
 MICHAEL J. CANTRELL  
 JOSEPH E. RIGA  
 CAROL ROBERTS CUBB  
 CATHERINE E. WILKER  
 HEIDI R. SPICAR  
 DIANA C. THOMPSON  
 MARISA J. COHEN  
 MARK GUNAS  
 ROBERT L. CAMPBELL  
 MELISSA A. MORALES  
 BRIAN T. LEMANA  
 CORIN M. DEKENT  
 ANNE E. SWARTZ  
 BRUCE J. MARDIN  
 MATTHEW L. RUSSELL  
 ERIC M. GRANT  
 RICHARD O'BRIEN  
 LAURA T. CURRY  
 ANTONETTE L. MOORE  
 KEVIN T. MCCABE  
 ALEXANDRA T. GARCIA  
 MICHAEL T. ROZKA  
 JONATHAN BLUFANT  
 LAURA L. CATTA  
 ADRI K. MYSYKIAN  
 CHRISTINE L. GRAHAM  
 SERRA C. ENCRESSER  
 JESSIE HASHIN  
 JONATHAN POLLOCK  
 KARENNA E. PORCH  
 RICHARD J. NELSON JR.  
 HEATHER M. WERNER  
 LUCAS M. ANDERSON  
 VAN B. FARABULL  
 WILLIAM D. JENNINGS

LAW OFFICES  
**McCABE, WEISBERG & CONWAY, P.C.**

SUITE 1400  
 123 SOUTH BROAD STREET  
 PHILADELPHIA, PA 19109  
 (215) 790-1010  
 FAX (215) 790-1274

August 6, 2012

SUITE 303  
 216 HADDON AVENUE  
 WESTMONT, NEW JERSEY  
 (908) 836-2000  
 FAX (908) 836-2020

SUITE 210  
 145 HIGHTSTREET  
 NEW ROCHELLE, NY 10801  
 (914) 966-8900  
 GENERAL FAX (914) 966-8901

SUITE 800  
 312 MARSHALL AVENUE  
 LAUREL, MD 20707  
 (301) 490-3361  
 FAX (301) 490-1508  
 ALSO SERVING THE DISTRICT OF COLUMBIA

SUITE 202  
 403 UNIVERSITY DRIVE  
 FAIRFAX, VA 22034  
 (800) 650-9372

SUITE 100  
 30 RIVINGTON PARKWAY  
 STAMFORD, CT 06905  
 (203) 222-8200  
 FAX (203) 222-1229

SUITE 130  
 DELAWARE CORPORATE CENTER I  
 ONE EIGHT PARKWAY  
 WILMINGTON, DELAWARE 19803  
 (302) 499-5520  
 FAX (302) 425-1900

Timothy T. Chamberlain  
 Columbia County Courthouse  
 35 West Main Street  
 Bloomsburg, Pennsylvania 17815

Re: M&T Bank f/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank vs.  
 John R. Morgans  
 Columbia; C.C.P. No. 2001CV1291  
 Premises: 28 West 4th Street, Bloomsburg, Pennsylvania 17815

Dear Sheriff:

As you know, the above-captioned matter is currently scheduled for the **August 8, 2012 Sheriff's Sale**. I am requesting at this time that you stay this sale. **Defendant filed a Chapter 13 bankruptcy on August 6, 2012 in the MIDDLE District of PA., under # 12-04596.**

In addition, please return the Writ to the Prothonotary and forward any refund due my client.

As acknowledgment of this stay, I would appreciate your signing or time-stamping a copy of this letter and faxing the same to my attention. Thank you for your cooperation.

Very truly yours,

  
 Daniel DellaPenna, Legal Assistant

/ddp

SENT VIA FACSIMILE TRANSMITTAL--NUMBER 570-389-5625  
 SHERIFF'S OFFICE RECEIVED BY:

  
 SIGNATURE

8-7-12  
 DATE

*This is a communication from a debt collector.*

*This letter may be an attempt to collect a debt and any information obtained will be used for that purpose.*

# SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain  
Sheriff

Earl D. Mordan, Jr.  
Chief Deputy



## Plaintiff

M & T BANK

## Defendant

JOHN R MORGANS

vs.

### Attorney for the Plaintiff:

MCCABE, WEISBERG & CONWAY PC  
123 S. BROAD STREET  
SUITE 2080  
PHILADELPHIA, PA 19109

Sheriff's Sale Date: Wednesday, August 8, 2012

Writ of Execution No. : 2011CV1291

Advance Sheriff Costs: \$2,000.00

Location of the real estate: 28 WEST 4TH STREET, BLOOMSBURG, PA 17815

## Sheriff Costs

Advertising Sale (Newspaper)	\$15.00
Advertising Sale Bills & Copies	\$17.50
Crying Sale	\$10.00
Docketing	\$15.00
Levy	\$15.00
Mailing Costs	\$66.00
Posting Handbill	\$15.00
Press Enterprise Inc.	\$1,364.82
Prothonotary, Acknowledge Deed	\$10.00
Sheriff Automation Fund	\$50.00
Sheriff's Deed	\$35.00
Solicitor Services	\$75.00
Transfer Tax Form	\$25.00
Web Posting	\$100.00
Service	\$240.00
Service Mileage	\$6.00
Distribution Form	\$25.00
Copies	\$8.00
Notary Fee	\$10.00
Tax Claim Search	\$5.00
Surcharge	\$170.00

**Total Sheriff Costs \$2,277.32**

## Distribution Costs

Recording Fees	\$56.00
----------------	---------

**Total Distribution Costs \$56.00**

**Grand Total: \$2,333.32**

Sheriff's poundage cost will be calculated according to the current law and added to the Sheriffs' costs after the sale.

Columbia County Sheriff, Bloomsburg, Pennsylvania, 17815, (570) 389-5622, (570)-389-5625 (fax)

© 2007 CountySale Sheriff Telecon, Inc.

# COLUMBIA COUNTY SHERIFF'S OFFICE

## SHERIFF'S REAL ESTATE FINAL COST SHEET

MT Bank VS John Morgans

NO. 149-11 ED NO. 1291-11 JD

DATE/TIME OF SALE: Aug. 8 9am

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 \$ \_\_\_\_\_

**FAX COVER SHEET**

---

<b>To:</b>	<b>From:</b> Daniel DellaPenna <DDellaPenna@mwc-law.com>
<b>Company:</b>	<b>Date:</b> 08/06/12 03:55:49 PM
<b>Fax Number:</b> 5703895625	<b>Pages (Including cover):</b> 2
<b>Re:</b> Stay Letter/Morgans	

---

**Notes:****Daniel DellaPenna**

McCabe, Weisberg & Conway, P.C.  
Suite 1400  
123 South Broad Street  
Philadelphia, PA 19109  
DDellaPenna@mwc-law.com  
Main: (215) 790-1010  
Direct: (215) 790-5701  
Fax: (215) 790-1274

Serving PA, NJ, NY, CT, VA, MD, DC and DE

---

**CONFIDENTIALITY NOTICE:** This communication including attachments or links contained herein, if any, is intended only for the person or entity to which it is addressed and may contain confidential and/or attorney-client privileged material. Any unauthorized review, use, disclosure or distribution is **STRICTLY PROHIBITED**. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

This is a communication from a debt collector. This email may be an attempt to collect a debt and any information obtained will be used for that purpose.

---



**TELECOPY COVER SHEET****ROBERT SPIELMAN**

---

ATTORNEY AT LAW  
A PROFESSIONAL CORPORATION

---

29 EAST MAIN STREET SUITE D BLOOMSBURG PA 17815-1804 • 14 SPRUCE AVENUE WILKES BARRE PA 18705-2214

---

If there is a problem with transmission or if all pages are not received, please call 570-380-1072 for retransmission.

---

TO: Columbia County Sheriff FAX No. 389 5625  
FROM: Robert Spielman DATE: August 6, 2012  
SUBJECT: M&T Bank v Morgans

Number of pages including this cover page: 3

This message is intended only for the use of the individual or entity to which it is addressed, and may contain information that is **PRIVILEGED, CONFIDENTIAL** and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone, and return the original to us by mail without making a copy. Thank you.

Comments:

Columbia County Court of Common Pleas - Foreclosure  
2011 CV 1692

Sale scheduled for August 8

FeeDueBK, 521, CCDue, FMDueD, CREDS

**U.S. Bankruptcy Court  
Middle District of Pennsylvania (Wilkes-Barre)  
Bankruptcy Petition #: 5:12-bk-04596**

Date filed: 08/06/2012

Assigned to:  
Chapter 13  
Voluntary  
Asset

**Debtor**  
**John R Morgans**  
28 W Fourth St  
Bloomsburg, PA 17815  
COLUMBIA-PA  
SSN / ITIN: xxx-xx-6388

represented by **Robert Spielman**  
29 East Main Street  
Bloomsburg, PA 17815-1485  
570 380-1072  
Fax : 570 784-3429  
Email: [bobspielman@yahoo.com](mailto:bobspielman@yahoo.com)

**Asst. U.S. Trustee**  
**United States Trustee**  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17101  
717 221-4515

Filing Date	#	Docket Text
08/06/2012	<u>1</u>	Chapter 13 Voluntary Petition. Filing fee due in the amount of \$ 281.00 filed by Robert Spielman on behalf of John R Morgans. (Spielman, Robert) (Entered: 08/06/2012)
08/06/2012	<u>2</u>	Certificate of Credit Counseling filed by Robert Spielman on behalf of John R Morgans. (Spielman, Robert) (Entered: 08/06/2012)
08/06/2012		Receipt of Chapter 13 Voluntary Petition - case upload (5:12-bk-04596) [caseupld,1305u] ( 281.00) filing fee. Receipt number 5882276, amount \$ 281.00. (U.S. Treasury) (Entered: 08/06/2012)
08/06/2012	<u>3</u>	Chapter 13 Statement of Current Monthly Income and Disposable Monthly Income - Form 22C . Filed by Robert Spielman on behalf of John R Morgans (RE: related document(s) <u>1</u> ). (Spielman, Robert) (Entered: 08/06/2012)

08/06/2012	<u>4</u>	Matrix filed/Creditor List Uploaded. (There is no image or paper document associated with this entry.) Filed by Robert Spielman on behalf of John R Morgans (RE: related document(s) <u>1</u> ). (Spielman, Robert) (Entered: 08/06/2012)
08/06/2012	<u>5</u>	Chapter 13 Plan (Includes no Motion(s) to Avoid Liens and no Motion(s) to Value Collateral) Filed by Robert Spielman on behalf of John R Morgans (RE: related document(s) <u>1</u> ). (Spielman, Robert) (Entered: 08/06/2012)
08/06/2012	<u>6</u>	Certification of No Payment Advices Filed by Robert Spielman on behalf of John R Morgans (RE: related document(s) <u>1</u> ). (Spielman, Robert) (Entered: 08/06/2012)
08/06/2012	<u>7</u>	Certification of No Payment Advices <i>as to Non-Filing Spouse</i> Filed by Robert Spielman on behalf of John R Morgans (RE: related document(s) <u>1</u> ). (Spielman, Robert) (Entered: 08/06/2012)

PACER Service Center			
Transaction Receipt			
08/06/2012 14:59:43			
PACER Login:	rp0157	Client Code:	
Description:	Docket Report	Search Criteria:	5:12-bk-04596 Fil or Ent: filed Doc From: 0 Doc To: 99999999 Term: included Format: html
Billable Pages:	1	Cost:	0.10

M&T Bank f/k/a Manufacturers and Traders  
Trust Company s/b/m/t Franklin First Savings  
Bank

Plaintiff

v.

John R. Morgans

Defendant

COLUMBIA COUNTY  
COURT OF COMMON PLEAS

No. 2011CV1291

CLERK OF COURTS OFFICE  
COUNTY OF COLUMBIA, PA

MAY -9 A.M. 10:30

PROthonotary

**ORDER**

AND NOW, this 9 day of May, 2012, upon consideration of Plaintiff's Motion to Adjourn the Sheriff's Sale currently scheduled in the above-captioned matter for May 9, 2012, it is hereby ORDERED that the Sheriff's Sale of the property known as 28 West 4th Street, Bloomsburg, PA 17815 is adjourned to the August 8, 2012 Sheriff's Sale. It is FURTHER ORDERED that no additional advertising of said Sale is necessary and no new notice to the parties previously set forth in the Affidavit Pursuant to Pa.R.C.P. 3129 is required.

BY THE COURT:

/s/ Thomas A. James, Jr. P. J.

**McCABE, WEISBERG AND CONWAY, P.C.**

**BY: TERRENCE J. McCABE, ESQUIRE - ID # 16496**  
**MARC S. WEISBERG, ESQUIRE - ID # 17616**  
**EDWARD D. CONWAY, ESQUIRE - ID # 34687**  
**MARGARET GAIRO, ESQUIRE - ID # 34419**  
**ANDREW L. MARKOWITZ, ESQUIRE - ID # 28009**  
**HEIDI R. SPIVAK, ESQUIRE - ID # 74770**  
**MARISA J. COHEN, ESQUIRE - ID # 87830**  
**KEVIN T. MCQUAIL, ESQUIRE - ID # 307169**  
**CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480**  
**BRIAN T. LAMANNA, ESQUIRE - ID # 310321**

**Attorneys for Plaintiff**

**123 South Broad Street, Suite 2080**  
**Philadelphia, Pennsylvania 19109**  
**(215) 790-1010**

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank  
Plaintiff

v.

John R. Morgans  
Defendant

COLUMBIA COUNTY  
COURT OF COMMON PLEAS

No. 2011CV1291

CLERK OF COURT'S OFFICE  
COUNTY OF PHILADELPHIA, PA

2011-01-29 A 3:25

FILED  
RECEIVED

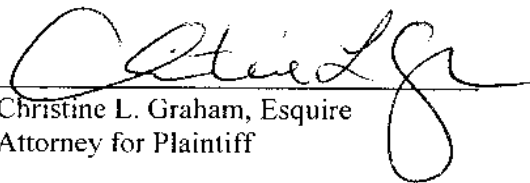
**MOTION TO ADJOURN SHERIFF'S SALE**

Plaintiff, M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank, by and through its attorneys, McCabe Weisberg and Conway, P.C., moves this Honorable Court for an Order adjourning the Sheriff's Sale scheduled for and avers as follows:

1. Plaintiff filed a Writ of Execution, as well as the Affidavit required by Pa.R.C.P. 3129, in order to list the property known as 28 West 4th Street, Bloomsburg, PA 17815 for Sheriff's Sale originally scheduled for February 8, 2012.
2. Plaintiff has postponed the Sheriff's Sale to the fullest extent permitted without requesting leave from the Court, and is now requesting that this Honorable Court allow the sale currently scheduled for May 9, 2012 to be postponed further until August 8, 2012 as Plaintiff and Defendant are working to resolve the debt.
3. Plaintiff has complied with all the pertinent statutory and procedural rules of court governing the listing of real property for Sheriff's Sale.

4. Neither the parties hereto nor the parties previously set forth in the Affidavit Pursuant to Rule 3129 will be prejudiced by the adjournment of the Sheriff's Sale .

WHEREFORE, Plaintiff prays that this Honorable Court grant an Order adjourning the Sheriff's Sale of the property known as 28 West 4th Street, Bloomsburg, PA 17815 to the August 8, 2012 Sheriff's Sale with no additional advertising of said Sale and no new notice to the parties previously set forth in the Affidavit Pursuant to Pa.R.C.P. 3129 being required, except for an announcement be made at the sale currently scheduled for May 9, 2012.

  
Christine L. Graham, Esquire  
Attorney for Plaintiff

**McCABE, WEISBERG AND CONWAY, P.C.**

**BY: TERRENCE J. McCABE, ESQUIRE - ID # 16496**  
**MARC S. WEISBERG, ESQUIRE - ID # 17616**  
**EDWARD D. CONWAY, ESQUIRE - ID # 34687**  
**MARGARET GAIRO, ESQUIRE - ID # 34419**  
**ANDREW L. MARKOWITZ, ESQUIRE - ID # 28009**  
**HEIDI R. SPIVAK, ESQUIRE - ID # 74770**  
**MARISA J. COHEN, ESQUIRE - ID # 87830**  
**KEVIN T. MCQUAIL, ESQUIRE - ID # 307169**  
**CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480**  
**BRIAN T. LAMANNA, ESQUIRE - ID # 310321**

**Attorneys for Plaintiff**

**123 South Broad Street, Suite 2080**  
**Philadelphia, Pennsylvania 19109**  
**(215) 790-1010**

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank  
Plaintiff

v.

John R. Morgans  
Defendant

COLUMBIA COUNTY  
COURT OF COMMON PLEAS

No. 2011CV1291

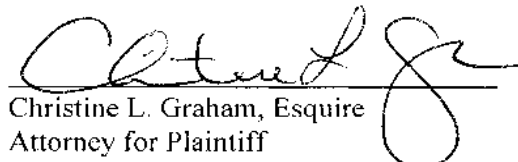
**MEMORANDUM OF LAW**

Plaintiff requested that the Sheriff's Sale originally scheduled for February 8, 2012 in this matter be continued for the legally allowable time without requesting the postponement from the Court.

Plaintiff at this time requests that the Sheriff's Sale set for May 9, 2012 be adjourned to August 8, 2012 as Plaintiff and Defendant are working to resolve the debt.

Pursuant to Pa.R.C.P. 3129.3, the Court has the discretion to adjourn a Sheriff's Sale and dispense the requirement of new notice.

WHEREFORE, Plaintiff prays that a special order of court be granted and the Sheriff's Sale of the property known as 28 West 4th Street, Bloomsburg, PA 17815 be adjourned to the August 8, 2012 Sheriff's Sale with no additional advertising of said Sale and no new notice to the parties previously set forth in the Affidavit Pursuant to Pa.R.C.P. 3129 being required, except that an announcement be made at the sale currently scheduled for May 9, 2012.

  
Christine L. Graham, Esquire  
Attorney for Plaintiff

**VERIFICATION**

The undersigned hereby certifies that she is the attorney for the Plaintiff in the within action and that she is authorized to make this verification and that the foregoing facts based on the information from the Plaintiff's representative, who is out of jurisdiction and not available to sign this verification at this time, are true and correct to the best of her knowledge, information and belief and further states that false statements herein are made subject to the penalties of 18 PA.C.S. §4904 relating to unsworn falsification to authorities.

McCabe, Weisberg and Conway, P.C.

BY: 

Christine L. Graham, Esquire  
Attorney for Plaintiff



**McCABE, WEISBERG AND CONWAY, P.C.**

**BY:   TERRENCE J. McCABE, ESQUIRE - ID # 16496**  
**MARC S. WEISBERG, ESQUIRE - ID # 17616**  
**EDWARD D. CONWAY, ESQUIRE - ID # 34687**  
**MARGARET GAIRO, ESQUIRE - ID # 34419**  
**ANDREW L. MARKOWITZ, ESQUIRE - ID # 28009**  
**HEIDI R. SPIVAK, ESQUIRE - ID #74770**  
**MARISA J. COHEN, ESQUIRE - ID # 87830**  
**KEVIN T. MCQUAIL, ESQUIRE - ID # 307169**  
**CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480**  
**BRIAN T. LAMANNA, ESQUIRE - ID # 310321**

**Attorneys for Plaintiff**

**123 South Broad Street, Suite 2080**  
**Philadelphia, Pennsylvania 19109**  
**(215) 790-1010**

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank  
Plaintiff

v.

John R. Morgans  
Defendant

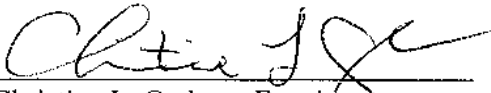
COLUMBIA COUNTY  
COURT OF COMMON PLEAS

No. 2001CV1291

**CERTIFICATION OF SERVICE**

The undersigned attorney for Plaintiff, hereby certifies that I served a true and correct copy of the foregoing Motion To Postpone Sheriff's Sale, by United States Mail, first class, postage prepaid, on the 4th day of May, 2012, upon the following:

John R. Morgans  
28 West 4th Street  
Bloomsburg, PA, 17815

  
Christine L. Graham, Esquire  
Attorney for Plaintiff

TERRENCE J. McCABE  
 MARC S. WEINBERG  
 EDWARD D. CONWAY  
 MARGARET GARGO  
 LISA L. WALLACE  
 DEBORAH K. CERRAN  
 LAURA H. O'SULLIVAN  
 GAYL C. SHAWK  
 JANET Z. CHARITON  
 ANDREW L. MARKOWITZ  
 HEDDIE R. SHIVAK  
 CATHERINE E. WELKER  
 SAMANTHA A. CLIFFORD  
 ROXANNE ARENA  
 DIANA C. TROJANOWICZ  
 ROANN T. LAMBERG-GO NIELL  
 MARISA J. COHEN  
 MARK GOLAB  
 MELISSA A. SPASATO  
 BRIAN T. LAMANN  
 BENJAMIN P. SMITH  
 ANTONETTE N. MOORE  
 ABBY K. MOYNHAN  
 JASON E. BROOKS  
 ERIN M. BRADY  
 CHRISTINE L. GRALIAM  
 CORIN DEMBENT  
 ALEXANDRA T. GARCIA  
 RICHARD J. SUZOR, JR.  
 KEVIN T. McQUAIL  
 LAURA L. LATTA  
 HEATHER M. WEINERT  
 MAKENNA E. PORCH  
 SHEELA G. BINGRINSKI  
 ANNE PRIGITZEL  
 JONATHAN BLUFANE  
 LUCAS M. ANDERSON  
 THEODORE J. MORALIS

See www.mccabeweisbergconway.com for a listing.

LAW OFFICES  
**McCABE, WEISBERG & CONWAY, P.C.**  
 SUITE 2080  
 123 SOUTH BROAD STREET  
 PHILADELPHIA, PA 19109  
 (215) 790-1010  
 FAX (215) 790-1274

March 6, 2012

SUITE 327  
 216 HADDON AVENUE  
 WESTMONT, NJ 08108  
 (955) 858-7080  
 FAX (955) 858-7020

SUITE 499  
 145 FROGNOT STREET  
 NEW ROCHELLE, NY 10801  
 (914) 936-8900  
 GENERAL FAX (914) 936-8901

SUITE 800  
 312 MARSHALL AVENUE  
 LAUREL, MD 20787  
 (301) 490-3361  
 FAX (301) 490-1589  
 Also serving the District of Columbia

SUITE 202  
 621 UNIVERSITY DRIVE  
 FAIRFAX, VA 22033  
 (866) 636-4179

SUITE 100  
 15 DIXTON FARMS ROAD  
 STAMFORD, CT 06305  
 (203) 992-8200

SUITE 130  
 101 LAWARE CORPORATE CENTER I  
 ONE EIGHTER PARKWAY  
 WILMINGTON, DELAWARE 19804  
 (302) 409-1520  
 FAX 855-425-1930

Timothy T. Chamberlain  
 Columbia County Courthouse  
 35 West Main Street  
 Bloomsburg, Pennsylvania 17815

Re: M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank  
 vs.  
 John R. Morgans  
 Columbia County, Court of Common Pleas, No. 2011CV1291  
 Premises: 28 West 4th Street, Bloomsburg, Pennsylvania 17815

Dear Sheriff:

As you know, the above-captioned matter is currently scheduled for the **March 7, 2012** Sheriff's Sale. I am requesting at this time that you postpone this matter to the **May 9, 2012** Sheriff's Sale.

As acknowledgment of this postponement, I would appreciate your signing or time-stamping a copy of this letter and faxing the same to my attention. Thank you for your cooperation.

Very truly yours,

**Panjola Alikaj**  
 Legal Assistant

/pa  
 SENT VIA FACSIMILE TRANSMITTAL--NUMBER 570-389-5625  
 SHERIFF'S OFFICE-RECEIVED BY:

\_\_\_\_\_  
 SIGNATURE

\_\_\_\_\_  
 DATE

**facsimile**  
**TRANSMITTAL**

---

**to:** Sheriff of Columbia County  
**fax #:** 570-389-5625  
**re:** M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First  
Savings Bank  
vs.  
John R. Morgans  
**date** February 7, 2012  
**pages:** 2

Please see the attached letter requesting that you postpone the Sheriff's Sale scheduled in the above-captioned matter.

From the desk of...

**KATHLEEN CULLUM**  
LEGAL ASSISTANT  
McCABE, WEISBERG & CONWAY, P.C.  
123 S. BROAD STREET, SUITE 2080  
PHILADELPHIA, PA 19109

215-790-1010  
Fax: 215-790-1274

TERRENCE J. McCABE  
 MARC S. WEISBERG  
 EDWARD D. CONWAY  
 MARGARET GABRO  
 LISA L. WALLACE  
 DEBORAH K. CURRAN  
 LAURA K.C. O'SULLIVAN  
 GAYL C. BRIVAK  
 JANET Z. CHARLTON  
 ANDREW L. MARKOWITZ  
 HEIDI R. BRIVAK  
 CATHIRINI G. WILKIE  
 SAMANTHA A. CLIFFORD  
 ROXANNE ARSNA  
 DIANA C. THEOLOGOU  
 JOANN T. LAMHUNT-O'NEILL  
 MARISA J. COHEN  
 MARK COLAB  
 MELISSA A. SPORATO  
 BRIAN T. LAMANN  
 BENJAMIN P. SMITH  
 ANTOINETTE N. MOORE  
 AMY K. MOYNIHAN  
 JASON E. BROOKS  
 ERIN M. BRADY  
 CHRISTINU L. GRAMIAN  
 COLLIN DEBENT  
 ALEXANDRA T. GARCIA  
 RICHARD J. SUZOR, JR.  
 KEVIN T. McQUATE  
 LAURA L. LATTA  
 HEATHER M. WEINERT  
 MAKENNA E. PORCH  
 SHIRAZA Q. MORGENSEN  
 ANNE REICHEL  
 JONATHAN ELEFANT  
 LUCAS M. ANDERSON  
 THEODORE J. MORRIS

See www.mccabeweisberg.com for listing.

LAW OFFICES  
**McCABE, WEISBERG & CONWAY, P.C.**  
 SUITE 2080  
 123 SOUTH BROAD STREET  
 PHILADELPHIA, PA 19109  
 (215) 790-1010  
 FAX (215) 790-1274

February 7, 2012

SUITE 303  
 216 HAINES AVENUE  
 WESTMONT, NJ 08108  
 (953) 888-7000  
 FAX (953) 888-7000

SUITE 400  
 143 HUGENOT STREET  
 NEW ROCHELLE, NY 10802  
 (914) 436-8900  
 GENERAL FAX (914) 436-8911

SUITE 100  
 312 MARSHALL AVENUE  
 LAUREL, MD 20707  
 (301) 496-3341  
 FAX (301) 496-1561  
 Also servicing the District of Columbia

SUITE 102  
 4021 UNIVERSITY DRIVE  
 FAIRFAX, VA 22030  
 (800) 656-0374

SUITE 100  
 14 BUXTON FARMS ROAD  
 STAMFORD, CT 06903  
 (203) 352-8200

SUITE 150  
 DELAWARE CORPORATE CENTER I  
 ONE MCINTOSH PARKWAY  
 WILMINGTON, DELAWARE 19801  
 (302) 406-0820  
 FAX 302-423-1980

Timothy T. Chamberlain  
 Columbia County Courthouse  
 35 West Main Street  
 Bloomsburg, Pennsylvania 17815

Re: M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank  
 vs.  
 John R. Morgans  
 Columbia County, Court of Common Pleas, No. 2011CV1291  
 Premises: 28 West 4th Street, Bloomsburg, Pennsylvania 17815

Dear Sheriff:

As you know, the above-captioned matter is currently scheduled for the February 8, 2012 Sheriff's Sale. I am requesting at this time that you postpone this matter to the March 7, 2012 Sheriff's Sale.

As acknowledgment of this postponement, I would appreciate your signing or time-stamping a copy of this letter and faxing the same to my attention. Thank you for your cooperation.

Very truly yours,

**Kathleen Cullum**  
 Legal Assistant

/kc

SENT VIA FACSIMILE TRANSMITTAL--NUMBER 570-389-5625  
 SHERIFF'S OFFICE-RECEIVED BY:

SIGNATURE

DATE

# SHERIFF'S SALE COST SHEET

VS.  
NO. \_\_\_\_\_ ED NO. \_\_\_\_\_ JD DATE/TIME OF SALE \_\_\_\_\_

✓ DOCKET/RETURN	\$15.00	
✓ SERVICE PER DEF.	\$ <u>740.00</u>	
✓ LEVY (PER PARCEL	\$15.00	
✓ MAILING COSTS	\$ <u>66.00</u>	
✓ ADVERTISING SALE BILLS & COPIES	\$17.50	
✓ ADVERTISING SALE (NEWSPAPER)	\$15.00	
✓ MILEAGE	\$ <u>6.00</u>	
✓ POSTING HANDBILL	\$15.00	
✓ CRYING/ADJOURN SALE	\$10.00	
✓ SHERIFF'S DEED	\$35.00	
✓ TRANSFER TAX FORM	\$25.00	
✓ DISTRIBUTION FORM	\$25.00	
✓ COPIES	\$ <u>8.00</u>	
✓ NOTARY	\$ <u>10.00</u>	
TOTAL *****		\$ <u>502.50</u>

✓ WEB POSTING	\$150.00	
✓ PRESS ENTERPRISE INC.	\$ <u>1364.82</u>	
✓ SOLICITOR'S SERVICES	\$75.00	
TOTAL *****		\$ <u>1589.82</u>

✓ PROTHONOTARY (NOTARY)	\$10.00	
RECORDER OF DEEDS	\$ <u>56.00</u>	
TOTAL *****		\$ <u>66.00</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>0.00</u>

✓ SURCHARGE FEE (DSTE)	\$ <u>170.00</u>	
MISC. _____	\$ _____	
_____	\$ _____	
TOTAL *****		\$ <u>0.00</u>

TOTAL COSTS (OPENING BID) \$ 2333.32

TERRENCE J. McCABE  
MARC S. WEISBERG  
EDWARD D. CONWAY  
MARGARET GAIKO  
LISA L. WALLACE  
DEBORAH K. CURRAN  
LAURA H.G. O'SULLIVAN  
GAYL C. SPIVAK  
JANET Z. CHARLTON  
ANDREW L. MARKOWITZ  
JEREMY R. SPIVAK  
CATHERINE E. WEIKER  
SAMANTHA A. CLIFFORD  
ROXANNE ARENA  
DIANA C. DIFIOLOGGIO  
JOANNETTE LAMBERT-O'NEILL  
MARISA J. COHEN  
MARK GOLAB  
MELISSA A. SPASATO  
BRIAN T. LAMANN  
BENJAMIN P. SMITH  
ANTOINETTE N. MOORE  
ABBY K. MOYNIHAN  
JASON E. BROOKS  
ERIN M. BRADY  
CHRISTINE L. GRAHAM  
CORRIN DEMENT  
ALEXANDRA T. GARCIA  
RICHARD J. SUZOR, JR.  
KEVIN T. McQUAIL  
LAURA L. LATTI  
JEREMY M. WEINERT  
MAKENNA E. PORCH  
STEPHAN G. ENGROSSE  
ANNE PEIGHTEL  
IONATJAN BLEFANT  
LUCAS M. ANDERSON  
THEODORE J. MORALLE

LAW OFFICES  
**McCABE, WEISBERG & CONWAY, P.C.**  
SUITE 2080  
123 SOUTH BROAD STREET  
PHILADELPHIA, PA 19109  
(215) 790-1010  
FAX (215) 790-1274

January 3, 2012

SUITE 305  
216 HADDON AVENUE  
WESTMONT, NJ 08108  
(856) 858-7080  
FAX (856) 858-7020  
  
SUITE 199  
245 HUGENOT STREET  
NEW ROCHELLE, NY 10801  
(914) 636-8900  
GENERAL FAX (914) 636-8901

SUITE 800  
312 MARSHALL AVENUE  
LAUREL, MD 20657  
(301) 490-1161  
FAX (301) 490-1568  
Also serving the District of Columbia

SUITE 202  
4021 UNIVERSITY DRIVE  
FAIRFAX, VA 22030  
(866) 636-0379

SUITE 100  
50 BOSTON FARMS ROAD  
STAMFORD, CT 06905  
(203) 952-6200

SUITE 120  
DELAWARE CORPORATE CENTER I  
ONE RCHTER PARKWAY  
WILMINGTON, DE LAWARE 19801  
(302) 409-1520  
FAX 302-425-1980

See letter from show attorney by e-mail

Prothonotary's Office  
Columbia County Courthouse  
35 West Main Street  
Bloomsburg, Pennsylvania 17815

Re: M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank vs. John R. Morgans  
Columbia County, No. 2011CV1291  
Premises: 28 West 4th Street, Bloomsburg, Pennsylvania 17815

Dear Sir or Madam:

Kindly file the enclosed Affidavit of Service of Amended Affidavit Pursuant to Rule 3129 regarding the above matter. Please file the original of record and return the time-stamped copies to me in the stamped self-addressed envelope provided. The property is currently scheduled for Sheriff Sale on February 8, 2012.

Please advise promptly if there are any problems in this regard. Thank you for your assistance in this matter.

Sincerely,

Megan Paolucci, Legal Assistant  
McCabe, Weisberg and Conway, P.C.

/mcp  
cc: Office of the Sheriff/Real Estate Division

**McCABE, WEISBERG & CONWAY, P.C.**  
TERRENCE J. McCABE, ESQUIRE - ID # 16496  
MARC S. WEISBERG, ESQUIRE - ID # 17616  
EDWARD D. CONWAY, ESQUIRE - ID # 34687  
MARGARET GAIRO, ESQUIRE - ID # 34419  
MARISA J. COHEN, ESQUIRE - ID # 87830  
KEVIN T. McQUAIL, ESQUIRE - ID # 307169  
CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480  
123 South Broad Street, Suite 2080  
Philadelphia, Pennsylvania 19109  
(215) 790-1010

Attorney for Plaintiff

M&T Bank f/k/a Manufacturers and Traders  
Trust Company s/b/m/t Franklin First Savings  
Bank

Plaintiff

v.

John R. Morgans  
Defendant

COLUMBIA COUNTY  
COURT OF COMMON PLEAS

Number 2011CV1291

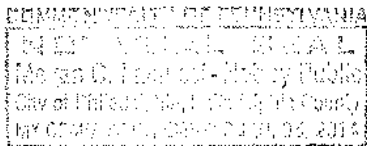
**AFFIDAVIT OF SERVICE**  
**OF**  
**AMENDED AFFIDAVIT PURSUANT TO RULE 3129**

The undersigned attorney for the Plaintiff in the within matter, hereby certifies that on the 3rd day of January, 2012, a true and correct copy of the Notice of Sheriff's Sale of Real Property was served on all pertinent lienholder(s) as set forth in Amended Affidavit Pursuant to 3129 which is attached hereto.

A copy of the Notice of Sheriff's Sale and certificate of mailing is also attached hereto and made a part hereof.

SWORN AND SUBSCRIBED  
BEFORE ME THIS 4th DAY  
OF January, 2012

Megan C. Fortucci  
NOTARY PUBLIC



**McCABE, WEISBERG & CONWAY, P.C.**  
Attorneys for Plaintiff

By: 

TERRENCE J. McCABE, ESQUIRE - ID # 16496  
MARC S. WEISBERG, ESQUIRE - ID # 17616  
EDWARD D. CONWAY, ESQUIRE - ID # 34687  
MARGARET GAIRO, ESQUIRE - ID # 34419  
MARISA J. COHEN, ESQUIRE - ID # 87830  
KEVIN T. McQUAIL, ESQUIRE - ID # 307169  
CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480

**McCABE, WEISBERG & CONWAY, P.C.**

**TERRENCE J. McCABE, ESQUIRE - ID # 16496**

**MARC S. WEISBERG, ESQUIRE - ID # 17616**

**EDWARD D. CONWAY, ESQUIRE - ID # 34687**

**MARGARET GAIRO, ESQUIRE - ID # 34419**

**MARISA J. COHEN, ESQUIRE - ID # 87830**

**KEVIN T. McQUAIL, ESQUIRE - ID # 307169**

**CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480**

**123 South Broad Street, Suite 2080**

**Philadelphia, Pennsylvania 19109**

**(215) 790-1010**

**Attorney for Plaintiff**

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank  
Plaintiff

v.

John R. Morgans

Defendant

COLUMBIA COUNTY  
COURT OF COMMON PLEAS

NO: 2011CV1291

**AMENDED AFFIDAVIT PURSUANT TO RULE 3129**

The undersigned attorney for Plaintiff in the above action sets forth the following information concerning the real property located at 28 West 4th Street, Bloomsburg, Pennsylvania 17815, as of the date the Praecipe for the Writ of Execution was filed. A copy of the description of said property is attached hereto.

1. Name and address of Owner or Reputed Owner

Name

Address

John R. Morgans

28 West 4th Street  
Bloomsburg, Pennsylvania 17815

2. Name and address of Defendant in the judgment:

Name

Address

John R. Morgans

28 West 4th Street  
Bloomsburg, Pennsylvania 17815

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

Name

Address

Plaintiff herein

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

Name

Address

Plaintiff herein



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

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

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

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

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

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

Tenants/Occupants	28 West 4th Street Bloomsburg, Pennsylvania 17815
-------------------	--

Commonwealth of Pennsylvania	Department of Public Welfare Bureau of Child Support Enforcement P.O. Box 2675 Harrisburg, PA 17105 ATTN: Dan Richard
------------------------------	---

Commonwealth of Pennsylvania Inheritance Tax Office	110 North 8 <sup>th</sup> Street Suite #204 Philadelphia, PA 19107
--	--

Commonwealth of Pennsylvania Bureau of Individual Tax Inheritance Tax Division	6th Floor, Strawberry Square Department #280601 Harrisburg, PA 17128
--	--

Department of Public Welfare TPL Casualty Unit Estate Recovery Program	Willow Oak Building P.O. Box 8486 Harrisburg, PA 17105-8486
--	---

PA Department of Revenue	Bureau of Compliance P.O. Box 281230 Harrisburg, PA 17128-1230
--------------------------	--

Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance	Clearance Support Department 281230 Harrisburg, PA 17128-1230 ATTN: Sheriff's Sales
---	---

United States of America	Internal Revenue Service Technical Support Group William Green Federal Building Room 3259 600 Arch Street Philadelphia, PA 19106
--------------------------	---

Domestic Relations of Columbia County	700 Sawmill Road Bloomsburg, PA 17815
--	--

United States of America

c/o United States Attorney for the  
Middle District of PA  
William J. Nealon Federal Bldg.  
235 North Washington Avenue, Ste. 311  
Scranton, PA 18503  
and  
Harrisburg Federal Building & Courthouse  
228 Walnut Street, Ste. 220  
Harrisburg, PA 17108-1754

United States of America c/o  
Atty General of the United States

U.S. Dept of Justice, Room 5111  
950 Pennsylvania Avenue NW  
Washington, DC 20530-0001

United States of America c/o  
Atty General of the United States

U.S. Dept of Justice, Room 4400  
950 Pennsylvania Avenue NW  
Washington, DC 20530-0001

8. Name and address of Attorney of record:

Name

Address

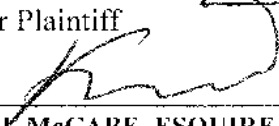
\_\_\_\_\_

\_\_\_\_\_

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.

January 3, 2012  
DATE

**McCABE, WEISBERG & CONWAY, P.C.**  
Attorneys for Plaintiff

By:   
TERRENCE J. McCABE, ESQUIRE  
MARC S. WEISBERG, ESQUIRE  
EDWARD D. CONWAY, ESQUIRE  
MARGARET GAIRO, ESQUIRE  
MARISA J. COHEN, ESQUIRE  
KEVIN T. McQUAIL, ESQUIRE  
CHRISTINE L. GRAHAM, ESQUIRE

McCABE, WEISBERG AND CONWAY, P.C.

BY: TERRENCE J. McCABE, ESQUIRE - ID # 16496  
MARC S. WEISBERG, ESQUIRE - ID # 17616  
EDWARD D. CONWAY, ESQUIRE - ID # 34687  
MARGARET GAIRO, ESQUIRE - ID # 34419  
ANDREW L. MARKOWITZ, ESQUIRE - ID # 28009  
HEIDI R. SPIVAK, ESQUIRE - ID # 74770  
MARISA J. COHEN, ESQUIRE - ID # 87830  
KEVIN T. McQUAIL, ESQUIRE - ID # 307169  
CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480  
BRIAN T. LaMANNA, ESQUIRE - ID # 310321

Attorneys for Plaintiff

123 South Broad Street, Suite 2080  
Philadelphia, Pennsylvania 19109  
(215) 790-1010

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank

Plaintiff

v.

John R. Morgans

Defendant

COURT OF COMMON PLEAS

COLUMBIA COUNTY

Number 2011CV1291

DATE: January 3, 2012

TO: ALL PARTIES IN INTEREST AND CLAIMANTS

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

OWNERS: John R. Morgans

PROPERTY: 28 West 4th Street, Bloomsburg, Pennsylvania 17815

IMPROVEMENTS: Residential Dwelling

The above-captioned property is scheduled to be sold at the Sheriff's Sale on **February 8, 2012 at 9:00 a.m.** in the Sheriff's Office of the Columbia County Courthouse, Main Street, Bloomsburg, Pennsylvania 17815. Our records indicate that you may hold a mortgage or judgments and liens on, and/or other interests in the property which will be extinguished by the sale. You may wish to attend the sale to protect your interests.

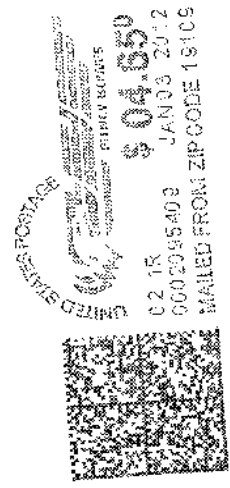
A schedule of distribution will be filed by the Sheriff on a date specified by the Sheriff not later than thirty (30) days after sale. Distribution will be made in accordance with the schedule unless exceptions are filed thereto within ten (10) days after the filing of the schedule.

Name and Address of Sender  
 McCabe, Weisberg and Conway, P.C.  
 123 S. Broad St., Suite 2080  
 Philadelphia, PA 19109  
 ATTN: M. Paolucci-58923

- Check type of mail or service:
- ☐ Certificate
  - ☐ COD
  - ☐ Delivery Confirmation
  - ☐ Express Mail
  - ☐ Insured
  - ☐ Registered
  - ☐ Return Receipt for Merchandise
  - ☐ Signature Confirmation
  - ☐ Restricted Delivery (International)

Affix Stamp Here  
 (if issued as a  
 certificate of mailing,  
 or for additional  
 postage)

Line	Article Number	Postage
1	M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank et al v.Morgans-58923	Tenants/Occupants 28 West 4th Street Bloomsburg, Pennsylvania 17815
2		Commonwealth of Pennsylvania Department of Public Welfare Bureau of Child Support Enforcement P.O. Box 2675 Harrisburg, PA 17105 ATTN: Dan Richard
3		Commonwealth of Pennsylvania Inheritance Tax Office 110 North 8th Street Suite #204 Philadelphia, PA 19107
4		Commonwealth of Pennsylvania Bureau of Individual Tax Inheritance Tax Division 6th Floor, Strawberry Square Department #280601 Harrisburg, PA 17128
5		Department of Public Welfare TPL Casualty Unit Estate Recovery Program Willow Oak Building P.O. Box 8486 Harrisburg, PA 17105-8486
6		PA Department of Revenue Bureau of Compliance P.O. Box 281230 Harrisburg, PA 17128-1230
7		Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance Clearance Support Department 281230 Harrisburg, PA 17128-1230 ATTN: Sheriff's Sales
8		United States of America Internal Revenue Service Technical Support Group William Green Federal Building Room 3259 600 Arch Street Philadelphia, PA 19106



[illegible]

# SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain  
Sheriff

James D. Arter  
Chief Deputy



M & T BANK  
vs.  
JOHN R MORGANS

Case Number  
2011CV1291

## SHERIFF'S RETURN OF SERVICE

11/01/2011 03:30 PM - DEPUTY EARL MORDAN, BEING DULY SWORN ACCORDING TO LAW, SERVED THE REQUESTED NOTICE OF SALE, WRIT OF EXECUTION AND DEBTOR'S RIGHTS BY "PERSONALLY" HANDING A TRUE COPY TO A PERSON REPRESENTING THEMSELVES TO BE SONJA RAE MORGANS-WIFE, WHO ACCEPTED AS "ADULT PERSON IN CHARGE" FOR JOHN R MORGANS AT 28 WEST 4TH STREET, BLOOMSBURG, PA 17815.

  
EARL MORDAN, DEPUTY

SO ANSWERS,

  
TIMOTHY T. CHAMBERLAIN, SHERIFF

November 02, 2011

## NOTARY

Affirmed and subscribed to before me this

2ND day of NOVEMBER, 2011

Plaintiff Attorney: MCCABE, WEISBERG & CONWAY PC, 123 S. BROAD STREET, SUITE 2080, PHILADELPHIA, PA

# SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain  
Sheriff



James D. Arter  
Chief Deputy

M & T BANK  
vs.  
JOHN R MORGANS

Case Number  
2011CV1291

## SERVICE COVER SHEET

### Service Details:

Category: Real Estate Sale - Posting - Sale Bill

Zone:

Manner: < Not Specified >

Expires: 11/28/2011

Warrant:

Notes: SHERIFF'S SALE BILL

### Serve To:

Name: (POSTING)

Primary Address: 28 WEST 4TH STREET  
BLOOMSBURG, PA 17815

Phone: DOB:

Alternate Address:

Phone:

### Final Service:

Served: Personally · Adult In Charge · Posted · Other

Adult In Charge:

Relation:

Date: 01/04/12

Time: 15:25

Deputy: # 7

Mileage:

### Attorney / Originator:

Name: MCCABE, WEISBERG & CONWAY PC

Phone: 215-790-1010

### Service Attempts:

Date:					
Time:					
Mileage:					
Deputy:					

### Service Attempt Notes:

1. paper was removed from door by John
2. Morgan
- 3.
- 4.
- 5.
- 6.

(POSTING)

2011CV1291

28 WEST 4TH STREET, BLOOMSBURG, PA 17815

EXP: 11/28/2011

COUNTY OF COLUMBIA  
TAX CLAIM BUREAU  
PO BOX 380  
BLOOMSBURG PA 17815

REAL ESTATE TAX CERTIFICATION

Date: 11/03/2011

Fee: \$5.00

Cert. NO: 11022

MORGANS JOHN R  
28 WEST 4TH STREET  
BLOOMSBURG PA 17815

District: TOWN OF BLOOMSBURG  
Deed: 0455 -0008  
Location: 28 W 4TH ST  
Parcel Id: 05W-03 -072-00,000

Assessment: 50,905  
Balances as of 11/03/2011

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

By: Columbia Co Sheriff

Per: Tim Chamberlain  
TSW



# SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain  
Sheriff



James D. Arter  
Chief Deputy

M & T BANK  
vs.  
JOHN R MORGANS

Case Number  
2011CV1291

## SERVICE COVER SHEET

### Service Details:

**Category:** Real Estate Sale - Sale Notice **Zone:**   
**Manner:** < Not Specified > **Expires:** 11/28/2011 **Warrant:**   
**Notes:** PLAINTIFF NOTICE OF SHERIFF'S SALE AND DEBTOR'S RIGHTS

### Serve To:

**Name:** Columbia County Tax Office  
**Primary Address:** PO Box 380  
 Bloomsburg, PA 17815  
**Phone:** 570-389-5649 **DOB:**   
**Alternate Address:**   
**Phone:**

### Final Service:

**Served:** Personally Adult In Charge Posted Other  
**Adult In Charge:** Sherry  
**Relation:** Clerk  
**Date:** 11/01/11 **Time:** 14:15  
**Deputy:** #7 **Mileage:**

### Attorney / Originator:

**Name:** MCCABE, WEISBERG & CONWAY PC **Phone:** 215-790-1010

### Service Attempts:

Date:	Time:	Mileage:	Deputy:

### Service Attempt Notes:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

COLUMBIA COUNTY TAX

2011CV1291

PO BOX 380, BLOOMSBURG, PA 17815

EXP: 11/28/2011

# SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain  
Sheriff



James D. Arter  
Chief Deputy

M & T BANK  
vs.  
JOHN R MORGANS

Case Number  
2011CV1291

## SERVICE COVER SHEET

### Service Details:

Category: Real Estate Sale - Sale Notice

Zone:

Manner: < Not Specified >

Expires: 11/28/2011

Warrant:

Notes: PLAINTIFF NOTICE OF SHERIFF'S SALE AND DEBTOR'S RIGHTS

### Serve To:

Name: JOHN R MORGANS

Primary Address: 28 WEST 4TH STREET  
BLOOMSBURG, PA 17815

Phone: DOB:

Alternate Address:

Phone:

### Final Service:

Served: Personally Adult In Charge Posted Other

Adult In Charge: Sonja Rae Morgans

Relation: wife

Date: 11/21/11 Time: 15:30

Deputy: # 7 Mileage:

### Attorney / Originator:

Name: MCCABE, WEISBERG & CONWAY PC

Phone: 215-790-1010

### Service Attempts:

Date:					
Time:					
Mileage:					
Deputy:					

### Service Attempt Notes:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

MORGANS, JOHN R

2011CV1291

28 WEST 4TH STREET, BLOOMSBURG, PA 17815

EXP: 11/28/2011

# SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain  
Sheriff



James D. Arter  
Chief Deputy

M & T BANK  
vs.  
JOHN R MORGANS

Case Number  
2011CV1291

## SERVICE COVER SHEET

### Service Details:

<b>Category:</b>	Real Estate Sale - Sale Notice	<b>Zone:</b>	
<b>Manner:</b>	< Not Specified >	<b>Expires:</b>	11/28/2011
<b>Notes:</b>	PLAINTIFF NOTICE OF SHERIFF'S SALE AND DEBTOR'S RIGHTS		

### Serve To:

<b>Name:</b>	Domestic Relations Office of Columbia
<b>Primary Address:</b>	15 Perry Avenue Bloomsburg, PA 17815
<b>Phone:</b>	<b>DOB:</b>
<b>Alternate Address:</b>	
<b>Phone:</b>	

### Final Service:

<b>Served:</b>	Personally - <u>Adult In Charge</u> - Posted - Other
<b>Adult In Charge:</b>	Margaret
<b>Relation:</b>	Customer Service Receptionist
<b>Date:</b>	11/01/11
<b>Time:</b>	16:00
<b>Deputy:</b>	# 7
<b>Mileage:</b>	

### Attorney / Originator:

<b>Name:</b> MCCABE, WEISBERG & CONWAY PC	<b>Phone:</b> 215-790-1010
---	----------------------------

### Service Attempts:

<b>Date:</b>						
<b>Time:</b>						
<b>Mileage:</b>						
<b>Deputy:</b>						

### Service Attempt Notes:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

DOMESTIC RELATIONS

2011CV1291

15 PERRY AVENUE, BLOOMSBURG, PA 17815

EXP: 11/28/2011

# SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain  
Sheriff



James D. Arter  
Chief Deputy

M & T BANK  
vs.  
JOHN R MORGANS

Case Number  
2011CV1291

## SERVICE COVER SHEET

### Service Details:

<b>Category:</b>	Real Estate Sale - Sale Notice	<b>Zone:</b>	
<b>Manner:</b>	< Not Specified >	<b>Expires:</b>	11/28/2011
<b>Notes:</b>	PLAINTIFF NOTICE OF SHERIFF'S SALE AND DEBTOR'S RIGHTS		

### Serve To:

<b>Name:</b>	BLOOMSBURG SEWER
<b>Primary Address:</b>	2ND STREET BLOOMSBURG, PA 17815
<b>Phone:</b>	<b>DOB:</b>
<b>Alternate Address:</b>	
<b>Phone:</b>	

### Final Service:

<b>Served:</b>	Personally <u>Adult In Charge</u> · Posted · Other
<b>Adult In Charge:</b>	Amber Kenney
<b>Relation:</b>	Clerk
<b>Date:</b>	11/01/11
<b>Time:</b>	15:45
<b>Deputy:</b>	#7
<b>Mileage:</b>	

### Attorney / Originator:

<b>Name:</b> MCCABE, WEISBERG & CONWAY PC	<b>Phone:</b> 215-790-1010
---	----------------------------

### Service Attempts:

<b>Date:</b>					
<b>Time:</b>					
<b>Mileage:</b>					
<b>Deputy:</b>					

### Service Attempt Notes:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

BLOOMSBURG SEWER

2011CV1291

2ND STREET, BLOOMSBURG, PA 17815

EXP: 11/28/2011

# SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain  
Sheriff



James D. Arter  
Chief Deputy

M & T BANK  
vs.  
JOHN R MORGANS

Case Number  
2011CV1291

## SERVICE COVER SHEET

### Service Details:

<b>Category:</b>	Real Estate Sale - Sale Notice	<b>Zone:</b>	
<b>Manner:</b>	< Not Specified >	<b>Expires:</b>	11/28/2011
<b>Notes:</b>	PLAINTIFF NOTICE OF SHERIFF'S SALE AND DEBTOR'S RIGHTS		

### Serve To:

<b>Name:</b>	Mary F. Ward		
<b>Primary Address:</b>	301 E Second Street, Town Hall Bloomsburg, PA 17816		
<b>Phone:</b>	570-784-1581	<b>DOB:</b>	
<b>Alternate Address:</b>			
<b>Phone:</b>			

### Final Service:

<b>Served:</b>	Personally · Adult In Charge · Posted · Other		
<b>Adult In Charge:</b>	Dropped in mail slot		
<b>Relation:</b>			
<b>Date:</b>	11/28/11	<b>Time:</b>	15:50
<b>Deputy:</b>	# 7	<b>Mileage:</b>	

### Attorney / Originator:

<b>Name:</b> MCCABE, WEISBERG & CONWAY PC	<b>Phone:</b> 215-790-1010
---	----------------------------

### Service Attempts:

<b>Date:</b>						
<b>Time:</b>						
<b>Mileage:</b>						
<b>Deputy:</b>						

### Service Attempt Notes:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_

WARD, MARY F.

2011CV1291

301 E SECOND STREET, TOWN HALL, BLOOMSBURG, EXP: 11/28/2011

Document Receipt

---

Trans # 41896 Carrier / service: POST 2PM 10/31/2011

Ship to: IRS

INTERNAL REVENUE SERVICE

WILLIAM GREEN FEDERAL BUILDING

600 ARCH STREET ROOM 3259

PHILADELPHIA PA 19106

Tracking #: 9171924291001000011392

Doc Ref #: 149ED2011

Document Receipt

---

Trans # 41895 Carrier / service: POST 2PM 10/31/2011

Ship to: COP

COMMONWEALTH OF PENNSYLVANIA DEPT OF REV SHERIFF SALE

Tracking #: 9171924291001000011385

DEPARTMENT 281230

Doc Ref #: 149ED2011

HARRISBURG PA 17128

Document Receipt

---

Trans # 41894 Carrier / service: POST 2PM 10/31/2011

Ship to: FAIR

OFFICE OF F.A.I.R.

DEPARTMENT OF PUBLIC WELFARE

PO BOX 8016

HARRISBURG PA 17105

Tracking #: 9171924291001000011378

Doc Ref #: 149ED2011



Document Receipt

---

Trans # 41893 Carrier / service: POST 2PM 10/31/2011

Ship to: SBA

U.S. Small Business Administration PHILADELPHIA DISTRICT  
OFFICE

PARKVIEW TOWERS  
1150 FIRST AVE, 10TH FLR, STE 1001

Tracking #: 9171924291001000011361

Doc Ref #: 149ED2011

KING OR PA 19406  
PRUSSIA

Document Receipt

---

Trans # 41892 Carrier / service: POST 2PM 10/31/2011

Ship to: 41892

UNITED STATES OF AMERICA

950 PENNSYLVANIA AVE NW

Tracking #: 9171924291001000011354

Doc Ref #: 149ED2011

WASHINGTON DC 20530

Document Receipt

---

Trans # 41891 Carrier / service: POST 2PM 10/31/2011

Ship to: 41891

UNITED STATES OF AMERICA

228 WALNUT STREET

Tracking #: 9171924291001000011347

Doc Ref #: 149ED2011

HARRISBURG PA 17108

Document Receipt

---

Trans # 41890 Carrier / service: POST 2PM 10/31/2011

Ship to: 41890

UNITED STATES OF AMERICA

ATTY FOR MIDDLE DISTRICT

235 NORTH WASHINGTON AVENUE

Tracking #: 9171924291001000011330

Doc Ref #: 149ED2011

SCRANTON PA 18503

Document Receipt

---

Trans # 41889 Carrier / service: POST 2PM 10/31/2011

Ship to: 41889

DEPT OF PUBLIC WELFARE

PO BOX 8486

Tracking #: 9171924291001000011323

Doc Ref #: 149ED2011

HARRISBURG PA 17105

Document Receipt

---

Trans # 41888 Carrier / service: POST 2PM 10/31/2011

Ship to: 41888

COMMONWEALTH OF PA

DEPT 280601

Tracking #: 9171924291001000011316

Doc Ref #: 149ED2011

HARRISBURG PA 17128

Document Receipt

---

Trans # 41887 Carrier / service: POST 2PM 10/31/2011

Ship to: 41887

COMMONWEALTH OF PA

110 NORTH 8TH STREET

Tracking #: 9171924291001000011309

Doc Ref #: 149ED2011

PHILADELPHIA PA 19107

Document Receipt

---

Trans # 41886 Carrier / service: POST 2PM 10/31/2011

Ship to: 41886

COMMONWEALTH OF PA

PO BOX 2675

Tracking #: 9171924291001000011293

Doc Ref #: 149ED2011

HARRISBURG PA 17105



# SHERIFF'S SALE

By Virtue of a Writ of Execution (Mortgage Foreclosure)  
No. 2011CV1291

Issued out of the Court of Common Pleas of Columbia County, Pennsylvania and to me directed, I will expose the following described property at public sale at the Columbia County Courthouse in the Town of Bloomsburg, County of Columbia, Commonwealth of Pennsylvania on:

**WEDNESDAY, FEBRUARY 08, 2012  
AT 9:00 O'CLOCK A.M.**

All parties in interest and claimants are further notified that a proposed schedule of distribution will be on file in the Sheriff's Office no later than thirty (30) days after the date of the sale of any property sold hereunder, and distribution of the proceeds will be made in accordance with the schedule ten (10) days after said filing, unless exceptions are filed with the Sheriff's Office prior thereto.

---

ALL THOSE TWO CERTAIN PIECES, PARCELS AND TRACTS OF LAND situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to-wit:

TRACT NO. 1: BEGINNING at the corner of Fourth Street and Whitman's Alley; THENCE along Fourth Street, North 64 degrees 40 minutes East, 50 feet; THENCE by land now or late of William H. Moore (formerly owned by Susan Kuhn) running Southwardly at right angles to Fourth Street, 84-1/4 feet to lot late of H. V. White, now or late of Harry S. Barton and Mabel P. Barton; THENCE by the same parallel with Fourth Street, 50 feet, more or less, to Whitman's Alley aforesaid and THENCE along the same 84-1/4 feet to the place of BEGINNING.

ON WHICH is erected a two story brick faced dwelling house.

TRACT NO. 2: BEGINNING at the northeast corner of lot now or late of George A. McKelvey (the said corner being 50 feet east of Whitman's Alley) AND RUNNING along said Fourth Street in an easterly direction 7 feet to a point on land late of William H. Brooks, now or late William H. Moore; THENCE in a southerly direction, 84-1/2 feet, more or less, to lot late of H. V. White, now or late of Harry S. and Mabel P. Barton; THENCE in a westerly direction along the said Barton lot, 7 feet, to lot now or late of George A. McKelvey, above described; THENCE in a northerly direction along said lot of George A. McKelvey, 84-1/2 feet to the place of BEGINNING.

The two parcels above described having a frontage on Fourth Street of 57 feet and a depth of 84-1/4 feet.

TOGETHER with all and singular the buildings, privileges, hereditaments and appurtenances whatsoever thereunto belonging or in anywise appertaining, and the reversions and remainders, rents, issues and profits thereof; and all the estate, rights, title and interest, property claim and demand whatsoever of the said grantors either in law or equity, of, in and to the same.

BEING KNOWN AS: 28 WEST 4TH STREET, BLOOMSBURG, PENNSYLVANIA 17815

TAX I.D. # N/A

THE IMPROVEMENTS THEREON ARE: RESIDENTIAL DWELLING

BEING THE SAME PREMISES WHICH BRUCE MARK ROMANIC AND JEANNE LOUISE ROMANIC, HIS WIFE by deed dated July 30, 1996 and recorded in the office of the Recorder in and for Columbia County in Deed Book 632, Page 0191, granted and conveyed to John R. Morgans.

REAL DEBT: \$59,040.99

SEIZED AND TAKEN IN EXECUTION AS THE PROPERTY OF:

JOHN R. MORGANS

McCabe, Wesiberg and Conway, P.C. 123 South Broad Street, Suite 2080 Philadelphia, P A 19109

PROPERTY ADDRESS: 28 WEST 4TH STREET, BLOOMSBURG, PA 17815

UPI / TAX PARCEL NUMBER: 05W-03-072

---

Seized and taken into execution to be sold as the property of JOHN R MORGANS in suit of M & T BANK.

---

**TERMS OF SALE: MINIMUM PAYMENT AT TIME OF SALE:** The greater of ten (10%) percent of the bid price or costs (opening bid at sale). Minimum payment is to be paid in cash, certified check or cashier's check at time of sale. **REMAINING BALANCE OF BID PRICE:** Any remaining amount of the bid price is to be paid within eight (8) days after the sale in cash, certified check or cashier's check. **IMPORTANT NOTICE FOR FAILURE TO PAY BID PRICE: FAILURE TO PAY THE BID PRICE IN ACCORDANCE WITH THESE TERMS MAY RESULT IN SERIOUS FINANCIAL CONSEQUENCES TO THE BIDDER. DO NOT BID UNLESS FUNDS ARE AVAILABLE FOR PAYMENT WITHIN THE PRESCRIBED TIME PERIOD.** If the successful bidder fails to pay the bid price as per the above terms, the Sheriff may elect to either sue the bidder for the balance due without a resale of the property, or to resell the property at the bidder's risk and maintain an action against the bidder for breach of contract. In the case of default all sums paid by the bidder will be considered forfeited, but will be applied against any damages recoverable. The defaulting bidder will be responsible for any attorney fees incurred by the sheriff in connection with any action against the bidder in which the bidder is found liable for damages. If proceeds are payable to the Plaintiff, the proceeds check will be payable to Plaintiff, unless the Columbia County Sheriff's Office receives advance written notice otherwise, signed by an authorized representation of the plaintiff.

**Attorney for the Plaintiff:**  
MCCABE, WEISBERG & CONWAY PC  
PHILADELPHIA, PA 215-790-1010

**TIMOTHY T. CHAMBERLAIN, Sheriff**  
COLUMBIA COUNTY, Pennsylvania

**PRAECIPE FOR WRIT OF EXECUTION (MORTGAGE FORECLOSURE)**  
**P.R.C.P. 3180 TO 3183**

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank  
1100 Wehrle Drive  
Williamsville, New York 14221

Plaintiff

v.

John R. Morgans  
28 West 4th Street  
Bloomsburg, Pennsylvania 17815

Defendant

**IN THE COURT OF COMMON PLEAS OF  
COLUMBIA COUNTY, PENNSYLVANIA**

No. \_\_\_\_\_ Term \_\_\_\_\_ E.D.

No. \_\_\_\_\_ Term, \_\_\_\_\_ A.D.

No. 2011CV1291 Term, \_\_\_\_\_ J.D.

*2011-ED-149*

**PRAECIPE FOR WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)**

**TO THE PROTHONOTARY:**

Amount Due	\$59,040.99
Interest from 09/24/11 to DATE OF SALE _____ plus \$9.71 per diem thereafter	\$ _____
(Costs to be added)	
Total	\$ _____

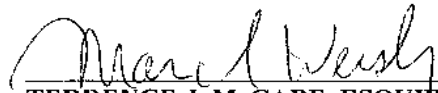
CLERK OF COURT'S OFFICE  
COLUMBIA COUNTY, PENNSYLVANIA

JUL 26 AM 11:49

FILED  
PROTHONOTARY

Dated: October 26, 2011

**McCabe, Weisberg and Conway, P.C.**



**TERRENCE J. McCABE, ESQUIRE  
MARC S. WEISBERG, ESQUIRE  
EDWARD D. CONWAY, ESQUIRE  
MARGARET GAIRO, ESQUIRE  
ANDREW L. MARKOWITZ, ESQUIRE  
HEIDI R. SPIVAK, ESQUIRE  
KEVIN T. McQUAIL, ESQUIRE  
CHRISTINE L. GRAHAM, ESQUIRE  
BRIAN T. LAMANNA, ESQUIRE  
Attorneys for Plaintiff**

NOTE: Please furnish description of Property

No. \_\_\_\_\_ Term \_\_\_\_\_ E.D.

No. \_\_\_\_\_ Term \_\_\_\_\_ A.D.

No. 2011CV1291 Term \_\_\_\_\_ J.D.

**IN THE COURT OF COMMON PLEAS OF  
COLUMBIA COUNTY PENNSYLVANIA**

M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin  
First Savings Bank

v.

John R. Morgans

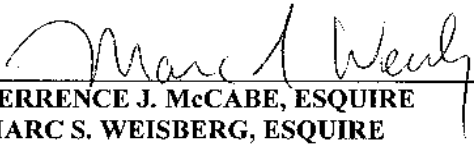
---

**PRAECIPE FOR WRIT OF EXECUTION  
(Mortgage foreclosure)**

Filed:

---

**McCabe, Weisberg and Conway, P.C.**

  
**TERRENCE J. McCABE, ESQUIRE  
MARC S. WEISBERG, ESQUIRE  
EDWARD D. CONWAY, ESQUIRE  
MARGARET GAIRO, ESQUIRE  
ANDREW L. MARKOWITZ, ESQUIRE  
HEIDI R. SPIVAK, ESQUIRE  
KEVIN T. McQUAIL, ESQUIRE  
CHRISTINE L. GRAHAM, ESQUIRE  
BRIAN T. LAMANNA, ESQUIRE  
Attorneys for Plaintiff**

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES, PARCELS AND TRACTS OF LAND situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to-wit:

TRACT NO. 1: BEGINNING at the corner of Fourth Street and Whitman's Alley; THENCE along Fourth Street, North 64 degrees 40 minutes East, 50 feet; THENCE by land now or late of William H. Moore (formerly owned by Susan Kuhn) running Southwardly at right angles to Fourth Street, 84-1/4 feet to lot late of H. V. White, now or late of Harry S. Barton and Mabel P. Barton; THENCE by the same parallel with Fourth Street, 50 feet, more or less, to Whitman's Alley aforesaid and THENCE along the same 84-1/4 feet to the place of BEGINNING.  
ON WHICH is erected a two story brick faced dwelling house.

TRACT NO. 2: BEGINNING at the northeast corner of lot now or late of George A. McKelvey (the said corner being 50 feet east of Whitman's Alley) AND RUNNING along said Fourth Street in an easterly direction 7 feet to a point on land late of William H. Brooks, now or late William H. Moore; THENCE in a southerly direction, 84-1/2 feet, more or less, to lot late of H. V. White, now or late of Harry S. and Mabel P. Barton; THENCE in a westerly direction along the said Barton lot, 7 feet, to lot now or late of George A. McKelvey, above described; THENCE in a northerly direction along said lot of George A. McKelvey, 84-1/2 feet to the place of BEGINNING.

The two parcels above described having a frontage on Fourth Street of 57 feet and a depth of 84-1/4 feet.

TOGETHER with all and singular the buildings, privileges, hereditaments and appurtenances whatsoever thereunto belonging or in anywise appertaining, and the reversions and remainders, rents, issues and profits thereof; and all the estate, rights, title and interest, property claim and demand whatsoever of the said grantors either in law or equity, of, in and to the same.

BEING KNOWN AS: 28 WEST 4TH STREET, BLOOMSBURG, PENNSYLVANIA 17815

TAX I.D. #: N/A

THE IMPROVEMENTS THEREON ARE: RESIDENTIAL DWELLING

BEING THE SAME PREMISES WHICH BRUCE MARK ROMANIC AND JEANNE LOUISE ROMANIC, HIS WIFE by deed dated July 30, 1996 and recorded in the office of the Recorder in and for Columbia County in Deed Book 632, Page 0191, granted and conveyed to John R. Morgans.

REAL DEBT: \$59,040.99

SEIZED AND TAKEN IN EXECUTION AS THE PROPERTY OF:  
JOHN R. MORGANS

McCabe, Wesiberg and Conway, P.C.  
123 South Broad Street, Suite 2080  
Philadelphia, PA 19109

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES, PARCELS AND TRACTS OF LAND situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to-wit:

TRACT NO. 1: BEGINNING at the corner of Fourth Street and Whitman's Alley; THENCE along Fourth Street, North 64 degrees 40 minutes East, 50 feet; THENCE by land now or late of William H. Moore (formerly owned by Susan Kuhn) running Southwardly at right angles to Fourth Street, 84-1/4 feet to lot late of H. V. White, now or late of Harry S. Barton and Mabel P. Barton; THENCE by the same parallel with Fourth Street, 50 feet, more or less, to Whitman's Alley aforesaid and THENCE along the same 84-1/4 feet to the place of BEGINNING.  
ON WHICH is erected a two story brick faced dwelling house.

TRACT NO. 2: BEGINNING at the northeast corner of lot now or late of George A. McKelvey (the said corner being 50 feet east of Whitman's Alley) AND RUNNING along said Fourth Street in an easterly direction 7 feet to a point on land late of William H. Brooks, now or late William H. Moore; THENCE in a southerly direction, 84-1/2 feet, more or less, to lot late of H. V. White, now or late of Harry S. and Mabel P. Barton; THENCE in a westerly direction along the said Barton lot, 7 feet, to lot now or late of George A. McKelvey, above described; THENCE in a northerly direction along said lot of George A. McKelvey, 84-1/2 feet to the place of BEGINNING.

The two parcels above described having a frontage on Fourth Street of 57 feet and a depth of 84-1/4 feet.

TOGETHER with all and singular the buildings, privileges, hereditaments and appurtenances whatsoever thereunto belonging or in anywise appertaining, and the reversions and remainders, rents, issues and profits thereof; and all the estate, rights, title and interest, property claim and demand whatsoever of the said grantors either in law or equity, of, in and to the same.

BEING KNOWN AS: 28 WEST 4TH STREET, BLOOMSBURG, PENNSYLVANIA 17815

TAX I.D. #: N/A

THE IMPROVEMENTS THEREON ARE: RESIDENTIAL DWELLING

BEING THE SAME PREMISES WHICH BRUCE MARK ROMANIC AND JEANNE LOUISE ROMANIC, HIS WIFE by deed dated July 30, 1996 and recorded in the office of the Recorder in and for Columbia County in Deed Book 632, Page 0191, granted and conveyed to John R. Morgans.

REAL DEBT: \$59,040.99

SEIZED AND TAKEN IN EXECUTION AS THE PROPERTY OF:  
JOHN R. MORGANS

McCabe, Wesiberg and Conway, P.C.  
123 South Broad Street, Suite 2080  
Philadelphia, PA 19109

LAW OFFICES

**McCABE, WEISBERG & CONWAY, P.C.**

SUITE 2080  
123 SOUTH BROAD STREET  
PHILADELPHIA, PA 19109  
(215) 790-1010  
FAX (215) 790-1274

SUITE 303  
216 HADDON AVENUE  
WESTMONT, NJ 08108  
(856) 858-7080  
FAX (856) 858-7020

SUITE 499  
145 HUGUENOT STREET  
NEW ROCHELLE, NY 10801  
(914)-636-8900  
GENERAL FAX (914) 636-8901  
MEDIATION ONLY FAX (914) 819-5505

SUITE 100  
8101 SANDY SPRING ROAD  
LAUREL, MD 20707  
(301) 490-3361  
FAX (301) 490-1568  
Also servicing the District of Columbia

SUITE 201  
4021 UNIVERSITY DRIVE  
FAIRFAX, VA 22030  
(866) 656-0379

SUITE 100  
30 BUXTON FARMS ROAD  
STAMFORD, CT 06905  
(203) 992-8200

October 26, 2011

TERRENCE J. McCABE \*\*\*  
MARC S. WEISBERG \*\*  
EDWARD D. CONWAY \*\*  
MARGARET GAIRO \*\*  
LISA L. WALLACE \*\*  
DEBORAH K. CURRAN \*\*  
LAURA H.G. O'SULLIVAN \*\*  
GAYL C. SPIVAK \*\*  
ANDREW L. MARKOWITZ \*\*  
HEIDI R. SPIVAK \*  
SCOTT T. TAGGART \*  
MARISA J. COHEN \*  
JASON BROOKS \*  
ERIN M. BRADY \*\*  
KEVIN T. McQUAIL \*  
ALEXANDRA T. GARCIA \*  
CORRIN DEMENT \*\*  
ABBY K. MOYNIHAN \*\*  
CATHERINE WELKER \*\*  
ANTOINETTE N. MOORE \*\*  
CHRISTINE GRAHAM \*  
MELISSA A. SPOSATO \*  
HEATHER WEINERT \*  
RICHARD J. SUZOR, JR. \*  
MAKENNA E. PORCH \*  
LAURA L. ATTA \*\*  
BRIAN T. LAMMANA \*  
DIANA THEOLOGOU \*\*  
SHEERA G. ENGRISSEI \*\*  
SAMANTHA A. CLIFFORD \* \*\*  
JO-ANN T. LAMBERT-O'NEILL \*  
ANNE PEIGHTEL \*  
MARK GOLAB †  
JONATHAN ELEFANT \*\*  
See www.mwc-law.com for licensing.

Office of the Prothonotary  
Columbia County Courthouse  
35 West Main Street  
Bloomsburg, Pennsylvania 17815

Re: M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank  
vs.  
John R. Morgans  
Columbia County, No. 2011CV1291  
Premises: 28 West 4th Street, Bloomsburg, Pennsylvania 17815

Dear Sir or Madam:

Enclosed please find the following documentation relative to the above-captioned matter:

1. Original and 3 copies of Praecipe for Writ of Execution;
2. Original and two copies of Affidavit Pursuant to Rule 3129;
3. Original and two copies of Affidavit of Defendants' Whereabouts;
4. Original and two copies of Affidavit of Non-Military Service;
5. Original and two copies of Instructions to the Sheriff, with a Waiver of Watchman;
6. Original and two copies of Notice of Sheriff's Sale of Real Property, as well as letter addressed to the Sheriff's Office;
7. The original and five copies of the legal description;
8. Check in the amount of \$25.00, which represents payment of the filing fee for the Writ of Execution;
9. Check in the amount of \$2,000.00 representing payment of the fee for listing the property for Sheriff's Sale.

Prothonotary of Columbia Court

M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank vs. John R. Morgans, et al

October 26, 2011

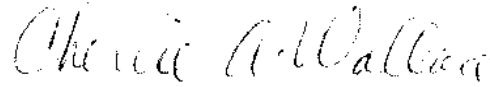
Page 2

---

Please file the pertinent documentation of record with the Court, return a time-stamped copy of the same to my attention in the enclosed stamped, self-addressed envelope, and forward all appropriate documentation to the Sheriff's Office so that this property may be listed for Sheriff's Sale.

Thank you for your cooperation in this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Cherice A. Wallace".

Cherice A. Wallace, Legal Assistant  
McCabe, Weisberg and Conway, P.C.

/cw

Enclosures



**McCABE, WEISBERG AND CONWAY, P.C.**

**BY:   TERRENCE J. McCABE, ESQUIRE - ID # 16496**  
**MARC S. WEISBERG, ESQUIRE - ID # 17616**  
**EDWARD D. CONWAY, ESQUIRE - ID # 34687**  
**MARGARET GAIRO, ESQUIRE - ID # 34419**  
**ANDREW L. MARKOWITZ, ESQUIRE - ID # 28009**  
**HEIDI R. SPIVAK, ESQUIRE - ID #74770**  
**MARISA J. COHEN, ESQUIRE - ID # 87830**  
**KEVIN T. McQUAIL, ESQUIRE - ID # 307169**  
**CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480**  
**BRIAN T. LaMANNA, ESQUIRE - ID # 310321**

**Attorneys for Plaintiff**

149

**123 South Broad Street, Suite 2080**  
**Philadelphia, Pennsylvania 19109**  
**(215) 790-1010**

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank

Plaintiff

v.

John R. Morgans

Defendant

COLUMBIA COUNTY  
COURT OF COMMON PLEAS

NO: 2011CV1291

**AFFIDAVIT PURSUANT TO RULE 3129**

The undersigned, attorney for Plaintiff in the above action, sets forth the following information concerning the real property located at: 28 West 4th Street, Bloomsburg, Pennsylvania 17815, as of the date the Praeipe for the Writ of Execution was filed. A copy of the description of said property being attached hereto.

1.       Name and address of Owner or Reputed Owner

Name

Address

/

John R. Morgans

28 West 4th Street  
Bloomsburg, Pennsylvania 17815

2.       Name and address of Defendant in the judgment:

Name

Address

John R. Morgans

28 West 4th Street  
Bloomsburg, Pennsylvania 17815

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

Name

Address

Plaintiff herein

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

Name

Address

Plaintiff herein

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

Name	Address
None	

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

Name	Address
None	

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

Name	Address
Tenants/Occupants	28 West 4th Street Bloomsburg, Pennsylvania 17815
2 Commonwealth of Pennsylvania	Department of Public Welfare Bureau of Child Support Enforcement P.O. Box 2675 Harrisburg, PA 17105 ATTN: Dan Richard
3 Commonwealth of Pennsylvania Inheritance Tax Office	110 North 8 <sup>th</sup> Street Suite #204 Philadelphia, PA 19107
4 Commonwealth of Pennsylvania Bureau of Individual Tax Inheritance Tax Division	6th Floor, Strawberry Square Department #280601 Harrisburg, PA 17128
5 Department of Public Welfare TPL Casualty Unit Estate Recovery Program	Willow Oak Building P.O. Box 8486 Harrisburg, PA 17105-8486
PA Department of Revenue	Bureau of Compliance P.O. Box 281230 Harrisburg, PA 17128-1230
Commonwealth of Pennsylvania Department of Revenue Bureau of Compliance	Clearance Support Department 281230 Harrisburg, PA 17128-1230 ATTN: Sheriff's Sales
United States of America	Internal Revenue Service Technical Support Group William Green Federal Building Room 3259 600 Arch Street Philadelphia, PA 19106
Domestic Relations of Columbia County	700 Sawmill Road Bloomsburg, PA 17815

6

United States of America

c/o United States Attorney for the  
Middle District of PA  
William J. Nealon Federal Bldg.  
235 North Washington Avenue, Ste. 311  
Scranton, PA 18503

7

and  
Harrisburg Federal Building & Courthouse  
228 Walnut Street, Ste. 220  
Harrisburg, PA 17108-1754

8

United States of America c/o  
Atty General of the United States

U.S. Dept of Justice, Room 5111  
950 Pennsylvania Avenue NW  
Washington, DC 20530-0001

United States of America c/o  
Atty General of the United States

U.S. Dept of Justice, Room 4400  
950 Pennsylvania Avenue NW  
Washington, DC 20530-0001

8. Name and address of Attorney of record:

Name

Address

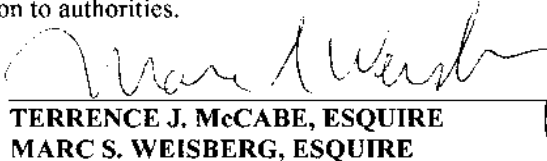
None

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.

October 26, 2011

DATE



**TERRENCE J. McCABE, ESQUIRE**  
**MARC S. WEISBERG, ESQUIRE**  
**EDWARD D. CONWAY, ESQUIRE**  
**MARGARET GAIRO, ESQUIRE**  
**ANDREW L. MARKOWITZ, ESQUIRE**  
**HEIDI R. SPIVAK, ESQUIRE**  
**KEVIN T. McQUAIL, ESQUIRE**  
**CHRISTINE L. GRAHAM, ESQUIRE**  
**BRIAN T. LAMANNA, ESQUIRE**  
**Attorneys for Plaintiff**

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES, PARCELS AND TRACTS OF LAND situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to-wit:

TRACT NO. 1: BEGINNING at the corner of Fourth Street and Whitman's Alley; THENCE along Fourth Street, North 64 degrees 40 minutes East, 50 feet; THENCE by land now or late of William H. Moore (formerly owned by Susan Kuhn) running Southwardly at right angles to Fourth Street, 84-1/4 feet to lot late of H. V. White, now or late of Harry S. Barton and Mabel P. Barton; THENCE by the same parallel with Fourth Street, 50 feet, more or less, to Whitman's Alley aforesaid and THENCE along the same 84-1/4 feet to the place of BEGINNING.

ON WHICH is erected a two story brick faced dwelling house.

TRACT NO. 2: BEGINNING at the northeast corner of lot now or late of George A. McKelvey (the said corner being 50 feet east of Whitman's Alley) AND RUNNING along said Fourth Street in an easterly direction 7 feet to a point on land late of William H. Brooks, now or late William H. Moore; THENCE in a southerly direction, 84-1/2 feet, more or less, to lot late of H. V. White, now or late of Harry S. and Mabel P. Barton; THENCE in a westerly direction along the said Barton lot, 7 feet, to lot now or late of George A. McKelvey, above described; THENCE in a northerly direction along said lot of George A. McKelvey, 84-1/2 feet to the place of BEGINNING.

The two parcels above described having a frontage on Fourth Street of 57 feet and a depth of 84-1/4 feet.

TOGETHER with all and singular the buildings, privileges, hereditaments and appurtenances whatsoever thereunto belonging or in anywise appertaining, and the reversions and remainders, rents, issues and profits thereof; and all the estate, rights, title and interest, property claim and demand whatsoever of the said grantors either in law or equity, of, in and to the same.

BEING KNOWN AS: 28 WEST 4TH STREET, BLOOMSBURG, PENNSYLVANIA 17815

TAX I.D. #: N/A

THE IMPROVEMENTS THEREON ARE: RESIDENTIAL DWELLING

BEING THE SAME PREMISES WHICH BRUCE MARK ROMANIC AND JEANNE LOUISE ROMANIC, HIS WIFE by deed dated July 30, 1996 and recorded in the office of the Recorder in and for Columbia County in Deed Book 632, Page 0191, granted and conveyed to John R. Morgans.

REAL DEBT: \$59,040.99

SEIZED AND TAKEN IN EXECUTION AS THE PROPERTY OF:  
JOHN R. MORGANS

McCabe, Wesiberg and Conway, P.C.  
123 South Broad Street, Suite 2080  
Philadelphia, PA 19109

McCABE, WEISBERG AND CONWAY, P.C.

BY: **TERRENCE J. McCABE, ESQUIRE - ID # 16496**  
**MARC S. WEISBERG, ESQUIRE - ID # 17616**  
**EDWARD D. CONWAY, ESQUIRE - ID # 34687**  
**MARGARET GAIRO, ESQUIRE - ID # 34419**  
**ANDREW L. MARKOWITZ, ESQUIRE - ID # 28009**  
**HEIDI R. SPIVAK, ESQUIRE - ID # 74770**  
**MARISA J. COHEN, ESQUIRE - ID # 87830**  
**KEVIN T. McQUAIL, ESQUIRE - ID # 307169**  
**CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480**  
**BRIAN T. LaMANNA, ESQUIRE - ID # 310321**

Attorneys for Plaintiff

123 South Broad Street, Suite 2080  
Philadelphia, Pennsylvania 19109  
(215) 790-1010

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank

Plaintiff

v.

John R. Morgans

Defendant

COLUMBIA COUNTY  
COURT OF COMMON PLEAS

Number 2011CV1291

**AFFIDAVIT OF NON-MILITARY SERVICE**

COMMONWEALTH OF PENNSYLVANIA:

SS.

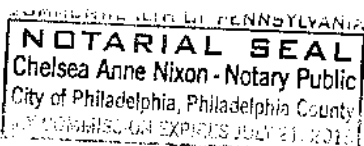
COUNTY OF PHILADELPHIA:

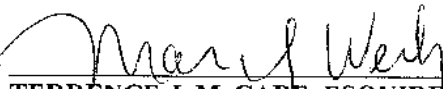
The undersigned, being duly sworn according to law, deposes and says that the Defendant, John R. Morgans, is not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Act of Congress of 1940 as amended; and that the Defendant, John R. Morgans, is over eighteen (18) years of age, and reside as follows:

John R. Morgans  
28 West 4th Street  
Bloomsburg, Pennsylvania 17815

SWORN AND SUBSCRIBED  
BEFORE ME THIS 26 DAY  
OF October, 2011

NOTARY PUBLIC



  
\_\_\_\_\_  
**TERRENCE J. McCABE, ESQUIRE**  
**MARC S. WEISBERG, ESQUIRE**  
**EDWARD D. CONWAY, ESQUIRE**  
**MARGARET GAIRO, ESQUIRE**  
**ANDREW L. MARKOWITZ, ESQUIRE**  
**HEIDI R. SPIVAK, ESQUIRE**  
**KEVIN T. McQUAIL, ESQUIRE**  
**CHRISTINE L. GRAHAM, ESQUIRE**  
**BRIAN T. LAMANNA, ESQUIRE**  
Attorneys for Plaintiff

**McCABE, WEISBERG AND CONWAY, P.C.**

**BY: TERRENCE J. McCABE, ESQUIRE - ID # 16496**  
**MARC S. WEISBERG, ESQUIRE - ID # 17616**  
**EDWARD D. CONWAY, ESQUIRE - ID # 34687**  
**MARGARET GAIRO, ESQUIRE - ID # 34419**  
**ANDREW L. MARKOWITZ, ESQUIRE - ID # 28009**  
**HEIDI R. SPIVAK, ESQUIRE - ID # 74770**  
**MARISA J. COHEN, ESQUIRE - ID # 87830**  
**KEVIN T. McQUAIL, ESQUIRE - ID # 307169**  
**CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480**  
**BRIAN T. LaMANNA, ESQUIRE - ID # 310321**

**Attorneys for Plaintiff**

**123 South Broad Street, Suite 2080**  
**Philadelphia, Pennsylvania 19109**  
**(215) 790-1010**

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank

Plaintiff

v.

John R. Morgans

Defendant

COURT OF COMMON PLEAS

COLUMBIA COUNTY

Number 2011CV1291

**AFFIDAVIT OF LAST-KNOWN MAILING ADDRESS OF DEFENDANT**

COMMONWEALTH OF PENNSYLVANIA:

SS.

COUNTY OF PHILADELPHIA:

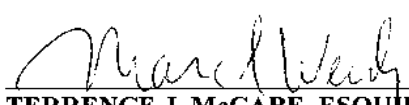
The undersigned, attorney for the Plaintiff in the within matter, being duly sworn according to law, hereby  
depose and say that the last-known mailing address of the Defendant is:

John R. Morgans  
28 West 4th Street  
Bloomsburg, Pennsylvania 17815

SWORN AND SUBSCRIBED  
BEFORE ME THIS 26 DAY  
OF October, 2011

  
NOTARY PUBLIC

COMMONWEALTH OF PENNSYLVANIA  
NOTARIAL SEAL  
Chelsea Anne Nixon - Notary Public  
City of Philadelphia, Philadelphia County  
MY COMMISSION EXPIRES 12/31/2015

  
**TERRENCE J. McCABE, ESQUIRE**  
**MARC S. WEISBERG, ESQUIRE**  
**EDWARD D. CONWAY, ESQUIRE**  
**MARGARET GAIRO, ESQUIRE**  
**ANDREW L. MARKOWITZ, ESQUIRE**  
**HEIDI R. SPIVAK, ESQUIRE**  
**KEVIN T. McQUAIL, ESQUIRE**  
**CHRISTINE L. GRAHAM, ESQUIRE**  
**BRIAN T. LAMANNA, ESQUIRE**  
**Attorneys for Plaintiff**

McCABE, WEISBERG AND CONWAY, P.C.

BY: **TERRENCE J. McCABE, ESQUIRE - ID # 16496**  
**MARC S. WEISBERG, ESQUIRE - ID # 17616**  
**EDWARD D. CONWAY, ESQUIRE - ID # 34687**  
**MARGARET GAIRO, ESQUIRE - ID # 34419**  
**ANDREW L. MARKOWITZ, ESQUIRE - ID # 28009**  
**HEIDI R. SPIVAK, ESQUIRE - ID # 74770**  
**MARISA J. COHEN, ESQUIRE - ID # 87830**  
**KEVIN T. McQUAIL, ESQUIRE - ID # 307169**  
**CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480**  
**BRIAN T. LaMANNA, ESQUIRE - ID # 310321**

Attorneys for Plaintiff

123 South Broad Street, Suite 2080  
Philadelphia, Pennsylvania 19109  
(215) 790-1010

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank

Plaintiff

v.

John R. Morgans

Defendant

COURT OF COMMON PLEAS

COLUMBIA COUNTY

Number 2011CV1291

TO: Sheriff of Columbia County  
Columbia County Courthouse  
35 West Main Street  
Bloomsburg, Pennsylvania 17815

SIR OR MADAM:

There will be placed in your hands for service a Writ (Order) of Execution in the above-captioned matter.

**INSTRUCTIONS**

You are hereby directed to post, levy upon, and sell the property described as follows:

**28 West 4th Street, Bloomsburg, Pennsylvania 17815**

(more fully described as attached)

The parties to be served and their proper addresses are as follows:

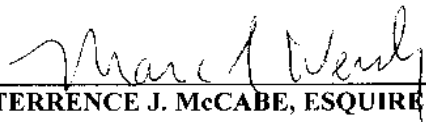
John R. Morgans  
28 West 4th Street  
Bloomsburg, Pennsylvania 17815

**WAIVER OF WATCHMAN**

Any deputy sheriff levying upon or attaching any property under within Writ may leave same without a watchman, in custody of whomever is found in possession, after notifying 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.

October 26, 2011

DATE

  
**TERRENCE J. McCABE, ESQUIRE**  
**MARC S. WEISBERG, ESQUIRE**  
**EDWARD D. CONWAY, ESQUIRE**  
**MARGARET GAIRO, ESQUIRE**  
**ANDREW L. MARKOWITZ, ESQUIRE**  
**HEIDI R. SPIVAK, ESQUIRE**  
**KEVIN T. McQUAIL, ESQUIRE**  
**CHRISTINE L. GRAHAM, ESQUIRE**  
**BRIAN T. LAMANNA, ESQUIRE**  
Attorneys for Plaintiff

TERRENCE J. McCABE \*\*\*  
MARC S. WEISBERG \*\*  
EDWARD D. CONWAY \*\*  
MARGARET GAIRO \*\*  
LISA L. WALLACE \*\*  
DEBORAH K. CURRAN \*\*  
LAURA H.G. O'SULLIVAN \*\*  
GAYL C. SPIVAK \*\*  
ANDREW L. MARKOWITZ \*\*  
HEIDI R. SPIVAK \*  
SCOTT T. TAGGART \*  
MARISA J. COHEN \*  
JASON BROOKS †  
ERIN M. BRADY \*\*  
KEVIN T. McQUAIL \*  
ALEXANDRA T. GARCIA \*  
CORRIN DEFMENT \*\*  
ABBY K. MOYNIHAN \*\*  
CATHERINE WELKER \*\*  
ANTOINETTE N. MOORE \*\*  
CHRISTINE GRAHAM \*  
MELISSA A. SPOSATO \*  
HEATHER WEINERT \*  
RICHARD J. SUZOR, JR. \*  
MAKENNA E. PORCH \*  
LAURA LATTA \*\*  
BRIAN T. LAMMANN \*  
DIANA THEOLOGOU \*\*  
SHEERA G. ENGRISSEI \*\*  
SAMANTHA A. CLIFFORD \* \*\*  
JO-ANN T. LAMBERT-O'NEILL \*  
ANNE PRIGITEL \*  
MARK GOLAB †  
JONATHAN ELEFANT \*\*  
See www.nmc-law.com for licensing.

LAW OFFICES  
**McCABE, WEISBERG & CONWAY, P.C.**

SUITE 2080  
123 SOUTH BROAD STREET  
PHILADELPHIA, PA 19109  
(215) 790-1010  
FAX (215) 790-1274

SUITE 303  
216 HADDON AVENUE  
WESTMONT, NJ 08108  
(856) 858-7080  
FAX (856) 858-7020

SUITE 499  
145 HUGUENOT STREET  
NEW ROCHELLE, NY 10801  
(914)-636-8900  
GENERAL FAX (914) 636-8901  
MEDIATION ONLY FAX (914) 819-5505

SUITE 100  
8101 SANDY SPRING ROAD  
LAUREL, MD 20707  
(301) 490-3361  
FAX (301) 490-1568  
Also servicing the District of Columbia

SUITE 201  
4021 UNIVERSITY DRIVE  
FAIRFAX, VA 22030  
(866) 656-0379

SUITE 100  
30 BUXTON FARMS ROAD  
STAMFORD, CT 06905  
(203) 992-8200

October 26, 2011

Sheriff's Office  
Columbia County Courthouse  
35 West Main Street  
Bloomsburg, Pennsylvania 17815

Re: M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank vs. John R. Morgans  
Columbia County, Number 2011CV1291  
Premises: 28 West 4th Street, Bloomsburg, Pennsylvania 17815

Dear Sir or Madam:

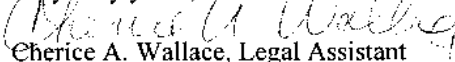
Enclosed please find 2 copies of Notice of Sheriff's Sale of Real Estate Pursuant to P.A.R.C.P. 3129 relative to the above matter. I would appreciate your serving the Notice upon the Defendant as follows:

John R. Morgans  
28 West 4th Street  
Bloomsburg, Pennsylvania 17815

Please be advised that our office will serve the above referenced defendants by regular and certified mail. Please post the 28 West 4th Street, Bloomsburg, Pennsylvania 17815.

Please deputize the Columbia County Sheriff to serve the above referenced defendant, serviceform. Our stamped self-addressed envelope and check for \$2,000 payable to the Sheriff of Columbia County are enclosed.

Very truly yours,

  
Cherice A. Wallace, Legal Assistant  
McCabe, Weisberg and Conway, P.C.

/

Enclosures



**McCABE, WEISBERG AND CONWAY, P.C.**

**BY:   TERRENCE J. McCABE, ESQUIRE - ID # 16496**  
**MARC S. WEISBERG, ESQUIRE - ID # 17616**  
**EDWARD D. CONWAY, ESQUIRE - ID # 34687**  
**MARGARET GAIRO, ESQUIRE - ID # 34419**  
**ANDREW L. MARKOWITZ, ESQUIRE - ID # 28009**  
**HEIDI R. SPIVAK, ESQUIRE - ID #74770**  
**MARISA J. COHEN, ESQUIRE - ID # 87830**  
**KEVIN T. McQUAIL, ESQUIRE - ID # 307169**  
**CHRISTINE L. GRAHAM, ESQUIRE - ID # 309480**  
**BRIAN T. LaMANNA, ESQUIRE - ID # 310321**

**Attorneys for Plaintiff**

**123 South Broad Street, Suite 2080**  
**Philadelphia, Pennsylvania 19109**  
**(215) 790-1010**

**CIVIL ACTION LAW**

M&T Bank f/k/a Manufacturers and Traders Trust  
Company s/b/m/t Franklin First Savings Bank

v.

John R. Morgans

COURT OF COMMON PLEAS

COLUMBIA COUNTY

Number 2011CV1291

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

To:     John R. Morgans  
       28 West 4th Street  
       Bloomsburg, Pennsylvania 17815

Your house (real estate) at **28 West 4th Street, Bloomsburg, Pennsylvania 17815** is scheduled to be sold at Sheriff's Sale on \_\_\_\_\_ at \_\_\_\_\_ a.m. in the Sheriff's Office of the Columbia County Courthouse, Main Street, Bloomsburg, Pennsylvania 17815 to enforce the court judgment of \$59,040.99 obtained by M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank 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 canceled if you pay to M&T Bank f/k/a Manufacturers and Traders Trust Company s/b/m/t Franklin First Savings Bank the back payments, late charges, costs, and reasonable attorney's fees due. To find out how much you must pay, you may call McCabe, Weisberg and Conway, P.C., Esquire at (215) 790-1010.
2.     You may be able to stop the sale by filing a petition asking the Court to strike or open the judgment, if the judgment was improperly entered. You may also ask the Court to postpone the sale for good cause.
3.     You may also be able to stop the sale through other legal proceedings.

You may need an attorney to assert your rights. The sooner you contact one, the more chance you will have of stopping the sale. (See the following notice on how to obtain an attorney.)

**YOU MAY STILL BE ABLE TO SAVE YOUR PROPERTY**  
**AND YOU HAVE OTHER RIGHTS**  
**EVEN IF THE SHERIFF'S SALE DOES TAKE PLACE**

1. If the Sheriff's Sale is not stopped, your property will be sold to the highest bidder. You may find out the price bid by calling McCabe, Weisberg and Conway, P.C., Esquire at (215) 790-1010.
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 on the sale. To find out if this has happened, you may call McCabe, Weisberg and Conway, P.C. at (215) 790-1010.
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 real estate. A schedule of distribution of the money bid for your real estate will be filed by the Sheriff within thirty (30) days of the sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed schedule of distribution is wrong) are filed with the Sheriff within ten (10) days after the posting of the schedule of distribution.
7. You may also have other rights and defenses, or ways of getting your real estate 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, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.**

**IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.**

**LAWYER REFERRAL SERVICE**  
**Columbia County Lawyer Referral Service**  
**North Penn Legal Services**  
**168 East 5th Street**  
**Bloomsburg, Pennsylvania 17815**  
**570-784-8760**

**ASSOCIATION DE LICENCIADOS**  
**Columbia County Lawyer Referral Service**  
**North Penn Legal Services**  
**168 East 5th Street**  
**Bloomsburg, Pennsylvania 17815**  
**570-784-8760**

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES, PARCELS AND TRACTS OF LAND situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to-wit:

TRACT NO. 1: BEGINNING at the corner of Fourth Street and Whitman's Alley; THENCE along Fourth Street, North 64 degrees 40 minutes East, 50 feet; THENCE by land now or late of William H. Moore (formerly owned by Susan Kuhn) running Southwardly at right angles to Fourth Street, 84-1/4 feet to lot late of H. V. White, now or late of Harry S. Barton and Mabel P. Barton; THENCE by the same parallel with Fourth Street, 50 feet, more or less, to Whitman's Alley aforesaid and THENCE along the same 84-1/4 feet to the place of BEGINNING.  
ON WHICH is erected a two story brick faced dwelling house.

TRACT NO. 2: BEGINNING at the northeast corner of lot now or late of George A. McKelvey (the said corner being 50 feet east of Whitman's Alley) AND RUNNING along said Fourth Street in an easterly direction 7 feet to a point on land late of William H. Brooks, now or late William H. Moore; THENCE in a southerly direction, 84-1/2 feet, more or less, to lot late of H. V. White, now or late of Harry S. and Mabel P. Barton; THENCE in a westerly direction along the said Barton lot, 7 feet, to lot now or late of George A. McKelvey, above described; THENCE in a northerly direction along said lot of George A. McKelvey, 84-1/2 feet to the place of BEGINNING.

The two parcels above described having a frontage on Fourth Street of 57 feet and a depth of 84-1/4 feet.

TOGETHER with all and singular the buildings, privileges, hereditaments and appurtenances whatsoever thereunto belonging or in anywise appertaining, and the reversions and remainders, rents, issues and profits thereof; and all the estate, rights, title and interest, property claim and demand whatsoever of the said grantors either in law or equity, of, in and to the same.

BEING KNOWN AS: 28 WEST 4TH STREET, BLOOMSBURG, PENNSYLVANIA 17815

TAX I.D. #: N/A

THE IMPROVEMENTS THEREON ARE: RESIDENTIAL DWELLING

BEING THE SAME PREMISES WHICH BRUCE MARK ROMANIC AND JEANNE LOUISE ROMANIC, HIS WIFE by deed dated July 30, 1996 and recorded in the office of the Recorder in and for Columbia County in Deed Book 632, Page 0191, granted and conveyed to John R. Morgans.

REAL DEBT: \$59,040.99

SEIZED AND TAKEN IN EXECUTION AS THE PROPERTY OF:  
JOHN R. MORGANS

McCabe, Wesiberg and Conway, P.C.  
123 South Broad Street, Suite 2080  
Philadelphia, PA 19109

## LEGAL DESCRIPTION

ALL THOSE TWO CERTAIN PIECES, PARCELS AND TRACTS OF LAND situate in the Town of Bloomsburg, Columbia County, Pennsylvania, bounded and described as follows, to-wit:

TRACT NO. 1: BEGINNING at the corner of Fourth Street and Whitman's Alley; THENCE along Fourth Street, North 64 degrees 40 minutes East, 50 feet; THENCE by land now or late of William H. Moore (formerly owned by Susan Kuhn) running Southwardly at right angles to Fourth Street, 84-1/4 feet to lot late of H. V. White, now or late of Harry S. Barton and Mabel P. Barton; THENCE by the same parallel with Fourth Street, 50 feet, more or less, to Whitman's Alley aforesaid and THENCE along the same 84-1/4 feet to the place of BEGINNING.  
ON WHICH is erected a two story brick faced dwelling house.

TRACT NO. 2: BEGINNING at the northeast corner of lot now or late of George A. McKelvey (the said corner being 50 feet east of Whitman's Alley) AND RUNNING along said Fourth Street in an easterly direction 7 feet to a point on land late of William H. Brooks, now or late William H. Moore; THENCE in a southerly direction, 84-1/2 feet, more or less, to lot late of H. V. White, now or late of Harry S. and Mabel P. Barton; THENCE in a westerly direction along the said Barton lot, 7 feet, to lot now or late of George A. McKelvey, above described; THENCE in a northerly direction along said lot of George A. McKelvey, 84-1/2 feet to the place of BEGINNING.

The two parcels above described having a frontage on Fourth Street of 57 feet and a depth of 84-1/4 feet.

TOGETHER with all and singular the buildings, privileges, hereditaments and appurtenances whatsoever thereunto belonging or in anywise appertaining, and the reversions and remainders, rents, issues and profits thereof; and all the estate, rights, title and interest, property claim and demand whatsoever of the said grantors either in law or equity, of, in and to the same.

BEING KNOWN AS: 28 WEST 4TH STREET, BLOOMSBURG, PENNSYLVANIA 17815

TAX I.D. #: N/A

THE IMPROVEMENTS THEREON ARE: RESIDENTIAL DWELLING

BEING THE SAME PREMISES WHICH BRUCE MARK ROMANIC AND JEANNE LOUISE ROMANIC, HIS WIFE by deed dated July 30, 1996 and recorded in the office of the Recorder in and for Columbia County in Deed Book 632, Page 0191, granted and conveyed to John R. Morgans.

REAL DEBT: \$59,040.99

SEIZED AND TAKEN IN EXECUTION AS THE PROPERTY OF:  
JOHN R. MORGANS

McCabe, Wesiberg and Conway, P.C.  
123 South Broad Street, Suite 2080  
Philadelphia, PA 19109

61197

**MCCABE, WEISBERG & CONWAY, P.C.**

ATTORNEYS AT LAW

123 S. BROAD STREET SUITE 2080  
PHILADELPHIA, PA 19109  
(215) 790-1010

NO.

3-50/310

PAY Two Thousand

DATE

Oct/27/2011

AMOUNT

\$2,000.00

00/100

ESCROW TRUST  
VOID AFTER 90 DAYS

TO THE Sheriff of Columbia County  
ORDER

OF

Listing Property for Sheriff Sale 287-0483 Morgans

*Thomas A. Weisberg*

061197 031000503 2000012430022