

MARTHA E. VON ROSENSTIEL, P.C.
Martha E. Von Rosenstiel, Esq / No 52634
Heather Riloff, Esq / No 309906
Tyler J. Wilk, Esq / No 322247
649 South Ave, Ste 7
Secane, PA 19018
(610)328-2887
Attorneys for Plaintiff

LAKE MICHIGAN	:	COURT OF COMMON PLEAS
	:	MONTGOMERY COUNTY
Plaintiff	:	
	:	
VS.	:	
	:	No: 2017-16329
DENISE M. COSTEA, A/K/A DENISE COSTEA	:	
	:	
Defendants	:	

BRIEF IN SUPPORT OF ITS MOTION FOR SPECIAL SERVICE

Movant, by its counsel, Martha E. Von Rosenstiel, P.C., moves this Honorable Court for an Order directing service of the Notice of Sale and all subsequent notices upon the above captioned defendant by regular mail and certified mail and by posting of the premises located at 451 North Sterling Road, Block 5 Unit 23 Elkins Park, PA 19027 (hereinafter "Subject Premises") and in support thereof avers the following:

I. FACTS

The Plaintiff filed its Complaint in Mortgage Foreclosure against Denise M. Costea, A/K/A Denise Costea on or about June 19, 2017, for Denise M. Costea, A/K/A Denise Costea's failure to make monthly mortgage payments due November 01, 2016. On or about September 15, 2017 judgment was entered against Denise M. Costea, A/K/A Denise Costea and in favor of the Lake Michigan. On or about September 15, 2017, a writ of execution was issued listing the