

KML LAW GROUP, P.C.

ATTORNEYS AT LAW

SUITE 5000
701 MARKET STREET
PHILADELPHIA, PA 19106
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May 12, 2020

SHERIFF OF COLUMBIA COUNTY
FAX: 570-389-5625

RE: PNC BANK, NATIONAL ASSOCIATION
vs.
ANTONIO GEATTI
No. 2019-CV-1355
KML File#: 197309FC

Property Address: 20 Shawnee Road, Scott Twp a/k/a Bloomsburg, PA 17815
Sheriff's Sale Date: May 27, 2020

To the Sheriff:

Kindly stay the Sheriff's Sale with reference to the above-captioned matter, and if applicable, cease all advertising, service and posting of the property. Please forward an updated cost sheet, summary of outstanding costs and return any unused costs. Pursuant to Act 32 of 2018 (68 Pa. C.S.A §2310), no sheriff's commission is due and owing and therefore no sheriff's commission has been charged to or collected from the Defendants.

The Defendants are provided a copy of this letter to provide them with proof that we have notified the Sheriff that the sale scheduled for May 27, 2020 has been stayed and cancelled.

By: **KML LAW GROUP, P.C.**
Sheriff's Sale Department
Tara Busa – Supervisor
(215) 825-6379
PASALES@KMLLAWGROUP.COM

Attorney Contact: Kevin G. McDonald, Esquire, (215) 825-6311, kmcdonald@kmlawgroup.com

cc:
ANTONIO GEATTI - 1361 Columbia Blvd, Bloomsburg, PA 17815

148

SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain
Sheriff

Earl D. Mordan, Jr.
Chief Deputy



<u>Plaintiff</u>	vs.	<u>Defendant</u>
PNC BANK NATIONAL ASSOCIATION		ANTONIO GEATTI

Attorney for the Plaintiff:
KML LAW GROUP, P.C.
701 MARKET STREET
PHILADELPHIA, PA 19106

Sheriff's Sale Date: Wednesday, March 25, 2020
Writ of Execution No. : 2019CV1355
Advance Sheriff Costs: \$1,350.00

Location of the real estate: 20 SHAWNEE ROAD, 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	\$36.00
Posting Handbill	\$15.00
Press Enterprise Inc.	\$1,523.30
Prothonotary, Acknowledge Deed	\$10.00
Sheriff Automation Fund	\$50.00
Sheriff's Deed	\$35.00
Solicitor Services	\$100.00
Transfer Tax Form	\$25.00
Web Posting	\$100.00
Service	\$195.00
Service Mileage	\$8.00
Distribution Form	\$25.00
Copies	\$6.50
Notary Fee	\$10.00
Surcharge	\$140.00
Total Sheriff Costs	\$2,351.30

Municipal Costs

Delinquent Taxes	\$6,358.88
Sewer	\$1,041.86
Total Municipal Costs	\$7,400.74

Distribution Costs

Recording Fees	\$71.75
Total Distribution Costs	\$71.75

Grand Total: \$9,823.79

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

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

PNC BANK, NATIONAL ASSOCIATION
3232 Newmark Drive
Miamisburg, OH 45342

Plaintiff

vs.

ANTONIO GEATTI
20 Shawnee Road
Scott Twp a/k/a Bloomsburg, PA 17815

Defendant(s)

IN THE COURT OF COMMON PLEAS
OF COLUMBIA COUNTY

NO. 2019-CV-1355

WRIT OF EXECUTION
(MORTGAGE FORECLOSURE)

2019-ED-148

WRIT OF EXECUTION

THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.

COMMONWEALTH OF PENNSYLVANIA:
COUNTY OF COLUMBIA:

TO THE SHERIFF OF COLUMBIA COUNTY, PENNSYLVANIA:

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

PREMISES: 20 Shawnee Road, Scott Twp a/k/a Bloomsburg, PA 17815

AMOUNT DUE \$22,393.49

Interest From 12/27/2019
to the Date of Sheriff's Sale
at per diem rate of \$3.32

(Costs to be added)

Dated: 12/30/2019

Barbara N. Uluwati
Prothonotary, Common Pleas Court
of Columbia County, Pennsylvania

Deputy Stephen Stray

Proth & Clerk of Sev. Courts
My Com. Ex. 1st Monday in 2020

Sheriff

PNC BANK, NATIONAL ASSOCIATION,
Plaintiff,

: IN THE COURT OF COMMON PLEAS
: OF THE 26TH JUDICIAL DISTRICT
: COLUMBIA COUNTY BRANCH

vs.

: CIVIL ACTION

ANTONIO GEATTI,
Defendant.

: NO.: 1355-CV-2019

April 14, 2020

Norton, J.

PROthonotary
2020 APR 14 P 3 51
CLERK OF COURT
COUNTY OF COLUMBIA

OPINION AND ORDER

OPINION

1. BACKGROUND AND FACTS

a. A Complaint in Foreclosure was filed on October 17, 2019. Among other things, at para. 2, Plaintiff alleged that the Defendant's address was "20 Shawnee Road, Scott Twp. a/k/a/ Bloomsburg, PA 17815." It is noted that Scott Township is a second class township/municipality located in Columbia County PA. "Bloomsburg PA 17815" is a Post Office jurisdiction/location for purposes of U.S. Mail which includes the entire municipality of Scott Township Columbia County PA (this jurist resided the vast majority of his life in Scott Township, Columbia County PA and was the Solicitor of Scott Township, Columbia County, PA for nearly 20 years; this information is provided given the present judicial emergency so as to avoid unnecessary hearings on matters of common knowledge).

b. The subject premises are located in Scott Township, Columbia County PA (See: Compl. para. 4; Ex. A). This location is certainly not associated with "COMMONWEALTH OF PA FOR SCOTT TOWNSHIP, 301 Lindsay Rd Scott Township

PA 15106" (an address alleged at para. 3 of the Rule 3129.1 Affidavits filed by the Plaintiff on December 30, 2019 and March 16, 2020), as, it is clear that, given the zip code, the aforementioned address is approximately 4 hours away from Columbia County near Pittsburgh PA. Counsel are encouraged to double check their work so as not to give rise to such errors.

c. Service of the Complaint was alleged to have been made on November 4, 2019 by the Sheriff by "drop serving" the Defendant (who allegedly personally identified himself as such) at his place of employment at "Sykes, 1361 Columbia Blvd., Bloomsburg PA 17815." (See: Sheriff's Return of Service filed on November 6, 2019).

d. The Defendant filed an "Answer to Complaint" on November 25, 2019 (the "Original Answer"). The Defendant did not enter an address on that pleading.

e. The Defendant filed an "Answer to Complaint (2nd Filing, an Updated Version)" on December 2, 2019 (the "Amended Answer"). The Defendant did endorse this pleading with the address of PO Box 4116 Bethlehem PA 18018.

f. A second Sheriff's Return of Service regarding the Complaint was filed on December 11, 2019 stating that the Defendant was not served on December 9, 2019 when a deputy sheriff attempted service upon the Defendant at the Subject Premises.

g. It is noted that there is no expression of a "special appearance" by the Defendant in filing the Original Answer or the Amended Answer, nor did he file preliminary objections to the Complaint. As such, any defect in service of the Complaint is waived. Cinque v. Asare, 401 Pa.Super. 339, 585 A.2d 490 (1990); O'Barto v. Glossers Stores, Inc., 228 Pa.Super. 201, 324 A.2d 474 (1974).

f. Pa.R.C.P. 3129.2(c)(1)(ii) directs service of a Notice of Sale upon a defendant

who has entered an appearance as per Rule 440. Rule 440(a)(2)(i) requires service of secondary process upon an unrepresented party at the address endorsed on a prior pleading. In this case, the Defendant endorsed his address at PO Box 4116 Bethlehem PA 18018 in his Amended Answer. Plaintiff has not complied with Rule 3129.2(c)(1)(ii).

g. On December 30, 2019, despite Defendant filing two Answers, the Plaintiff took default judgment. Even if the Defendant, being pro se and out of ignorance because of that, failed to serve either Answer, it is incumbent upon a Plaintiff to exercise due diligence to search the docket, and to do a bringdown search, before taking default judgment, to ensure that an Answer was not filed before taking default judgment and to ensure that no subsequent lienholders exist. Plaintiff's judgment is defective and should be stricken.

h. On December 30, 2019 and again on March 16, 2020, the Plaintiff filed an "Affidavit Pursuant to Rule 3129.1":

1) Erroneously attesting to the Defendant's address as being at 1361 Columbia Blvd. Bloomsburg PA 17815 when, indeed, he clearly set forth a different address in the Amended Answer;

2) Erroneously attesting that the address of Scott Township Columbia County PA is somewhere 4 hours away in Allegheny County.

i. On March 19, 2020, the Defendant filed a "Motion, Request, Petition to the Court to Void and Strike Out/Off, the Record Affidavit Pursuant to Rule 3129...." (the "Motion"). No certificate of service was filed, therefore, it is not known if Defendant served Plaintiff's counsel (Defendant is hereby admonished: It is required that every filing and every communication with the Court be served by mail upon Plaintiff's

counsel. After this date, this court will not grant the Defendant any flexibility or excuse from this rule on a presumption of a lack of familiarity with rules of court. The Defendant should obtain an attorney). In the Motion, Defendant objects:

- 1) To the Plaintiff's attorney's use of an improper address for him (1361 Columbia Blvd. Bloomsburg PA), noting that even the Plaintiff Bank uses the proper address (PO Box 4116 Bethlehem PA 18018);
- 2) To Plaintiff's attorney's attestation that he has a child support lien against him in favor of Columbia County Domestic Relations Office and the Pa. Dept. of Public Welfare Bureau of Child Support Enforcement, stating that he never has had a child support order against him. First, whether the Defendant has ever had a child support order is not dispositive to this Opinion or the Order that follows, therefore we make no determination in that regard. Second, counsel for Plaintiff is admonished to note that they have signed an affidavit, under penalty of being prosecuted under §4094 of the Crimes Code and, if the information is not true, they may be prosecuted for the same. Therefore, if there is no lien in favor of an entity, Plaintiff's counsel should not attest that there is, and they must exercise due diligence to find out if there is any such lien. This Court will not accept the excuse "Well, we always do it that way" or "We are just being 'careful' ." An affidavit is an affidavit and should not be taken lightly or signed taking the easy way out. Third, Plaintiff's counsel should note that there has been no Pennsylvania Department of Welfare since the Governor's signature of House Bill 993 in 2014.

j. Upon the Writ of Execution issued on December 30, 2019, a Sheriff's Sale is currently scheduled for May 27, 2020.

2. DISCUSSION

As stated above, the Motion deals directly with the two (2) 3219 Affidavits filed by the Plaintiff and moves to strike the same. Due to the obvious defects of record recited above, the Motion shall be granted.

Further, due to the obvious defect in the default judgment, the judgment will be stricken and the Sheriff's Sale presently scheduled for May 27, 2020 shall be cancelled. It is acknowledged that the striking of the judgment is being rendered sua sponte. There is a well known judicial emergency due to the pandemic. This warrants efficient action by the court, especially in regard to patent defects such as the judgment in this case. We have admonished counsel for Plaintiff to exercise due diligence to conduct proper bringdown searches, to proofread their work to make sure that they are not sending notices to Allegheny County on a case dealing with Columbia County¹, to properly conduct docket searches and to ensure that accurate affidavits are filed. We have admonished Defendant to properly serve Plaintiff's counsel with his documentation. If there is an allegation of error in the striking of the judgment, we will entertain a motion for reconsideration.

¹ If this court caught that error, counsel for the Plaintiff should have also caught the error.

ORDER

AND NOW, to wit, on this 14th day of April, 2020, upon review of Defendant's "Motion, Request, Petition to the Court to Void and Strike Out/Off, the Record Affidavit Pursuant to Rule 3129...", filed by the Defendant on March 19, 2020, on the basis of the foregoing Opinion, it is hereby ORDERED as follows:

1. The Rule 3219 Affidavits filed on December 30, 2019 and March 16, 2020 are hereby STRICKEN; and
2. The judgment entered and the Writ of Execution issued on December 30, 2019 are hereby STRICKEN. The Sheriff's Sale scheduled for May 27, 2020 is hereby CANCELLED.

BY THE COURT:



HONORABLE GARY E. NORTON, J.

J.

APPEARANCES:

KML Law Group, P.C.
Suite 5000-BNV Mellon Independence Center
701 Market Street
Philadelphia, PA 19106
Counsel for Plaintiff- Via 1st Class U. S. Mail

Antonio Geatti
P.O. Box 4116
Bethlehem, PA 18018
Pro Se, Defendant- Via 1st Class & Certified Mail

STATE OF PENNSYLVANIA
COUNTY OF COLUMBIA } SS

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

SHERIFF'S SALE
By Virtue of a Writ of Execution (Mortgage Foreclosure)
No. 2019CV1355

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, MARCH 25, 2020
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 objections are filed with the Sheriff's Office prior thereto.

ALL THAT CERTAIN PIECE, PARCEL AND TRACT OF LAND SITUATE IN SCOTT TOWNSHIP, COLUMBIA COUNTY, PENNSYLVANIA, BOUNDED AND DESCRIBED AS FOLLOWS, TO-WIT:

BEGINNING AT THE NORTHWEST CORNER OF SHAWNEE ROAD AND THOMAS STREET, THENCE ALONG THE NORTHERN SIDE OF SHAWNEE ROAD, SOUTH 51 DEGREES 46 MINUTES WEST, 200 FEET TO A CORNER IN LINE OF LOT NO 31, THENCE BY THE SAME, NORTH 38 DEGREES 16 MINUTES WEST, 200 FEET TO A CORNER ON THE SOUTHERN SIDE OF HILLTOP AVENUE; THENCE BY THE SAME, NORTH 51 DEGREES 46 MINUTES EAST, 200 FEET TO A CORNER ON THE WESTERN SIDE OF THOMAS STREET, THENCE BY THE SAME, SOUTH 38 DEGREES 14 MINUTES EAST, 200 FEET TO THE NORTHWEST CORNER OF SHAWNEE ROAD AND THOMAS STREET, THE PLACE OF BEGINNING BEING LOTS NOS. 32 AND 33 IN THE SHAWNEE HEIGHTS ADDITION TO SCOTT TOWNSHIP, THE DESCRIPTION FOR THIS DEED WAS PREPARED FROM DRAFT OF A CARL WOLFE, R.S., DATED JUNE 1, 1956.

BEING KNOWN AS 20 SHAWNEE ROAD, SCOTT TWP A/K/A BLOOMSBURG, PA 17815

PROPERTY ID NUMBER 31-3D2-006

BEING THE SAME PREMISES WHICH KAREN E. LONG, ATTORNEY IN FACT FOR AGENIS E. MARR BY DEED DATED 12/20/2002 AND RECORDED 12/20/2002 IN THE OFFICE OF THE RECORDER OF DEEDS AS INSTRUMENT NO. 200214758, GRANTED AND CONVEYED UNTO ANTONIO GEATTI

PROPERTY ADDRESS 20 SHAWNEE ROAD.

URY/TAX PARCEL NUMBER 31-3D2-006

Seized and taken into execution to be sold as the property of ANTONIO GEATTI in suit of PNC BANK NATIONAL ASSOCIATION.

TERMS OF SALE: MINIMUM PAYMENT AT TIME OF SALE: The greater of ten (10%) percent of the bid price or costs (excluding 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 Sheriff, the proceeds check will be payable to Sheriff, unless the Columbia County Sheriff's Office receives advance written notice otherwise, signed by an authorized representative of the plaintiff.

TIMOTHY T. CHAMBERLAIN, Sheriff
COLUMBIA COUNTY, Pennsylvania

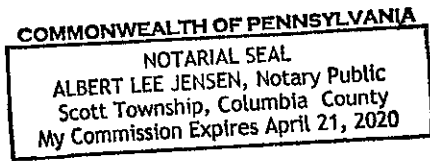
Attorney for the Plaintiff
KIVIL LAW GROUP, P.C.
PHILADELPHIA, PA

Ad Text: GEATTI SALE
Date(s) Published: 3/4/2020, 3/11/2020, 3/18/2020

James T Micklow

Sworn and subscribed to before me
this 19 day of March 2020.

Albert Lee Jensen
(Notary Public)



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

KML LAW GROUP, P.C.

ATTORNEYS AT LAW

SUITE 5000
701 MARKET STREET
PHILADELPHIA, PA 19106
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(215) 627-1322
FAX (215) 825-6456
PASALES@KMLLAWGROUP.COM

March 19, 2020

SHERIFF OF COLUMBIA COUNTY
FAX: 570-389-5625

RE: PNC BANK, NATIONAL ASSOCIATION
vs.
ANTONIO GEATTI
No. 2019-CV-1355
KML File#: 197309FC

Property Address: 20 Shawnee Road, Scott Twp a/k/a Bloomsburg, PA 17815
Sheriff's Sale Date: March 25, 2020
Sale No.

To the Sheriff:

Kindly postpone the above-captioned Sheriff's Sale scheduled for March 25, 2020
to May 27, 2020.

Thank you for your cooperation in this matter.

By: **KML LAW GROUP, P.C.**
Sheriff's Sale Department
Tara Busa – Supervisor
(215) 825-6379
PASALES@KMLLAWGROUP.COM

Attorney Contact: Kevin G. McDonald, Esquire, (215) 825-6311, kmcdonald@kmlawgroup.com

cc:
ANTONIO GEATTI - 1361 Columbia Blvd, Bloomsburg, PA 17815

SHERIFF'S SALE COST SHEET

1355-2019

VS.
 NO. _____ ED NO. _____ JD DATE/TIME OF SALE _____

DOCKET/RETURN	\$15.00	
SERVICE PER DEF.	<u>\$ 195.00</u>	
LEVY (PER PARCEL	\$15.00	
MAILING COSTS	<u>\$ 36.00</u>	
ADVERTISING SALE BILLS & COPIES	\$17.50	
ADVERTISING SALE (NEWSPAPER)	\$15.00	
MILEAGE	<u>\$ 8.00</u>	
POSTING HANDBILL	\$15.00	
CRYING/ADJOURN SALE	\$10.00	
SHERIFF'S DEED	\$35.00	
TRANSFER TAX FORM	\$25.00	
DISTRIBUTION FORM	\$25.00	
COPIES	<u>\$ 6.50</u>	
NOTARY	<u>\$ 10.00</u>	
TOTAL *****		<u>\$ 428.00</u>

WEB POSTING	\$150.00	
PRESS ENTERPRISE INC.	<u>\$ 1523.30</u>	
SOLICITOR'S SERVICES	\$100.00	
TOTAL *****		<u>\$ 1773.30</u>

PROTHONOTARY (NOTARY)	\$10.00	
RECORDER OF DEEDS	<u>\$ 71.75</u>	
TOTAL *****		<u>\$ 81.75</u>

REAL ESTATE TAXES:

BORO, TWP & COUNTY 20		\$ _____	
SCHOOL DIST. 20		\$ _____	
DELINQUENT 20		<u>\$ 6358.88</u>	
TOTAL *****			<u>\$ 6358.88</u>

MUNICIPAL FEES DUE:

SEWER 20		<u>\$ 1041.86</u>	
WATER 20		\$ _____	
TOTAL *****			<u>\$ 1041.86</u>

SURCHARGE FEE (DSTE)		<u>\$ 140.00</u>	
MISC. _____		\$ _____	
_____		\$ _____	
TOTAL *****			<u>\$ -0-</u>

TOTAL COSTS (OPENING BID) \$ 9823.79

KML LAW GROUP, P.C.

ATTORNEYS AT LAW

SUITE 5000
701 MARKET STREET
PHILADELPHIA, PA 19106
WWW.KMLLAWGROUP.COM

March 12, 2020

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

RE: No. 2019-CV-1355
ANTONIO GEATTI
KML File#: 197309FC

To the Real Estate Division:

Please be advised the property in the above case may be sold on March 25, 2020. Service of the Notice of Sale has been completed in accordance with Rule 3129.

Should you need anything else, please contact us and we will provide the same immediately.

Thank you for your cooperation in this matter.

KML Law Group, P.C.,

 X **Winter Dunn**
 Jacqueline McCoy
 Legal Assistant

For questions, please contact:

Cheryl Dilchus
Direct (215) 825-6349
cdilchus@kmlgroup.com

IN THE COURT OF COMMON PLEAS OF COLUMBIA COUNTY

PNC BANK, NATIONAL ASSOCIATION

3232 Newmark Drive
Miamisburg, OH 45342

Plaintiff

vs.

ANTONIO GEATTI

Mortgagor(s) and Record Owner(s)
20 Shawnee Road
Scott Twp a/k/a Bloomsburg, PA 17815

Defendant(s)

CIVIL DIVISION

CIVIL ACTION – LAW

ACTION OF MORTGAGE FORECLOSURE

No.: 2019-CV-1355 / 2019-ED-148

**DOCUMENT: AFFIDAVIT PURSUANT
TO RULE 3129.1**

FILED ON BEHALF OF:

PNC BANK, NATIONAL ASSOCIATION

ATTORNEY FOR PLAINTIFF:

KML Law Group, P.C.

Suite 5000

701 Market Street

Philadelphia, PA 19106

(215) 627-1322

Firm State I.D. #23-217969

3129@kmlawgroup.com

KML LAW GROUP, P.C.
SUITE 5000
701 MARKET STREET
PHILADELPHIA, PA 19106-1532
(215) 627-1322
3129@kmlawgroup.com
ATTORNEY FOR PLAINTIFF

197309FC
Sale Date: 03/25/2020
\$22,393.49

PNC BANK, NATIONAL ASSOCIATION

Plaintiff

vs.

ANTONIO GEATTI

Mortgagor(s) and Record Owner(s)

Defendant(s)

IN THE COURT OF COMMON PLEAS
OF COLUMBIA COUNTY

CIVIL ACTION – LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2019-CV-1355 / 2019-ED-148

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

The undersigned employee of KML Law Group, P.C., counsel for Plaintiff, hereby certifies that service on the Defendants of the Notice of Sheriff Sale was made by:

- Personal Service by the Sheriff's Office/competent adult. Copy of return attached.
- Certified mail by KML Law Group, P.C. Copy of Certified Mail Receipt attached.
- Ordinary mail by KML Law Group, P.C. to Attorney for Defendant(s) of record. Proof of mailing is attached (Pa. R.C.P. 440(a)(1)(i)).
- Acknowledgment of Sheriff's Sale by Attorney for Defendant(s). Proof of acknowledgment attached.

IF SERVICE WAS ACCOMPLISHED BY COURT ORDER.

- Premises was posted by Sheriff's Office/competent adult. Copy of return attached.
- Certified Mail & ordinary mail by KML Law Group, P.C. Copy of Certified Mail Receipt attached.
- Published in accordance with court order. Copy of publication attached.

Service of the Notice of Sale on the lien holders or parties in interest in the attached Affidavit under Pa. R. C. 3129.1, et. seq. has been made by ordinary mail with proof of mailing. KML Law Group, P.C. utilizes a mail process that provides mailing in bulk for various matters over many pages. The first page and last page contain the USPS's postmark. As set forth in the Affidavit, the firm certifies that the notice of sale mail was mailed to the listed lienholders and parties in interest on this date noted on the postmark. The proof of mailing has been redacted to exclude names and addresses of other mail unrelated to this matter.

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

DATED: 03/12/2020

KML Law Group, P.C.

X Winter Dunn

Jacqueline McCoy

Legal Assistant



February 4, 2020

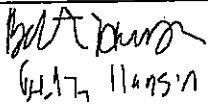
Dear Briana Diaz:

The following is in response to your request for proof of delivery on your item with the tracking number:
7196 9002 4840 6034 4322.

Item Details

Status:	Delivered, Left with Individual
Status Date / Time:	January 27, 2020, 10:25 am
Location:	BLOOMSBURG, PA 17815
Postal Product:	First-Class Mail®
Extra Services:	Certified Mail™ Return Receipt Electronic

Recipient Signature

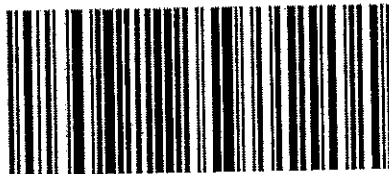
Signature of Recipient:	
Address of Recipient:	1261 Columbia

Note: Scanned image may reflect a different destination address due to intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,
United States Postal Service®
475 L'Enfant Plaza SW
Washington, D.C. 20260-0004

KML Law Group, P.C.
P.O. Box 23159
San Diego, CA 92193-3159



71 96900 2484 0603 4432 2

GEATTI, ANTONIO
1361 Columbia Blvd
Bloomsburg, PA 17815

Mailed On: 1/23/2020 Order Number: 0034025-01
ClientID: KML_Law_000606 ER Reference Number: PA197309



KML Law Group, PC
 701 Market St, Suite 5000
 Philadelphia, PA 19106

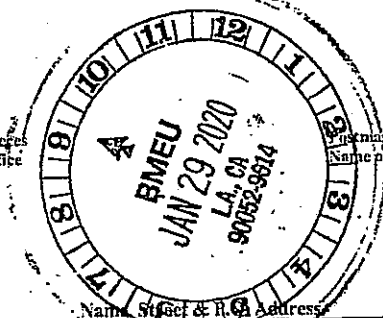
PS form 3665
 Type of Mailing:
CERTIFICATE OF MAILING
 January 29, 2020



List Number of Pieces
 Listed by Sender

237

Total Number of Pieces
 Received at Post office



Postmaster:
 Name of receiving employee

Dated:

Line	Reference	Tracking Number	Name, Street & R.F. Address	Postage	Fee

KML Law Group, PC
701 Market St, Suite 5000
Philadelphia, PA 19106

PS form 3665
Type of Mailing:
CERTIFICATE OF MAILING
January 29, 2020



Line	Reference	Tracking Number	Name, Street & P.O. Address	Postage	Fee
180	499754	2350930729	COMMONWEALTH OF PA FOR SCOTT TOWNSHIP 301 Lindsay Rd Scott Township, PA 15106	\$0.650	\$0.43
182	499759	2350930731	TENANTS/OCCUPANTS 20 Shawnee Road Scott Twp a/k/a Bloomsburg, PA 17815	\$0.650	\$0.43
186	499758	2350930735	PENNSYLVANIA DEPARTMENT OF LABOR & INDUSTRY 651 Boas Street Harrisburg, PA 17121	\$0.650	\$0.43
192	499755	2350930741	DOMESTIC RELATIONS OF COLUMBIA COUNTY PO Box 380 Bloomsburg, PA 17815	\$0.650	\$0.43
193	499757	2350930742	PA DEPARTMENT OF REVENUE BUREAU OF COMPLIANCE P.O. BOX 281230 HARRISBURG, PA 17128-1230	\$0.650	\$0.43

KML Law Group, PC
701 Market St, Suite 5000
Philadelphia, PA 19106

PS form 3665
Type of Mailing:
CERTIFICATE OF MAILING
January 29, 2020



Line	Reference	Tracking Number	Name, Street & P.O. Address	Postage	Fee
210	499756	2350930759	PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement Health and Welfare Bldg. - Room 432 P.O. Box 2675 Harrisburg, PA 17105-2675	\$0.650	\$0.43

KML Law Group, P.C.
SUITE 5000
701 MARKET STREET
PHILADELPHIA, PA 19106-1532
(215) 627-1322
3129@kmlawgroup.com
ATTORNEY FOR PLAINTIFF

PNC BANK, NATIONAL ASSOCIATION
3232 Newmark Drive
Miamisburg, OH 45342

Plaintiff

vs.

ANTONIO GEATTI
Mortgagor(s) and Record Owner(s)
20 Shawnee Road
Scott Twp a/k/a Bloomsburg, PA 17815

Defendant(s)

IN THE COURT OF COMMON PLEAS
OF COLUMBIA COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2019-CV-1355 / 2019-ED-148

AFFIDAVIT PURSUANT TO RULE 3129

PNC BANK, NATIONAL ASSOCIATION, Plaintiff in the above action, by and through an authorized employee of its attorneys, KML Law Group, P.C., sets forth as of the date the praecipe for the writ of execution was filed the following information concerning the real property located at:

20 Shawnee Road
Scott Twp a/k/a Bloomsburg, PA 17815

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

ANTONIO GEATTI
1361 Columbia Blvd
Bloomsburg, PA 17815

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

ANTONIO GEATTI
1361 Columbia Blvd
Bloomsburg, PA 17815

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

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

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

PA DEPARTMENT OF REVENUE
BUREAU OF COMPLIANCE
P.O. BOX 281230
HARRISBURG, PA 17128-1230

PENNSYLVANIA DEPARTMENT OF LABOR & INDUSTRY
651 Boas Street
Harrisburg, PA 17121

COMMONWEALTH OF PA FOR SCOTT TOWNSHIP
301 Lindsay Rd
Scott Township , PA 15106

4. Name and address of the last recorded holder of every mortgage of record:
5. Name and address of every other person who has any record interest in or record lien on the property and whose interest may be affected by the sale:
6. Name and address of every other person of whom the plaintiff has knowledge who has any record interest in the property which may be affected by the sale.
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale.

TENANTS/OCCUPANTS
20 Shawnee Road
Scott Twp a/k/a Bloomsburg, PA 17815

I verify that the statements made in this affidavit are true and correct to the best of my personal knowledge or information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

DATED: 03/12/2020

KML Law Group, P.C.

X Winter Dunn
— Jacqueline McCoy
— Legal Assistant

For inquiries, please contact:

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cdilchus@kmlawgroup.com

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ATTORNEY FOR PLAINTIFF

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Plaintiff

vs.

ANTONIO GEATTI
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Defendant(s)

IN THE COURT OF COMMON PLEAS
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**CERTIFICATION AS TO COMPLIANCE WITH THE PENNSYLVANIA CASE RECORDS
PUBLIC ACCESS POLICY, SECTION 7.0 CONFIDENTIAL INFORMATION**

Plaintiff, by counsel, hereby certifies that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents and that confidential information and documents have been redacted in accordance with controlling privacy statutes and that confidential information is not required by law, ordered by the court or is not otherwise necessary to effect the disposition of this matter.

By: 

KML LAW GROUP, P.C.

Michael McKeever Pa. ID 56129

Lisa Lee Pa. ID 78020

David Fein Pa. ID 82628

Alyk L. Oflazian Pa. ID 312912

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Brooke R. Waisbord Pa. ID 326432

Attorneys for Plaintiff

SHERIFF'S OFFICE OF COLUMBIA COUNTY

Timothy T. Chamberlain
Sheriff

Earl D. Mordan, Jr.
Chief Deputy



PNC BANK NATIONAL ASSOCIATION
vs.
ANTONIO GEATTI

Case Number
2019CV1355

SHERIFF'S RETURN OF SERVICE

02/20/2020 08:14 AM - DEPUTY KRISTIE ROSPENDOWSKI, BEING DULY SWORN ACCORDING TO LAW, STATES SERVICE WAS PERFORMED BY POSTING A TRUE COPY OF THE REQUESTED HANDBILL UPON THE REAL ESTATE LOCATED AT 20 SHAWNEE ROAD, BLOOMSBURG, PA 17815.


KRISTIE ROSPENDOWSKI, DEPUTY

SO ANSWERS,


TIMOTHY T. CHAMBERLAIN, SHERIFF

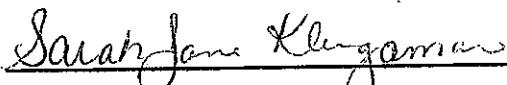
February 21, 2020

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
SARAH JANE KLINGAMAN, NOTARY PUBLIC
TOWN OF BLOOMSBURG, COLUMBIA COUNTY
MY COMMISSION EXPIRES OCT. 4, 2020.

NOTARY

Affirmed and subscribed to before me this

21ST day of FEBRUARY, 2020



Plaintiff Attorney: KML LAW GROUP, P.C., 701 MARKET STREET, PHILADELPHIA, PA 19106