

**CIVIL ACTION  
COURT OF COMMON  
PLEAS  
ALLEGHENY COUNTY, PA  
CIVIL ACTION-LAW  
NO. GD-23-011657  
NOTICE OF ACTION IN  
MORTGAGE  
FORECLOSURE  
PHH MORTGAGE  
CORPORATION, Plaintiff**

v.

DAWN WRIGHT A/K/A DAWN  
A. WRIGHT, IN HER CAPACITY  
AS ADMINISTRATRIX AND  
HEIR OF THE ESTATE OF JOE C.  
TAYLOR A/K/A JOE  
CLEVELAND TAYLOR; ET AL.  
Defendants

To: UNKNOWN HEIRS,  
SUCCESSORS, ASSIGNS AND  
ALL PERSONS, FIRMS, OR  
ASSOCIATIONS CLAIMING  
RIGHT, TITLE, OR INTEREST  
FROM OR UNDER JOE C.

TAYLOR A/K/A JOE  
CLEVELAND TAYLOR  
Defendant(s), 131 S JOSLYN  
DR PENN HILLS, PA 15235

**COMPLAINT IN MORTGAGE  
FORECLOSURE**

You are hereby notified that  
Plaintiff, PHH MORTGAGE  
CORPORATION, has filed a  
Mortgage Foreclosure  
Complaint endorsed with a  
Notice to Defend, against you  
in the Court of Common Pleas  
of ALLEGHENY County, PA  
docketed to No.

GD-23-011657, seeking to  
foreclose the mortgage  
secured on your property  
located, 131 S JOSLYN DR  
PENN HILLS, PA 15235.

**NOTICE**

YOU HAVE BEEN SUED IN  
COURT. If you wish to defend  
against the claims set forth in  
this notice you must take  
action within twenty (20) days  
after the Complaint and  
Notice are served, by entering  
a written appearance  
personally or by attorney and  
filing in writing with the Court  
your defenses or objections to  
the claims set forth against  
you. You are warned that if  
you fail to do so, the case may  
proceed without you, and a  
judgment may be entered  
against you by the Court  
without further notice for any  
money claimed in the  
Complaint or for any other  
claim or relief requested by  
the plaintiff. You may lose  
money or property or other  
rights important to you. YOU  
SHOULD TAKE THIS PAPER TO  
YOUR LAWYER AT ONCE. IF  
YOU DO NOT HAVE A  
LAWYER, GO TO OR  
TELEPHONE THE OFFICE SET  
FORTH BELOW. THIS OFFICE  
CAN PROVIDE YOU WITH  
INFORMATION ABOUT HIRING  
A LAWYER.

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

Lawyer Referral Service  
Allegheny County Bar  
Association  
400 Koppers Building  
436 Seventh  
Avenue Pittsburgh PA, 15219  
412-261-5555

Robertson, Anschutz, Schneid,  
Crane & Partners, PLLC  
A Florida professional limited  
liability company

ATTORNEYS FOR PLAINTIFF  
Troy Freedman, Esq. ID No.  
85165  
133 Gaither Drive, Suite F  
Mt. Laurel, NJ 08054  
855-225-6906