

SHERIFF'S SALE

By Virtue of a Writ of Execution (Mortgage Foreclosure)
No. 2012CV562

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, SEPTEMBER 05, 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 THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D.L.&W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

PROPERTY ADDRESS: 1109 STERLING AVENUE, BERWICK, PA 18603

UPI / TAX PARCEL NUMBER: 04C-03-013

Seized and taken into execution to be sold as the property of DAWN LONGENBERGER, VERNON E GROSS, SR in suit of SPRINGLEAF FINANCIAL SERVICES OF PENNSYLVANIA.

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:
FOX AND FOX ATTORNEYS AT LAW, P.C.
NORRISTOWN, PA 610-275-7990

TIMOTHY T. CHAMBERLAIN, Sheriff
COLUMBIA COUNTY, Pennsylvania

REAL ESTATE OUTLINE

ED # 9-1-12

DATE RECEIVED 7-5-12
DOCKET AND INDEX 7-10-12

CHECK FOR PROPER INFO.

WRIT OF EXECUTION	<u>✓</u>	
COPY OF DESCRIPTION	<u>✓</u>	
WHEREABOUTS OF LKA	<u>✓</u>	
NON-MILITARY AFFIDAVIT	<u>✓</u>	
NOTICES OF SHERIFF SALE	<u>✓</u>	
WAIVER OF WATCHMAN	<u>✓</u>	
AFFIDAVIT OF LIENS LIST	<u>✓</u>	
CHECK FOR \$1,350.00 OR _____	<u>✓</u>	CK# <u>3806</u>

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

SALE DATE	<u>Sept. 5, 12</u>	TIME <u>7:00</u>
POSTING DATE	<u>Aug. 1, 12</u>	
ADV. DATES FOR NEWSPAPER	1 ST WEEK <u>Aug. 18</u>	
	2 ND WEEK <u>22</u>	
	3 RD WEEK <u>29, 12</u>	

WRIT OF EXECUTION – (MORTGAGE FORECLOSURE)
P.R.C.P. 3180 to 3183 and Rule 3257

**SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603**

vs.

**VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603**

**: COURT OF COMMON PLEAS
: COLUMBIA COUNTY, PA
:
:
:
: No. 2012-CV-562
: 2012-ED-44
:
:
:
: WRIT OF EXECUTION
: (MORTGAGE FORECLOSURE)**

Commonwealth of Pennsylvania:
County of Columbia

TO THE SHERIFF OF FAYETTE COUNTY, PENNSYLVANIA

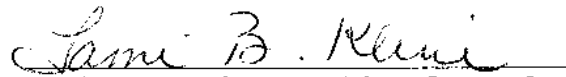
To satisfy the judgment, interest and costs in the above matter you are directed to levy upon and sell the following described property (specifically described below):

1109 Sterling Avenue
Berwick, PA 18603

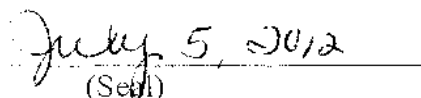
Amount Due: \$ 56,370.09
Interest from: 3/7/2012 \$ 14.11 per day

Total: \$ _____ Plus costs

As endorsed:


Prothonotary, Common Pleas Court of
Columbia County, Pennsylvania

Date: _____


(Seal)

Prothon & Clerk of Sec. Courts
My Com. Ex. 1st Monday in 2016

Clerk

NO. 2012-CV-562 2012-ED-94

IN THE COURT OF COMMON PLEAS OF
COLUMBIA COUNTY, PENNSYLVANIA

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.

vs.

VERNON E. GROSS and
DAWN LONGENBERGER

WRIT OF EXECUTION
(Mortgage Foreclosure)

COSTS:

Prothonotary: Complaint	\$	<u>115.00</u>
Judgment Fee:	\$	<u>15.00</u>
Writ	\$	<u>25.00</u>
Satisfaction:	\$	<u>10.00</u>

Benjamin E. Witmer, Esquire
FOX AND FOX ATTORNEYS AT LAW, P.C.
425 Swede Street
Suite 706 – One Montgomery Plaza
Norristown, PA 19401
Attorney ID # 89100

1112 W. Front Street
Berwick, PA 18603

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

Name	Address (if address cannot be reasonably ascertained, please so indicate)
VERNON E. GROSS	1112 W. Front Street Berwick, PA 18603
DAWN LONGENBERGER	1112 W. Front Street Berwick, PA 18603

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

a) Columbia County Tax Claim Bureau	a) 35 W. Main Street Bloomsburg, PA 17815
b) Domestic Relations of Columbia County	b) 35 W. Main Street Bloomsburg, PA 17815
c) Borough of Berwick 570-752-2723	c) 1800 N. Market Street Berwick, PA 18603
d) Berwick Area School District (570)759-6400	d) 500 Line Road Berwick, PA 18603
e) PA Dept. of Public Welfare	e) Bureau of Child Support Enforcement P.O. Box 8018 Harrisburg, PA 17105-8018
f) PA Dept. of Revenue	f) The Bureau of Compliance Attn: Sheriff Sale Section P.O. Box 218230 Harrisburg, PA 17128-1230

- | | | | |
|----|---|----|--|
| g) | Commonwealth of PA | g) | Bureau of Individual Tax
Inheritance Tax Division
6th fl., Strawberry Square
Dept. #280601
Harrisburg, A 17128 |
| h) | Inheritance Tax Division | h) | PA Department of Revenue
Bureau of Individual Taxes
Dept. 280601
Harrisburg, PA 17128-0601 |
| i) | Internal Revenue Service | i) | Federal Estate Tax
Chief Examination Division
Group 1820
P.O. Box 331
Bensalem, PA 19020 |
| j) | USA/Internal Revenue Serv. | j) | Federal Estate Tax
Special Procedures Branch
1000 Liberty Avenue, Rm. 112
Pittsburgh, PA 15222-4003 |
| k) | Commonwealth of Penn. | k) | Dept. of Public Welfare
TPL Casualty Unit
Estate Recovery Program
P.O. Box 8486
Willow Oak Building
Harrisburg, PA 17105-8486 |
| l) | Commonwealth of PA | l) | Inheritance Tax Office
1400 Spring Garden Street
Philadelphia, PA 19130 |
| n) | Register of Wills
of Columbia County | n) | 35 West Main Street
Bloomsburg, PA 17815 |
| o) | Berwick Area Joint Sewer
Authority | o) | 1800 N. Market Street
Berwick, PA 18603 |

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

Name

Address (if address cannot be reasonably
ascertained, please so indicate)

- | | | | |
|----|--|----|--|
| a) | Springleaf Financial
Services of Pennsylvania,
Inc., fka American General
Consumer Discount Company | a) | 132 W. Front Street
Berwick, PA 18603 |
|----|--|----|--|

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

Only those listed in 3 and 4 above.

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

Name	Address (if address cannot be reasonably ascertained, please so indicate)
------	--

Only those listed in 3 and 4 above.

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

Name	Address (if address cannot be reasonably ascertained, please so indicate)
------	--

Only those listed in 3 and 4 above.

I verify that I am the attorney for the plaintiff, Springleaf Financial Services of
Pennsylvania, Inc., fka American General Consumer Discount Company, in this action; that I am
authorized to take this Verification on their behalf; and that the statements made in this
Verification are true and correct to the best of my personal knowledge, information and belief. I
understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section

4909 relating to unsworn falsification to authorities.

Date: 7/3/12

A handwritten signature in black ink, appearing to read 'B. Witmer', written over a horizontal line.

Benjamin E. Witmer
Attorney for Plaintiff

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

NOTICE OF OWNER'S RIGHTS

YOU MAY BE ABLE TO PREVENT THIS SHERIFF'S SALE

1. This sale will be canceled if you pay the judgment to Benjamin E. Witmer, Esquire, 706 One Montgomery Plaza, Norristown, PA 19401. To find out how much you must pay, you may call (610) 275-7990.

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.

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 the Sheriff's Office at (570) 389-5622 or Benjamin E. Witmer, Esquire, at (610) 275-7990.

2. You may be able to petition the court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.

3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened you may call the Sheriff's Office at (570) 389-5622 or Benjamin E. Witmer, Esquire at (610) 275-7990.

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(s) until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.

6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money bid for your house will be filed by the Sheriff on the 30th day after the sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days of the preparation of the schedule of distribution.

7. You may also have other rights and defenses, or ways of getting your house back, if you act immediately after the sale.

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

**Northpenn Legal Services
(for Columbia County)
168 E. 5th Street
Bloomsburg, PA 17815
(570) 784-8760**

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

- (1) Fill out the attached claim form and demand for a promptly hearing.
- (2) Deliver the form or mail it to the Sheriff's Office at the address notice. You should come to court ready to explain your exemption. If you do not come to court and prove your exemptions, you may lose some of your property.

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

**Northpenn Legal Services
(for Columbia County)
168 E. 5th Street
Bloomsburg, PA 17815
(570) 784-8760**

MAJOR EXEMPTIONS UNDER PENNSYLVANIA AND FEDERAL LAW

1. \$300 statutory exemption
2. Bibles, school books, sewing machines uniforms and equipment.
3. most wages and unemployment compensation
4. Social Security Benefits
5. Certain retirement fund and accounts
6. Certain veteran and armed forces benefits
7. Certain insurance proceeds
8. Such other exemptions as may be provided by law

CLAIM FOR EXEMPTION

TO THE SHERIFF:

We, the above-named defendants, claim exemption of property from levy or attachment:

(1) From my personal property in my possession which has been levied upon,

(a) I desire that my \$300 Statutory exemption be
[] (I) set aside in kind (specify property to be set aside in kind):

[] (II) paid in cash following the sale of the
property levied upon; or

(b) I claim the following exemption (specify property and basis of exemption):

(2) From my property which is in the possession of a third party, I claim the following exemptions:

(a) my \$300 statutory exemption [] in cash; [] in kind (specify property):
_____;

(b) Social Security benefits on deposit in the amount of: \$_____;

(c) other (specify amount and basis of exemption):

I request a prompt court hearing to determine the exemption. Notice of the hearing should be given to me at

(Address)

(Telephone Number)

We verify that the statements made in this Claim for Exemption are true and correct. We understand that false statements herein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: _____ Defendant:

Date: _____ Defendant:

THIS CLAIM TO BE FILED WITH:

Sheriff of Columbia County
Court House – P.O. Box 360
35 West Main Street
Bloomsburg, PA 17815
(570) 389-5622

Note: Under paragraphs (1) and (2) of the writ, a description of specific property to be levied upon or attached may be set forth in the writ or included in a separate direction to the sheriff.

Under paragraph (2) of the writ, if attachment of a named garnishee is desired, his name should be set forth in the space provided.

Under paragraph (3) of the writ, the sheriff may, as under prior practice, add as a garnishee any person not named in this writ who may be found in possession of property of defendant. See Rule 3111(a). For limitations on the power to attach tangible personal property, see Rule 3108(a).

(b) Each court shall by local rule designate the officer, organization or person to be named in the notice.

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX ATTORNEYS AT LAW, P.C.

BY: BENJAMIN E. WITMER, ESQUIRE

Identification No. 89100

706 One Montgomery Plaza

Norristown, PA 19401

(610) 275-7990

(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES

OF PENNSYLVANIA, INC., successor

By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.

132 West Front Street

Berwick, PA 18603

vs.

VERNON E. GROSS and

DAWN LONGENBERGER

1112 W. Front Street

Berwick, PA 18603

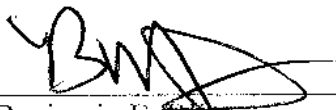
COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562

2012-ED-94

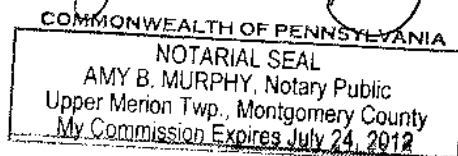
ACT 91 CERTIFICATION

I, Benjamin E. Witmer, Esquire, attorney for plaintiff, American General Consumer Discount Company, being duly sworn according to law, depose and say that to the best of his knowledge, information and belief, a notice of possible eligibility for the emergency mortgage assistance program were sent to the defendant at his address, pursuant to Act 91 of 1983 on January 23, 2012 and January 24, 2012. Plaintiff has not been notified of any action by the Pennsylvania Housing Finance Agency which would bar it from proceeding with this foreclosure under Act 91.


Benjamin E. Witmer
Attorney for Plaintiff

Sworn to and subscribed
before me this 3rd day
of July, 2012.


Notary Public



FOX AND FOX ATTORNEYS AT LAW, P.C.
BY: BENJAMIN E. WITMER, ESQUIRE
Identification No. 89100
706 One Montgomery Plaza
Norristown, PA 19401
(610) 275-7990
(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562


2012-ED-94

AFFIDAVIT OF NON-MILITARY SERVICE

THE UNDERSIGNED being duly sworn, states that he is over the age of eighteen years and competent to make this affidavit and the following averments are based upon the results of an internet search and/or the records and information provided to the undersigned by Plaintiff. To the best of his knowledge, the above-captioned Defendants' last known address is as set forth in the caption and they are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended.

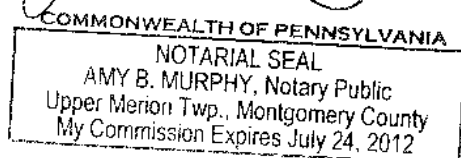
FOX AND FOX ATTORNEYS AT LAW, P.C.

BY:


Benjamin E. Witmer,
Attorney for Plaintiff

Sworn to and subscribed
before me this 9th day
of July 2012


Notary Public



LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX ATTORNEYS AT LAW, P.C.

BY: BENJAMIN E. WITMER, ESQUIRE

Identification No. 89100

706 One Montgomery Plaza

Norristown, PA 19401

(610) 275-7990

(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES

OF PENNSYLVANIA, INC., successor

By merger to AMERICAN GENERAL

FINANCIAL SERVICES, INC.

132 West Front Street

Berwick, PA 18603

vs.

VERNON E. GROSS and

DAWN LONGENBERGER

1112 W. Front Street

Berwick, PA 18603

COURT OF COMMON PLEAS

COLUMBIA COUNTY, PA

No. 2012-CV-562

2012-ED-94

WAIVER OF WATCHMAN/WAIVER OF INSURANCE - Any Deputy Sheriff levying upon or attaching any property under which writ may leave same without a watchman, in custody of whoever is found in possession, after notifying such person of such levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof; and the Sheriff is hereby released from all liability to protect the property described in the above execution by insurance, which insurance is hereby waived.



Benjamin E. Witmer,
Attorney for Plaintiff

FOX AND FOX ATTORNEYS AT LAW, P.C.
BY: BENJAMIN E. WITMER, ESQUIRE
Identification No. 89100
706 One Montgomery Plaza
Norristown, PA 19401
(610) 275-7990
(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562


2012-ED-94

AFFIDAVIT OF WHEREABOUTS OF DEFENDANTS

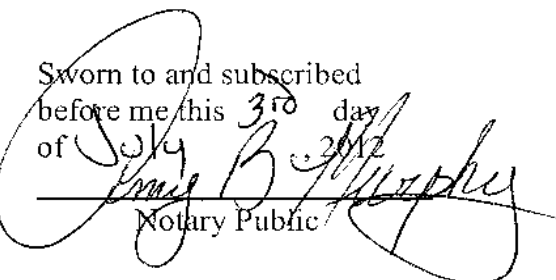
I, Benjamin E. Witmer, Esquire, attorney for plaintiff, Springleaf Financial Services of Pennsylvania, Inc., successor by merger to American General Financial Services, Inc., being duly sworn according to law, depose and say that to the best of his knowledge, information and belief that the last known address of Defendants is 1112 W. Front Street, Berwick, PA 18603.

FOX AND FOX ATTORNEYS AT LAW, P.C.

BY:


Benjamin E. Witmer,
Attorney for Plaintiff

Sworn to and subscribed
before me this 3rd day
of July 2012


Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

AMY B. MURPHY, Notary Public
Upper Merion Twp., Montgomery County
My Commission Expires July 24, 2012

FOX AND FOX
ATTORNEYS AT LAW, P.C.
425 SWEDE STREET
SUITE 706
ONE MONTGOMERY PLAZA
NORRISTOWN, PA 19401-4825

LEON H. FOX, JR.[□]
CRAIG H. FOX^{□**}
JEFFREY V. MATTEO[□]
PETER H. THOMAS[□]
JOSEPH B. WASSEL^{□*}
BENJAMIN E. WITMER^{□#}
JESSICA A. MILLER^{□*}

(610) 275-7990
Fax (610) 275-2866
www.foxandfoxlaw.com
info@foxandfoxlaw.com

LEON H. FOX
1901-1982

JAMES P. FOX
1936-1999

SHIRLEE ANN MILLER
ESTATE PARALEGAL

□ ADMITTED TO PENNSYLVANIA BAR
* ADMITTED TO NEW JERSEY BAR ALSO
+ ADMITTED TO FLORIDA BAR ALSO
MASTERS IN BUSINESS ADMINISTRATION

June 29, 2012

Sheriff of Columbia County
35 West Main Street
P.O. Box 360
Bloomsburg, PA 17815

**Re: Springleaf Financial Services of Pennsylvania, Inc.
Successor by merger to American General
Financial Services, Inc. v. Gross and Longenberger
Our File No. 10100.01**

Dear Sir/Madam:

I have attached hereto for service three (3) copies of a Writ of Execution package. Kindly list the property for next available sale date. I have enclosed our firm check in the sum of \$1,350.00 representing the requisite deposit.

In the meantime, would you kindly serve defendants, Vernon E. Gross and Dawn Longenberger, personally with a copy of the Writ package and Notice of Sale and provide me with a copy of the sale date.

Should you need any additional information to facilitate this request, kindly contact me by phone. Thank you in advance for your kind attention and assistance.

Sincerely,

Benjamin E. Witmer

BEW/abm
Enclosure

WRIT OF EXECUTION – (MORTGAGE FORECLOSURE)
P.R.C.P. 3180 to 3183 and Rule 3257

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

: COURT OF COMMON PLEAS
: COLUMBIA COUNTY, PA
:
:
: No. 2012-CV-562
:
: 2012-ED-94
:
:
: WRIT OF EXECUTION
: (MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:
County of Columbia

TO THE SHERIFF OF FAYETTE COUNTY, PENNSYLVANIA

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

1109 Sterling Avenue
Berwick, PA 18603

Amount Due: \$ 56,370.09
Interest from: 3/7/2012 \$ 14.11 per day

Total: \$ _____ Plus costs

As endorsed:

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

Date: July 5, 2012
(Seal)

Proth & Clk. of Gov. Courts
My Com. Exp. 1st Monday in 2016

Clerk

NO. 2012-CV-562 2012-ED-94

IN THE COURT OF COMMON PLEAS OF
COLUMBIA COUNTY, PENNSYLVANIA

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.

vs.

VERNON E. GROSS and
DAWN LONGENBERGER

WRIT OF EXECUTION
(Mortgage Foreclosure)

COSTS:

Prothonotary: Complaint	\$	<u>115.00</u>
Judgment Fee:	\$	<u>15.00</u>
Writ	\$	<u>25.00</u>
Satisfaction:	\$	<u>10.00</u>

Benjamin E. Witmer, Esquire
FOX AND FOX ATTORNEYS AT LAW, P.C.
425 Swede Street
Suite 706 – One Montgomery Plaza
Norristown, PA 19401
Attorney ID # 89100

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

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

Name	Address (if address cannot be reasonably ascertained, please so indicate)
VERNON E. GROSS	1112 W. Front Street Berwick, PA 18603
DAWN LONGENBERGER	1112 W. Front Street Berwick, PA 18603

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

a) Columbia County Tax Claim Bureau	a) 35 W. Main Street Bloomsburg, PA 17815
b) Domestic Relations of Columbia County	b) 35 W. Main Street Bloomsburg, PA 17815
c) Borough of Berwick 570-752-2723	c) 1800 N. Market Street Berwick, PA 18603
d) Berwick Area School District (570)759-6400	d) 500 Line Road Berwick, PA 18603
e) PA Dept. of Public Welfare	e) Bureau of Child Support Enforcement P.O. Box 8018 Harrisburg, PA 17105-8018
f) PA Dept. of Revenue	f) The Bureau of Compliance Attn: Sheriff Sale Section P.O. Box 218230 Harrisburg, PA 17128-1230

- | | | | |
|----|---|----|--|
| g) | Commonwealth of PA | g) | Bureau of Individual Tax
Inheritance Tax Division
6th fl., Strawberry Square
Dept. #280601
Harrisburg, A 17128 |
| h) | Inheritance Tax Division | h) | PA Department of Revenue
Bureau of Individual Taxes
Dept. 280601
Harrisburg, PA 17128-0601 |
| i) | Internal Revenue Service | i) | Federal Estate Tax
Chief Examination Division
Group 1820
P.O. Box 331
Bensalem, PA 19020 |
| j) | USA/Internal Revenue Serv. | j) | Federal Estate Tax
Special Procedures Branch
1000 Liberty Avenue, Rm. 112
Pittsburgh, PA 15222-4003 |
| k) | Commonwealth of Penn. | k) | Dept. of Public Welfare
TPL Casualty Unit
Estate Recovery Program
P.O. Box 8486
Willow Oak Building
Harrisburg, PA 17105-8486 |
| l) | Commonwealth of PA | l) | Inheritance Tax Office
1400 Spring Garden Street
Philadelphia, PA 19130 |
| n) | Register of Wills
of Columbia County | n) | 35 West Main Street
Bloomsburg, PA 17815 |
| o) | Berwick Area Joint Sewer
Authority | o) | 1800 N. Market Street
Berwick, PA 18603 |

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

Name

Address (if address cannot be reasonably
ascertained, please so indicate)

- | | | | |
|----|--|----|--|
| a) | Springleaf Financial
Services of Pennsylvania,
Inc., fka American General
Consumer Discount Company | a) | 132 W. Front Street
Berwick, PA 18603 |
|----|--|----|--|

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

Only those listed in 3 and 4 above.

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

Name	Address (if address cannot be reasonably ascertained, please so indicate)
------	--

Only those listed in 3 and 4 above.

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

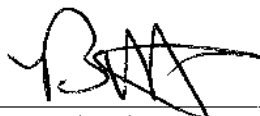
Name	Address (if address cannot be reasonably ascertained, please so indicate)
------	--

Only those listed in 3 and 4 above.

I verify that I am the attorney for the plaintiff, Springleaf Financial Services of
Pennsylvania, Inc., fka American General Consumer Discount Company, in this action; that I am
authorized to take this Verification on their behalf; and that the statements made in this
Verification are true and correct to the best of my personal knowledge, information and belief. I
understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section

4909 relating to unsworn falsification to authorities.

Date: 7/3/12

A handwritten signature in black ink, appearing to be 'B. Witmer', written over a horizontal line.

Benjamin E. Witmer
Attorney for Plaintiff

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX
ATTORNEYS AT LAW, P.C.
425 SWEDE STREET
SUITE 706
ONE MONTGOMERY PLAZA
NORRISTOWN, PA 19401-4825

LEON H. FOX, JR.^U
CRAIG H. FOX^{C**}
JEFFREY V. MATTEO^E
PETER H. THOMAS^U
JOSEPH B. WASSEL^{D*}
BENJAMIN E. WITMER^{D#}
JESSICA A. MILLER^{D*}

(610) 275-7990
Fax (610) 275-2866
www.foxandfoxlaw.com
info@foxandfoxlaw.com

LEON H. FOX
1901-1982

JAMES P. FOX
1936-1999

SHIRLEE ANN MILLER
ESTATE PARALEGAL

^U ADMITTED TO PENNSYLVANIA BAR
^{*} ADMITTED TO NEW JERSEY BAR ALSO
⁺ ADMITTED TO FLORIDA BAR ALSO
[#] MASTERS IN BUSINESS ADMINISTRATION

July 3, 2012

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

TO: All Parties In Interest And Claimants

OWNER(S): VERNON E. GROSS and DAWN LONGENBERGER


PROPERTY: 1109 Sterling Avenue, Berwick, PA 18603
See attached description)

IMPROVEMENTS: Residential Dwelling

TAX PARCEL(S): 04C-03-013

The above-captioned property is scheduled to be sold on Wednesday, _____, 2012 at 9:00 a.m., at the Sheriff's office, Courthouse, 35 West Main Street, Bloomsburg, PA 17815. Our records indicate that you may hold a mortgage or judgment on the properties 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. You should check with the Sheriff's Office, by calling (570) 389-5622, to determine the actual date and time of the filing of said schedule.



Benjamin E. Witmer
Attorney for Plaintiff

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

Your real estate located at 1109 Sterling Avenue, Berwick, Columbia County, Pennsylvania 18603 (See property description attached) is scheduled to be sold at Sheriff's Sale on Wednesday, _____ at 9:00 a.m., at the Sheriff's Office, Courthouse, 35 West Main Street, Bloomsburg, PA 17815, to enforce the presently outstanding court judgment of \$56,370.09, plus interest at the contract rate and costs, obtained by Springleaf Financial Services of Pennsylvania, Inc., successor by merger to American General Financial Services, Inc. against you.

NOTICE OF OWNER'S RIGHTS

YOU MAY BE ABLE TO PREVENT THIS SHERIFF'S SALE

1. This sale will be canceled if you pay the judgment to Benjamin E. Witmer, Esquire, 706 One Montgomery Plaza, Norristown, PA 19401. To find out how much you must pay, you may call (610) 275-7990.

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.

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 the Sheriff's Office at (570) 389-5622 or Benjamin E. Witmer, Esquire, at (610) 275-7990.

2. You may be able to petition the court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.

3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened you may call the Sheriff's Office at (570) 389-5622 or Benjamin E. Witmer, Esquire at (610) 275-7990.

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(s) until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.

6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money bid for your house will be filed by the Sheriff on the 30th day after the sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days of the preparation of the schedule of distribution.

7. You may also have other rights and defenses, or ways of getting your house back, if you act immediately after the sale.

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

**Northpenn Legal Services
(for Columbia County)
168 E. 5th Street
Bloomsburg, PA 17815
(570) 784-8760**

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

- (1) Fill out the attached claim form and demand for a promptly hearing.
- (2) Deliver the form or mail it to the Sheriff's Office at the address notice. You should come to court ready to explain your exemption. If you do not come to court and prove your exemptions, you may lose some of your property.

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

**Northpenn Legal Services
(for Columbia County)
168 E. 5th Street
Bloomsburg, PA 17815
(570) 784-8760**

MAJOR EXEMPTIONS UNDER PENNSYLVANIA AND FEDERAL LAW

1. \$300 statutory exemption
2. Bibles, school books, sewing machines uniforms and equipment.
3. most wages and unemployment compensation
4. Social Security Benefits
5. Certain retirement fund and accounts
6. Certain veteran and armed forces benefits
7. Certain insurance proceeds
8. Such other exemptions as may be provided by law

CLAIM FOR EXEMPTION

TO THE SHERIFF:

We, the above-named defendants, claim exemption of property from levy or attachment:

(1) From my personal property in my possession which has _____ been levied upon,

(a) I desire that my \$300 Statutory exemption be

☐ (I) set aside in kind (specify property to be set aside in kind):

☐ (II) paid in cash following the sale of the property levied upon; or

(b) I claim the following exemption (specify property and basis of exemption):

(2) From my property which is in the possession of a third party, I claim the following exemptions:

(a) my \$300 statutory exemption ☐ in cash; ☐ in kind (specify property):

_____;

(b) Social Security benefits on deposit in the amount of: \$_____;

(c) other (specify amount and basis of exemption):

I request a prompt court hearing to determine the exemption. Notice of the hearing should be given to me at

(Address)

(Telephone Number)

We verify that the statements made in this Claim for Exemption are true and correct. We understand that false statements herein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: _____ Defendant:

Date: _____ Defendant:

THIS CLAIM TO BE FILED WITH:

Sheriff of Columbia County
Court House – P.O. Box 360
35 West Main Street
Bloomsburg, PA 17815
(570) 389-5622

Note: Under paragraphs (1) and (2) of the writ, a description of specific property to be levied upon or attached may be set forth in the writ or included in a separate direction to the sheriff.

Under paragraph (2) of the writ, if attachment of a named garnishee is desired, his name should be set forth in the space provided.

Under paragraph (3) of the writ, the sheriff may, as under prior practice, add as a garnishee any person not named in this writ who may be found in possession of property of defendant. See Rule 3111(a). For limitations on the power to attach tangible personal property, see Rule 3108(a).

(b) Each court shall by local rule designate the officer, organization or person to be named in the notice.

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX ATTORNEYS AT LAW, P.C.

BY: BENJAMIN E. WITMER, ESQUIRE

Identification No. 89100

706 One Montgomery Plaza

Norristown, PA 19401

(610) 275-7990

(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES

OF PENNSYLVANIA, INC., successor

By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.

132 West Front Street

Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER

1112 W. Front Street

Berwick, PA 18603

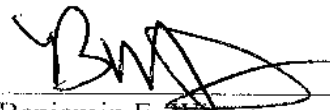
COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562

2012-ED-94

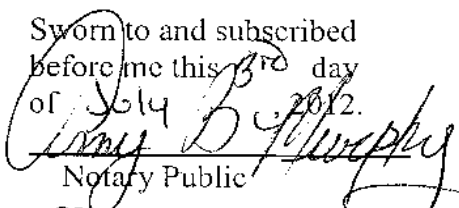
ACT 91 CERTIFICATION

I, Benjamin E. Witmer, Esquire, attorney for plaintiff, American General Consumer Discount Company, being duly sworn according to law, depose and say that to the best of his knowledge, information and belief, a notice of possible eligibility for the emergency mortgage assistance program were sent to the defendant at his address, pursuant to Act 91 of 1983 on January 23, 2012 and January 24, 2012. Plaintiff has not been notified of any action by the Pennsylvania Housing Finance Agency which would bar it from proceeding with this foreclosure under Act 91.



Benjamin E. Witmer
Attorney for Plaintiff

Sworn to and subscribed
before me this 3rd day
of July 2012.


Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

AMY B. MURPHY, Notary Public

Upper Merion Twp., Montgomery County
My Commission Expires July 24, 2012

FOX AND FOX ATTORNEYS AT LAW, P.C.

BY: BENJAMIN E. WITMER, ESQUIRE

Identification No. 89100

706 One Montgomery Plaza

Norristown, PA 19401

(610) 275-7990

(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES

OF PENNSYLVANIA, INC., successor

By merger to AMERICAN GENERAL

FINANCIAL SERVICES, INC.

132 West Front Street

Berwick, PA 18603

vs.

VERNON E. GROSS and

DAWN LONGENBERGER

1112 W. Front Street

Berwick, PA 18603

COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562


2012-ED-94

AFFIDAVIT OF NON-MILITARY SERVICE

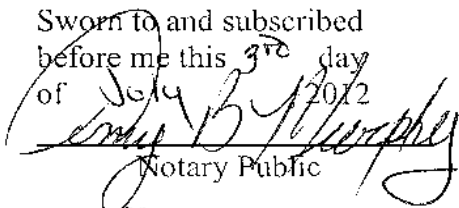
THE UNDERSIGNED being duly sworn, states that he is over the age of eighteen years and competent to make this affidavit and the following averments are based upon the results of an internet search and/or the records and information provided to the undersigned by Plaintiff. To the best of his knowledge, the above-captioned Defendants' last known address is as set forth in the caption and they are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended.

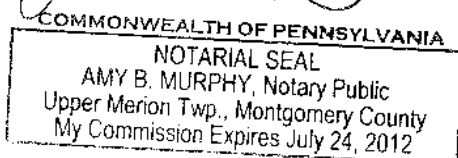
FOX AND FOX ATTORNEYS AT LAW, P.C.

BY:


Benjamin E. Witmer,
Attorney for Plaintiff

Sworn to and subscribed
before me this 3rd day
of July 2012


Notary Public



LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX ATTORNEYS AT LAW, P.C.

BY: BENJAMIN E. WITMER, ESQUIRE

Identification No. 89100

706 One Montgomery Plaza

Norristown, PA 19401

(610) 275-7990

(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES

OF PENNSYLVANIA, INC., successor

**By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.**

132 West Front Street

Berwick, PA 18603

vs.

**VERNON E. GROSS and
DAWN LONGENBERGER**

1112 W. Front Street

Berwick, PA 18603

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

: No. 2012-CV-562
:
:

: 2012-ED-94
:
:

:
:
:
:
:
:

WAIVER OF WATCHMAN/WAIVER OF INSURANCE - Any Deputy Sheriff levying upon or attaching any property under which writ may leave same without a watchman, in custody of whoever is found in possession, after notifying such person of such levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof; and the Sheriff is hereby released from all liability to protect the property described in the above execution by insurance, which insurance is hereby waived.



Benjamin E. Witmer,
Attorney for Plaintiff

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. I. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX ATTORNEYS AT LAW, P.C.
BY: BENJAMIN E. WITMER, ESQUIRE
Identification No. 89100
706 One Montgomery Plaza
Norristown, PA 19401
(610) 275-7990
(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562


2012-ED-94

AFFIDAVIT OF WHEREABOUTS OF DEFENDANTS

I, Benjamin E. Witmer, Esquire, attorney for plaintiff, Springleaf Financial Services of Pennsylvania, Inc., successor by merger to American General Financial Services, Inc., being duly sworn according to law, depose and say that to the best of his knowledge, information and belief that the last known address of Defendants is 1112 W. Front Street, Berwick, PA 18603.

FOX AND FOX ATTORNEYS AT LAW, P.C.

BY:


Benjamin E. Witmer,
Attorney for Plaintiff

Sworn to and subscribed
before me this 3rd day
of July 2012


Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
AMY B. MURPHY, Notary Public
Upper Merion Twp., Montgomery County
My Commission Expires July 24, 2012

WRIT OF EXECUTION – (MORTGAGE FORECLOSURE)
P.R.C.P. 3180 to 3183 and Rule 3257

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

: **COURT OF COMMON PLEAS**
: **COLUMBIA COUNTY, PA**
:
:
:
: No. 2012-CV-562
:
: 2012-ED-94
:
:
: **WRIT OF EXECUTION**
: **(MORTGAGE FORECLOSURE)**

Commonwealth of Pennsylvania:
County of Columbia

TO THE SHERIFF OF FAYETTE COUNTY, PENNSYLVANIA

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

1109 Sterling Avenue
Berwick, PA 18603

Amount Due: \$ 56,370.09
Interest from: 3/7/2012 \$ 14.11 per day

Total: \$ _____ Plus costs

As endorsed:

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

Date: July 5, 2012
(Seal)

Proth & Clerk of Sev. Courts
My Com. Ex. 1st Monday in 2016

Clerk

NO. 2012-CV-562 2012-ED-94

IN THE COURT OF COMMON PLEAS OF
COLUMBIA COUNTY, PENNSYLVANIA

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.

vs.

VERNON E. GROSS and
DAWN LONGENBERGER

WRIT OF EXECUTION
(Mortgage Foreclosure)

COSTS:

Prothonotary:	\$	<u>115.00</u>
Judgment Fee:	\$	<u>15.00</u>
Writ	\$	<u>25.00</u>
Satisfaction:	\$	<u>10.00</u>

Benjamin E. Witmer, Esquire
FOX AND FOX ATTORNEYS AT LAW, P.C.
425 Swede Street
Suite 706 – One Montgomery Plaza
Norristown, PA 19401
Attorney ID # 89100

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX ATTORNEYS AT LAW, P.C.
BY: BENJAMIN E. WITMER, ESQUIRE

Identification No. 89100
706 One Montgomery Plaza
Norristown, PA 19401
(610) 275-7990
(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562

2012-ED-94

AFFIDAVIT PURSUANT TO RULE 3129.1,2,3

AMERICAN GENERAL CONSUMER DISCOUNT COMPANY, Plaintiff in the above-captioned action, comes by its attorney and sets forth, as of the date the Praecipe for Writ of Execution was filed, the following information concerning the real property located at 1109 Sterling Avenue, Columbia County, Berwick, PA 18603 (see property descriptions attached).

1. Name and address of Owners or Reputed Owners:

Name

Address (if address cannot be reasonably
ascertained, please so indicate)

VERNON E. GROSS

1112 W. Front Street
Berwick, PA 18603

DAWN LONGENBERGER

1112 W. Front Street
Berwick, PA 18603

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

Name	Address (if address cannot be reasonably ascertained, please so indicate)
VERNON E. GROSS	1112 W. Front Street Berwick, PA 18603
DAWN LONGENBERGER	1112 W. Front Street Berwick, PA 18603

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

a) Columbia County Tax Claim Bureau	a) 35 W. Main Street Bloomsburg, PA 17815
b) Domestic Relations of Columbia County	b) 35 W. Main Street Bloomsburg, PA 17815
c) Borough of Berwick 570-752-2723	c) 1800 N. Market Street Berwick, PA 18603
d) Berwick Area School District (570)759-6400	d) 500 Line Road Berwick, PA 18603
e) PA Dept. of Public Welfare	e) Bureau of Child Support Enforcement P.O. Box 8018 Harrisburg, PA 17105-8018
f) PA Dept. of Revenue	f) The Bureau of Compliance Attn: Sheriff Sale Section P.O. Box 218230 Harrisburg, PA 17128-1230

- | | | | |
|----|---|----|--|
| g) | Commonwealth of PA | g) | Bureau of Individual Tax
Inheritance Tax Division
6th fl., Strawberry Square
Dept. #280601
Harrisburg, A 17128 |
| h) | Inheritance Tax Division | h) | PA Department of Revenue
Bureau of Individual Taxes
Dept. 280601
Harrisburg, PA 17128-0601 |
| i) | Internal Revenue Service | i) | Federal Estate Tax
Chief Examination Division
Group 1820
P.O. Box 331
Bensalem, PA 19020 |
| j) | USA/Internal Revenue Serv. | j) | Federal Estate Tax
Special Procedures Branch
1000 Liberty Avenue, Rm. 112
Pittsburgh, PA 15222-4003 |
| k) | Commonwealth of Penn. | k) | Dept. of Public Welfare
TPL Casualty Unit
Estate Recovery Program
P.O. Box 8486
Willow Oak Building
Harrisburg, PA 17105-8486 |
| l) | Commonwealth of PA | l) | Inheritance Tax Office
1400 Spring Garden Street
Philadelphia, PA 19130 |
| n) | Register of Wills
of Columbia County | n) | 35 West Main Street
Bloomsburg, PA 17815 |
| o) | Berwick Area Joint Sewer
Authority | o) | 1800 N. Market Street
Berwick, PA 18603 |

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

Name

Address (if address cannot be reasonably
ascertained, please so indicate)

- | | | | |
|----|--|----|--|
| a) | Springleaf Financial
Services of Pennsylvania,
Inc., fka American General
Consumer Discount Company | a) | 132 W. Front Street
Berwick, PA 18603 |
|----|--|----|--|

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

Only those listed in 3 and 4 above.

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

Name	Address (if address cannot be reasonably ascertained, please so indicate)
------	--

Only those listed in 3 and 4 above.

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

Name	Address (if address cannot be reasonably ascertained, please so indicate)
------	--

Only those listed in 3 and 4 above.

I verify that I am the attorney for the plaintiff, Springleaf Financial Services of
Pennsylvania, Inc., fka American General Consumer Discount Company, in this action; that I am
authorized to take this Verification on their behalf; and that the statements made in this
Verification are true and correct to the best of my personal knowledge, information and belief. I
understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section

4909 relating to unsworn falsification to authorities.

Date: 7/3/12

A handwritten signature in black ink, appearing to be 'B. Witmer', written over a horizontal line.

Benjamin E. Witmer
Attorney for Plaintiff

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX
ATTORNEYS AT LAW, P.C.
425 SWEDE STREET
SUITE 706
ONE MONTGOMERY PLAZA
NORRISTOWN, PA 19401-4825

(610) 275-7990
Fax (610) 275-2866
www.foxandfoxlaw.com
info@foxandfoxlaw.com

LEON H. FOX, JR.^U
CRAIG H. FOX^{U**}
JEFFREY V. MATTEO^U
PETER H. THOMAS^U
JOSEPH B. WASSEL^{U*}
BENJAMIN E. WITMER^{U#}
JESSICA A. MILLER^{U*}

^U ADMITTED TO PENNSYLVANIA BAR
^{*} ADMITTED TO NEW JERSEY BAR ALSO
^{*} ADMITTED TO FLORIDA BAR ALSO
[#] MASTERS IN BUSINESS ADMINISTRATION

LEON H. FOX
1901-1982

JAMES P. FOX
1936-1999

SHIRLEE ANN MILLER
ESTATE PARALEGAL

July 3, 2012

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

TO: All Parties In Interest And Claimants

OWNER(S): VERNON E. GROSS and DAWN LONGENBERGER

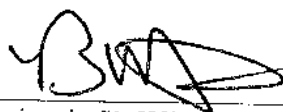
PROPERTY: 1109 Sterling Avenue, Berwick, PA 18603
See attached description)

IMPROVEMENTS: Residential Dwelling

TAX PARCEL(S): 04C-03-013

The above-captioned property is scheduled to be sold on Wednesday, _____, 2012 at 9:00 a.m., at the Sheriff's office, Courthouse, 35 West Main Street, Bloomsburg, PA 17815. Our records indicate that you may hold a mortgage or judgment on the properties 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. You should check with the Sheriff's Office, by calling (570) 389-5622, to determine the actual date and time of the filing of said schedule.



Benjamin E. Witmer
Attorney for Plaintiff

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX ATTORNEYS AT LAW, P.C.
BY: BENJAMIN E. WITMER, ESQUIRE
Identification No. 89100
706 One Montgomery Plaza
Norristown, PA 19401
(610) 275-7990
(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562

2012-ED-94

NOTICE OF SHERIFF'S SALE OF REAL PROPERTY

To: VERNON E. GROSS
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

Your real estate located at 1109 Sterling Avenue, Berwick, Columbia County, Pennsylvania 18603 (See property description attached) is scheduled to be sold at Sheriff's Sale on Wednesday, _____ at 9:00 a.m., at the Sheriff's Office, Courthouse, 35 West Main Street, Bloomsburg, PA 17815, to enforce the presently outstanding court judgment of \$56,370.09, plus interest at the contract rate and costs, obtained by Springleaf Financial Services of Pennsylvania, Inc., successor by merger to American General Financial Services, Inc. against you.

NOTICE OF OWNER'S RIGHTS

YOU MAY BE ABLE TO PREVENT THIS SHERIFF'S SALE

1. This sale will be canceled if you pay the judgment to Benjamin E. Witmer, Esquire, 706 One Montgomery Plaza, Norristown, PA 19401. To find out how much you must pay, you may call (610) 275-7990.

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.

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 the Sheriff's Office at (570) 389-5622 or Benjamin E. Witmer, Esquire, at (610) 275-7990.

2. You may be able to petition the court to set aside the sale if the bid price was grossly inadequate compared to the value of your property.

3. The sale will go through only if the buyer pays the Sheriff the full amount due in the sale. To find out if this has happened you may call the Sheriff's Office at (570) 389-5622 or Benjamin E. Witmer, Esquire at (610) 275-7990.

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(s) until the full amount due is paid to the Sheriff and the Sheriff gives a deed to the buyer. At that time, the buyer may bring legal proceedings to evict you.

6. You may be entitled to a share of the money which was paid for your house. A schedule of distribution of the money bid for your house will be filed by the Sheriff on the 30th day after the sale. This schedule will state who will be receiving that money. The money will be paid out in accordance with this schedule unless exceptions (reasons why the proposed distribution is wrong) are filed with the Sheriff within ten (10) days of the preparation of the schedule of distribution.

7. You may also have other rights and defenses, or ways of getting your house back, if you act immediately after the sale.

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

**Northpenn Legal Services
(for Columbia County)
168 E. 5th Street
Bloomsburg, PA 17815
(570) 784-8760**

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

- (1) Fill out the attached claim form and demand for a promptly hearing.
- (2) Deliver the form or mail it to the Sheriff's Office at the address notice. You should come to court ready to explain your exemption. If you do not come to court and prove your exemptions, you may lose some of your property.

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

**Northpenn Legal Services
(for Columbia County)
168 E. 5th Street
Bloomsburg, PA 17815
(570) 784-8760**

MAJOR EXEMPTIONS UNDER PENNSYLVANIA AND FEDERAL LAW

1. \$300 statutory exemption
2. Bibles, school books, sewing machines uniforms and equipment.
3. most wages and unemployment compensation
4. Social Security Benefits
5. Certain retirement fund and accounts
6. Certain veteran and armed forces benefits
7. Certain insurance proceeds
8. Such other exemptions as may be provided by law

CLAIM FOR EXEMPTION

TO THE SHERIFF:

We, the above-named defendants, claim exemption of property from levy or attachment:

(1) From my personal property in my possession which has been levied upon,

(a) I desire that my \$300 Statutory exemption be

☐ (I) set aside in kind (specify property to be set aside in kind):

☐ (II) paid in cash following the sale of the property levied upon; or

(b) I claim the following exemption (specify property and basis of exemption):

(2) From my property which is in the possession of a third party, I claim the following exemptions:

(a) my \$300 statutory exemption ☐ in cash; ☐ in kind (specify property):
_____;

(b) Social Security benefits on deposit in the amount of: \$_____;

(c) other (specify amount and basis of exemption):

I request a prompt court hearing to determine the exemption. Notice of the hearing should be given to me at

(Address)

(Telephone Number)

We verify that the statements made in this Claim for Exemption are true and correct. We understand that false statements herein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: _____ Defendant:

Date: _____ Defendant:

THIS CLAIM TO BE FILED WITH:

Sheriff of Columbia County
Court House - P.O. Box 360
35 West Main Street
Bloomsburg, PA 17815
(570) 389-5622

Note: Under paragraphs (1) and (2) of the writ, a description of specific property to be levied upon or attached may be set forth in the writ or included in a separate direction to the sheriff.

Under paragraph (2) of the writ, if attachment of a named garnishee is desired, his name should be set forth in the space provided.

Under paragraph (3) of the writ, the sheriff may, as under prior practice, add as a garnishee any person not named in this writ who may be found in possession of property of defendant. See Rule 3111(a). For limitations on the power to attach tangible personal property, see Rule 3108(a).

(b) Each court shall by local rule designate the officer, organization or person to be named in the notice.

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX ATTORNEYS AT LAW, P.C.

BY: BENJAMIN E. WITMER, ESQUIRE

Identification No. 89100

706 One Montgomery Plaza

Norristown, PA 19401

(610) 275-7990

(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES

OF PENNSYLVANIA, INC., successor

By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.

132 West Front Street

Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER

1112 W. Front Street

Berwick, PA 18603

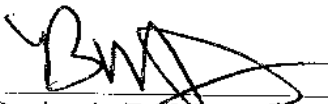
COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562

2012-ED-94

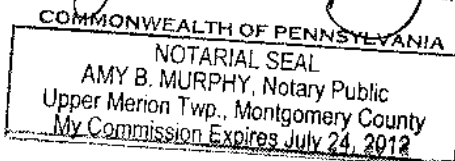
ACT 91 CERTIFICATION

I, Benjamin E. Witmer, Esquire, attorney for plaintiff, American General Consumer Discount Company, being duly sworn according to law, depose and say that to the best of his knowledge, information and belief, a notice of possible eligibility for the emergency mortgage assistance program were sent to the defendant at his address, pursuant to Act 91 of 1983 on January 23, 2012 and January 24, 2012. Plaintiff has not been notified of any action by the Pennsylvania Housing Finance Agency which would bar it from proceeding with this foreclosure under Act 91.


Benjamin E. Witmer
Attorney for Plaintiff

Sworn to and subscribed
before me this 30th day
of July 2012.


Notary Public



FOX AND FOX ATTORNEYS AT LAW, P.C.
BY: BENJAMIN E. WITMER, ESQUIRE
Identification No. 89100
706 One Montgomery Plaza
Norristown, PA 19401
(610) 275-7990
(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562


2012-ED-94

AFFIDAVIT OF NON-MILITARY SERVICE

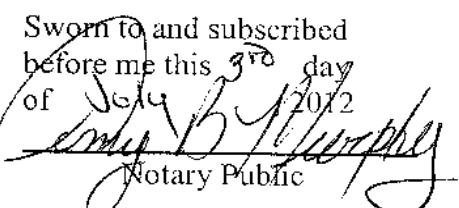
THE UNDERSIGNED being duly sworn, states that he is over the age of eighteen years and competent to make this affidavit and the following averments are based upon the results of an internet search and/or the records and information provided to the undersigned by Plaintiff. To the best of his knowledge, the above-captioned Defendants' last known address is as set forth in the caption and they are not in the Military or Naval Service of the United States of America or its Allies as defined in the Soldiers and Sailors Civil Relief Act of 1940, as amended.

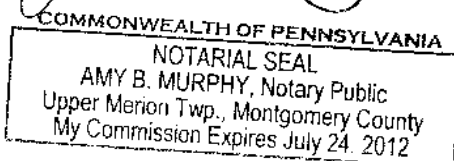
FOX AND FOX ATTORNEYS AT LAW, P.C.

BY:


Benjamin E. Witmer,
Attorney for Plaintiff

Sworn to and subscribed
before me this 3rd day
of July 2012


Notary Public



LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX ATTORNEYS AT LAW, P.C.
BY: BENJAMIN E. WITMER, ESQUIRE

Identification No. 89100
706 One Montgomery Plaza
Norristown, PA 19401
(610) 275-7990
(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562

2012-ED-94

WAIVER OF WATCHMAN/WAIVER OF INSURANCE - Any Deputy Sheriff levying upon or attaching any property under which writ may leave same without a watchman, in custody of whoever is found in possession, after notifying such person of such levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof; and the Sheriff is hereby released from all liability to protect the property described in the above execution by insurance, which insurance is hereby waived.



Benjamin E. Witmer,
Attorney for Plaintiff

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

FOX AND FOX ATTORNEYS AT LAW, P.C.
BY: BENJAMIN E. WITMER, ESQUIRE
Identification No. 89100
706 One Montgomery Plaza
Norristown, PA 19401
(610) 275-7990
(610) 275-2866 fax

Attorney for Plaintiff

SPRINGLEAF FINANCIAL SERVICES
OF PENNSYLVANIA, INC., successor
By merger to AMERICAN GENERAL
FINANCIAL SERVICES, INC.
132 West Front Street
Berwick, PA 18603

vs.

VERNON E. GROSS and
DAWN LONGENBERGER
1112 W. Front Street
Berwick, PA 18603

COURT OF COMMON PLEAS
COLUMBIA COUNTY, PA

No. 2012-CV-562

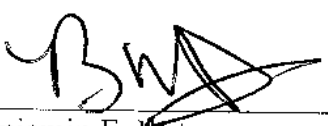
2012-ED-94

AFFIDAVIT OF WHEREABOUTS OF DEFENDANTS

I, Benjamin E. Witmer, Esquire, attorney for plaintiff, Springleaf Financial Services of Pennsylvania, Inc., successor by merger to American General Financial Services, Inc., being duly sworn according to law, depose and say that to the best of his knowledge, information and belief that the last known address of Defendants is 1112 W. Front Street, Berwick, PA 18603.

FOX AND FOX ATTORNEYS AT LAW, P.C.

BY:


Benjamin E. Witmer,
Attorney for Plaintiff

Sworn to and subscribed
before me this 3rd day
of July 2012


Notary Public

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL
AMY B. MURPHY, Notary Public
Upper Merion Twp., Montgomery County
My Commission Expires July 24, 2012

LEGAL DESCRIPTION

ALL THAT CERTAIN lot, piece or parcel of land situate in the Borough of West Berwick (now Borough of Berwick), Columbia County, Pennsylvania, being bounded and described as follows, to-wit:

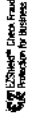
BEGINNING at a corner of Lot No. 8 on Sterling Avenue; thence along Sterling Avenue eastward fifty feet (50') to Lot No. 10; thence north ninety feet (90') to an alley; thence westwardly fifty feet (50') along said alley to corner of Lot No. 8; thence south a distance of ninety feet (90') to Sterling Avenue, the place of beginning. This description is intended to cover and this deed to convey Lot No. 9 in a plot of twenty lots near Ed Hughes fair ground and D. L. & W. R. R.

BEING the same premises which Vernon E. Gross and Lorraine E. Wolfe, by their deed dated April 22, 2002 and recorded in Columbia County at Instrument Number 200204750 on April 22, 2002, granted and conveyed unto Vernon E. Gross.

**FOX AND FOX
ATTORNEYS AT LAW, P.C.**

IOLTA ACCOUNT
425 SWEDE STREET
ONE MONTGOMERY PLAZA, SUITE 706
NORRISTOWN, PA 19401
(610) 275-7990

PNC BANK, N.A.
PHILADELPHIA, PA 020



3806

3-5-310
DATE

AMOUNT

NUMBER

**\$1,350.00

3806

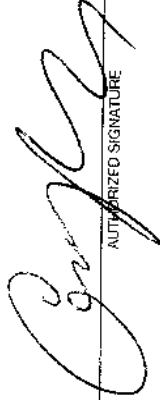
06/29/2012

*** ONE THOUSAND THREE HUNDRED FIFTY & 00/100 DOLLARS

PAY

TO THE
ORDER OF
Sheriff of Columbia County

Springleaf v. Gross


AUTHORIZED SIGNATURE

⑈003806⑈ ⑆031000053⑆ 8620847022⑈

Security features. Details on back.

