

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

**COLUMBIA COUNTY
SHERIFF'S OFFICE**

Fax

To: Robert J. Murtaugh, Esq. **From:** Chief Deputy T. Chamberlain
Fax: **Date:** October 23, 2002
Phone: **Pages:** 1
Re: eviction **CC:**

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

•Comments: The eviction for Gary Evans and Sheri Steimling has been scheduled for November 1, 2002 at 1:00 pm.

**Harvey, Pennington, Cabot,
Griffith & Renneisen LTD.**

ATTORNEYS AT LAW
Eleven Penn Center
1835 Market Street
29th Floor
Philadelphia, PA 19103-2969
215 563-4470
Fax: 215 568-1044
www.harvpenn.com

FAX COVER SHEET

To: Columbia County Sheriff
Eviction Department

Fax #: (570) 389-5625

From: Robert J. Murtaugh, Esquire

Date: October 22, 2002

Pages: 2

Client/matter: 67750.01008

Comments: Re: Chase Manhattan Bank v. Evans & Steimling;
Columbia County C.C.P. No. 2002-CV-795

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11/1/1300

HARVEY, PENNINGTON, CABOT, GRIFFITH & RENNEISEN, LTD.

ATTORNEYS AT LAW

Robert J. Murtaugh, Esquire
direct dial: (215) 576-4150

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October 23, 2002

Via Facsimile (570) 389-5625

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

Re: Chase Manhattan Mortgage Corporation v. Gary A. Evans and Sheri L. Steimling
Property Address: 25 East Lake Glory Road, Catawissa, PA 17820
Property: 1998 Fleetwood 28' x 64' Mobile Home, VIN: PAFLT22AB093770K13
Columbia County C.C.P. No. 2002-CV-795
HPCG&R File No. 67750.01008

Dear Sir/Madam:

Please be advised that our office represents Plaintiff, Chase Manhattan Mortgage Corporation in connection with the above matter.

On September 24, 2002, our office forwarded a letter requesting the eviction date be postponed as the Debtors were trying to make arrangements to bring current. Debtors are unable to reconcile their account and Chase has requested we move forward with the eviction. At your earliest convenience, kindly contact the undersigned with a new eviction date so that Chase can provide a bonded locksmith to be present for the eviction.

Thank you in advance for your courtesy and cooperation in this matter.

Very truly yours,



For: Robert J. Murtaugh, Esquire
For: HARVEY, PENNINGTON, CABOT,
GRIFFITH & RENNEISEN, LTD.

RJM/amm
Enclosures

**Harvey, Pennington, Cabot,
Griffith & Renneisen LTD.**

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FAX COVER SHEET



To: Wendy
Sheriff of Columbia County

Fax #: (570) 389-5625

From: Adrienne McClinton, Paralegal
Robert J. Murtaugh, Esquire

Date: September 24, 2002

Pages: 2

Client/matter: 67750.01008

Comments: Re: Chase v. Evans & Steimling; Docket No. 2002-CV-795 (Docket No. As appears on your Affidavits of Service - 113-ED-2002).

As per our conversation, enclosed please find a letter requesting the eviction date of October 1, 2002 be postponed. Thank you - Adrienne.

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HARVEY, PENNINGTON, CABOT, GRIFFITH & RENNEISEN, LTD.

ATTORNEYS AT LAW

Robert J. Murtaugh, Esquire
direct dial: (215) 575-4150

Eleven Penn Center
29th Floor
1835 Market Street
Philadelphia, PA 19103-2989
(215) 563-4470
Fax: (215) 566-1044
www.harvpenn.com

September 24, 2002

Via Facsimile (570) 389-5625

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

Re: Chase Manhattan Mortgage Corporation v. Gary A. Evans and Sheri L. Steimling
Property Address: 25 East Lake Glory Road, Catawissa, PA 17820
Property: 1998 Fleetwood 28' x 64' Mobile Home, VIN: PAFLT22AB093770K13
Columbia County C.C.P. No. 2002-CV-795
HPCG&R File No. 67750.01008

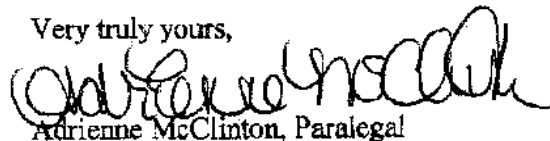
Dear Sir/Madam:

Please be advised that our office represents Plaintiff, Chase Manhattan Mortgage Corporation in connection with the above matter.

Our office has received the Sheriff's Affidavits for service of the Writ of Possession upon the Defendants. The Affidavits indicate that the Defendants of the Mobile Home will be evicted on October 1, 2002 at 10:00 a.m. At this time, I request that the eviction date be postponed until sometime after October 10, 2002, as Chase and the Defendants are attempting to reach an amicable solution to the outstanding debt. At your earliest convenience, kindly contact the undersigned (215-563-4470, ext. 4232) with a new eviction date.

Thank you in advance for your courtesy and cooperation in this matter.

Very truly yours,



Adrienne McClinton, Paralegal

For: Robert J. Murtaugh, Esquire

For: HARVEY, PENNINGTON, CABOT,
GRIFFITH & RENNEISEN, LTD.

RJM/amm
Enclosures

Bryn Mawr, PA Cherry Hill, NJ New York, NY Pittsburgh, PA San Francisco, CA Wilmington, DE

HARRY A. ROADARMEL, JR.



SHERIFF OF COLUMBIA COUNTY
COURT HOUSE - P.O. BOX 380
BLOOMSBURG, PA 17815
FAX: (570) 784-0257

PHONE
(570) 389-5622

24 HOUR PHONE
(570) 784-6300

CHASE MANHATTAN MORTGAGE CORP. Docket # 113ED2002

VS

WRIT OF POSSESSION

GARY EVANS
SHERI STEIMLING

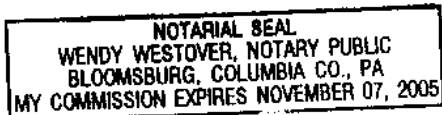
AFFIDAVIT OF SERVICE

NOW, THIS MONDAY, SEPTEMBER 16, 2002, AT 12:12 PM, SERVED THE WITHIN WRIT OF POSSESSION UPON SHERI STEIMLING AT 25 EAST LAKE GLORY ROAD, CATAWISSA BY HANDING TO SHERI STEIMLING, , A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT AND MADE KNOWN TO HER THE CONTENTS THEREOF. EVICTION IS OCTOBER 1, 2002 AT 10:00 AM.

SO ANSWERS,

SWORN AND SUBSCRIBED BEFORE ME
THIS THURSDAY, SEPTEMBER 19, 2002

Wendy Westover
NOTARY PUBLIC



Harry A. Roadarmel Jr.

X
SHERIFF HARRY A. ROADARMEL JR.

T. Chamberlain
X
T. CHAMBERLAIN
CHIEF DEPUTY SHERIFF

COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN
DATE RECEIVED 9/13/2002

SERVICE# 1 - OF - 2 SERVICES
DOCKET # 113FD2002

PLAINTIFF CHASE MANHATTAN MORTGAGE CORP.
DEFENDANT GARY EVANS
SHERI STEIMLING

PERSON/CORP TO SERVED
GARY EVANS
25 EAST LAKE GLORY ROAD
CATAWISSA

PAPERS TO SERVED
WRIT OF POSSESSION

SERVED UPON Sheri

RELATIONSHIP AFC IDENTIFICATION _____

DATE 9-16-02 TIME 1212 MILEAGE _____ OTHER _____

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

- TYPE OF SERVICE: A. PERSONAL SERVICE AT POA ___ POB ___ POE ___ CCSO ___
 B. HOUSEHOLD MEMBER: 18+ YEARS OF AGE AT POA
 C. CORPORATION MANAGING AGENT
 D. REGISTERED AGENT
 E. NOT FOUND AT PLACE OF ATTEMPTED SERVICE

F. OTHER (SPECIFY) _____

16-1
1000

ATTEMPTS	DATE	TIME	OFFICER	REMARKS
1	<u>9-16</u>	<u>1212</u>	<u>TC</u>	<u>16</u>

DEPUTY TC DATE _____

COLUMBIA COUNTY SHERIFF'S OFFICE PROCESS SERVICE ORDER

OFFICER: T. CHAMBERLAIN
DATE RECEIVED 9/13/2002

SERVICE# 2 - OF - 2 SERVICES
DOCKET # 113ED2002

PLAINTIFF CHASE MANHATTAN MORTGAGE CORP.
DEFENDANT GARY EVANS
SHERI STEIMLING

PERSON/CORP TO SERVED
SHERI STEIMLING
25 EAST LAKE GLORY ROAD
CATAWISSA

PAPERS TO SERVED
WRIT OF POSSESSION

SERVED UPON Sheri

RELATIONSHIP _____ IDENTIFICATION _____

DATE 9-18-02 TIME 1212 MILEAGE _____ OTHER _____

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

- TYPE OF SERVICE: A. PERSONAL SERVICE AT POA ___ POB ___ POE ___ CCSO ___
B. HOUSEHOLD MEMBER: 18+ YEARS OF AGE AT POA
C. CORPORATION MANAGING AGENT
D. REGISTERED AGENT
E. NOT FOUND AT PLACE OF ATTEMPTED SERVICE

F. OTHER (SPECIFY) _____

ATTEMPTS DATE	TIME	OFFICER	REMARKS
<u>9-16</u>	<u>1010</u>		<u>lc</u>

DEPUTY TC DATE _____

HARVEY, PENNINGTON, CABOT, GRIFFITH & RENNEISEN, LTD.

ATTORNEYS AT LAW

Robert J. Murtaugh, Esquire
direct dial: (215) 575-4150

Eleven Penn Center
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www.harvpenn.com

September 9, 2002

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

Re: Chase Manhattan Mortgage Corporation v. Gary A. Evans and
Sheri L. Steimling
Columbia County C.C.P. No. 2002-CV-795
HPCG&R File No. 67750.01008

Dear Sir/Madam:

Enclosed please find two (2) time stamped copies of a Writ of Possession and a check in the amount of \$100.00 for Sheriff's service fees in connection with the above matter. Kindly serve both copies of the Writ upon the Defendants, Gary A. Evans and Sheri L. Steimling at 25 East Lake Glory Road, Catawissa, Pennsylvania 17820 and return the Affidavit of Service to the undersigned in the envelope provided.

Also, kindly contact our office with a date and time to have the Defendants evicted from the Property so that we may schedule a locksmith to be present.

Very truly yours,



Robert J. Murtaugh, Esquire
For: HARVEY, PENNINGTON, CABOT,
GRIFFITH & RENNEISEN, LTD.

RJM/amm
Enclosures

HARVEY, PENNINGTON, CABOT, GRIFFITH & RENNEISEN, LTD.
Robert J. Murtaugh, Esquire
Pa. ID No. 57494
Eleven Pcnm Center, 29th Floor
1835 Market Street
Philadelphia, PA 19103
Telephone: (215) 563-4470
Telecopier: (215) 568-1044
Attorneys for Plaintiff, Chase Manhattan Mortgage Corp.

CHASE MANHATTAN MORTGAGE CORP. : IN THE COURT OF COMMON PLEAS
c/o Fidelity National Foreclosure Solutions : COLUMBIA COUNTY, PA
1270 Northland Drive, Suite 200 : COMPLAINT IN REPLEVIN
Mendota Heights, MN 55120 :
: CIVIL ACTION - LAW

Plaintiff(s)

v.

Docket No. 2002-CV-795

GARY A. EVANS
25 East Lake Glory Road
Catawissa, PA 17820

AND

SHERI L. STEIMLING
25 East Lake Glory Road
Catawissa, PA 17820

Defendant(s)

CLERK OF COURTS OFFICE
COLUMBIA COUNTY, PA

2002 SEP 12 A 10:39

FILED
PROTHONOTARY

2002-ED-113

PRAECIPE FOR WRIT OF POSSESSION

TO THE PROTHONOTARY:

Issue writ of possession in the above matter.

**HARVEY, PENNINGTON, CABOT,
GRIFFITH & RENNEISEN, LTD.**

Dated: September 12, 2002

By: 

Robert J. Murtaugh, Esquire
Attorneys for Plaintiff, Chase Manhattan
Mortgage Corp.

HARVEY, PENNINGTON, CABOT, GRIFFITH & RENNEISEN, LTD.
 Robert J. Murtaugh, Esquire
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 Eleven Penn Center, 29th Floor
 1835 Market Street
 Philadelphia, PA 19103
 Telephone: (215) 563-4470
 Telecopier: (215) 568-1044
 Attorneys for Plaintiff, Chase Manhattan Mortgage Corp.

CHASE MANHATTAN MORTGAGE CORP.	:	IN THE COURT OF COMMON PLEAS
c/o Fidelity National Foreclosure Solutions	:	COLUMBIA COUNTY, PA
1270 Northland Drive, Suite 200	:	COMPLAINT IN REPLEVIN
Mendota Heights, MN 55120	:	
	:	CIVIL ACTION - LAW
	:	
Plaintiff(s)	:	
v.	:	Docket No. 2002-CV-795
	:	
GARY A. EVANS	:	
25 East Lake Glory Road	:	
Catawissa, PA 17820	:	
AND	:	
SHERI L. STEIMLING	:	
25 East Lake Glory Road	:	
Catawissa, PA 17820	:	
Defendant(s)	:	
	:	<i>2002-ED-113</i>

WRIT OF POSSESSION

COMMONWEALTH OF PENNSYLVANIA	:	
	:	SS.
COUNTY OF COLUMBIA	:	

To the Sheriff of Columbia County:

(1) To satisfy the judgment in replevin in the above matter you are directed to deliver possession of the following described property to **CHASE MANHATTAN MORTGAGE CORP.:**

A 1998 Fleetwood 28' x 64' Mobile Home, VIN: PAFLT22AB093770K13, located at 25 East Lake Glory Road, Catawissa, Pennsylvania 17820.

(2) To satisfy the costs against _____ you are directed to levy upon any property of _____ and sell his or her interest therein.

Tanni B. Kline
PROTHONOTARY

Date: 9/13, 2002
Seal of the Court

By: Elizabeth A. Bernan
Deputy

HARVEY, PENNINGTON, CABOT, GRIFFITH & RENNEISEN, LTD
CLIENT DISBURSEMENT ACCOUNT
ELEVEN PENN CENTER PLAZA
1835 MARKET STREET, 29TH FLOOR
PHILADELPHIA, PA 19103

PNC Bank 3-5/310
Philadelphia, PA

Check No. 637066
September 9, 2002

ONE HUNDRED AND 00/100 DOLLARS
Pay to the order of:

*****\$100.00

COLUMBIA COUNTY SHERIFF
P.O. BOX 380
BLOOMSBURG, PA 17815

James Caldwell

⑈ 637066 ⑈ ⑆ 031000053⑆ ⑈ 8558268619 ⑈