

DOCKET NO. 173

NUMBER	TERM	YEAR
338	November	1960

Dahr A. Dodge

VERSUS

Kathleen M. Dodge

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DAHR A. DODGE,	:	
Plaintiff	:	
	:	
-vs-	:	No. 338 NOVEMBER TERM, 1960
	:	
KATHLEEN M. DODGE,	:	IN REPLEVIN
Defendant	:	

ANSWER IN REPLEVIN

And now comes KATHLEEN M. DODGE and by her attorneys, Gleason, Cherry & Cherry, files this answer to the complaint in the above entitled matter:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied, and on the contrary it is averred said articles of personal property set forth in Plaintiff's Exhibit "A" are the sole property of the Defendant, KATHLEEN M. DODGE. It is further averred that said articles are not of the value of \$1,000.00 and on the contrary it is averred that said value does not exceed \$500.00.
5. Denied, and on the contrary it is averred that said personal property listed in the Plaintiff's Exhibit "A" is now and has been the sole property of the Defendant, KATHLEEN M. DODGE.
6. Denied, and on the contrary it is averred that said articles listed in Plaintiff's Exhibit "A" is now and has been the sole property of the Defendant, KATHLEEN M. DODGE.
7. Admitted.
8. Admitted, but it is further averred, however, that Plaintiff had no authority to so lease, sell or pledge said items

as said items are now and have been the sole property of the Defendant, KATHLEEN M. DODGE.

9. Denied, and on the contrary it is averred that said personal property listed in Plaintiff's Exhibit "A" is now and has been the sole property of the Defendant, KATHLEEN M. DODGE.

WHEREFORE, KATHLEEN M. DODGE requests judgment be entered in her favor.

GLEASON, CHERRY & CHERRY

By

Anthony S. Guido

Attorneys for Defendant

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

Personally appeared before the undersigned, a Notary Public,
in and for the County and State aforesaid, KATHLEEN M. DODGE,
who, being duly sworn according to law, deposes and says that the
facts set forth in the foregoing Answer In Replevin are true and
correct to the best of her knowledge, information and belief.

Kathleen M. Dodge

Sworn to and subscribed before me this 25th day of
January, 1961.

Joseph L. Cherry
Notary Public
My Commission expires Jan. 7, 1963.

9/2/61

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY, PENNA.
No. 338 NOVEMBER TERM, 1960
IN REPLEVIN

DAHR A. DODGE,
Plaintiff

-VS-

KATHLEEN M. DODGE,
Defendant

ANSWER IN REPLEVIN

TO THE WITHIN NAMED PLAINTIFF:

You are hereby notified
to plead to the enclosed
Answer within twenty (20) days
from service hereof.

GLEASON, CHERRY & CHERRY
By *William T. Hagerty*
Attorneys for Defendant

FILED

JAN 26 1961

WM. T. HAGERTY
PROTHONOTARY

GLEASON, CHERRY & CHERRY
7-10 DAMUS BUILDING
DU BOIS, PENNSYLVANIA
109 N. BRADY STREET

*Copy 7 with answer
for plaintiff 2/2/61*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DAHR A. DODGE,
Plaintiff

-vs-

KATHLEEN M. DODGE,
Defendant

:
:
:
:
:
:
:

No. 338 NOVEMBER TERM, 1960

IN REPLEVIN

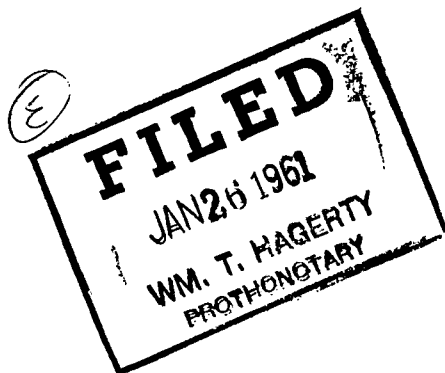
TO WILLIAM T. HAGERTY, PROTHONOTARY:

SIR, enter our appearance for KATHLEEN M. DODGE, Defendant in the
above entitled case.

GLEASON, CHERRY & CHERRY

By

Anthony S. Guida
Attorneys for Defendant



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DAHR A. DODGE

vs

KATHLEEN M. DODGE

:
: No. 338 November Term, 1960
:
: IN REPLEVIN
:

COMPLAINT IN REPLEVIN

NOW COMES, the Plaintiff, DAHR A. DODGE, by his attorney,
and complains of KATHLEEN M. DODGE, the Defendant, as follows:

1. The Plaintiff, DAHR A. DODGE, is a resident of Bailey
Road, Curwensville, Pennsylvania.

2. The Defendant, KATHLEEN M. DODGE, is a resident of 115
Spring Avenue, City of DuBois, Clearfield County, Pennsylvania.

3. The Plaintiff and the Defendant were formerly husband
and wife and the said marriage has been dissolved by divorce
proceedings filed to No. 662 February Term, 1959.

4. The Plaintiff, Dahr A. Dodge, is the sole owner of the
articles of personal property set forth in detail in Plaintiff's
Exhibit "A", valued at \$1,000.00.

5. That the said personal property listed in Plaintiff's
Exhibit "A" was purchased and paid for by the Plaintiff and was
his individual property.

6/ That by sundry and divers transactions, said articles
and items included in Plaintiff's Exhibit "A" were removed by
the Defendant, Kathleen M. Dodge, during the months of September
and October, 1958, from the residence of the Plaintiff, without
his knowledge and consent and contrary to the Order of Court and
are presently located with the Defendant at her residence as
aforesaid.

7. That the Plaintiff has made demands on the Defendant for possession of the said items listed in Plaintiff's Exhibit "A" and the said Defendant has refused to give up possession of the same.

8. That the Plaintiff did not or has not leased, sold or pledged the said items listed in Plaintiff's Exhibit "A" prior to the removal from his residence or subsequently thereafter.

9. That the title and right of possession to the said items listed in Plaintiff's Exhibit "A" was in the Plaintiff at the time of their removal in September or October, 1958 and still remains in the Plaintiff.

WHEREFORE the Plaintiff avers that the title to the said chattels and items listed in the said Complaint still remain in the Plaintiff and as such, he is lawfully entitled to possession of the same.

Paul A. Dodge

EXHIBIT "A"

LIVING ROOM

- 1 Picture
- 1 television set with stand
- 1 overstuffed chair
- 2 pair curtains
- 10 extra pair of curtains

BEDROOM

- 1 bed, mattress & springs
- 1 9x12 rug (red)
- 4 pair curtains
- lot of bed clothing, spreads and blankets
- lot of linens
- 1 wash stand

HALL

- 1 studio couch (blue)
- 1 electric sweeper

CELLAR

- 1 Maytag washing machine
- 12 pants hangers or stretchers
- canned goods

KITCHEN

- 1 12 foot refrigerator with freezer on top
- 1 table
- 4 chairs
- 1 Mix-master
- 1 Toastmaster Toaster
- 1 Electric Coffee pot
- 1 Metal stand
- 1 Electric Iron
- 1 Metal Ironing board
- Lot of cooking utensils

DINING ROOM

- 1 China cupboard
- lot of china dishes
- 1 set silverware
- 1 Sewing Machine (White)
- 2 set curtains

STATE OF PENNSYLVANIA :
 : SS:
COUNTY OF CLEARFIELD :

DAHR A. DODGE, being sworn according to law,
deposes and says that the facts set forth in the foregoing
Complaint are true and correct to the best of his knowledge,
information and belief.

Paul Stodge

Sworn to and subscribed
before me this 29th day
of Nov. 1960.

Don T. Hagerty PROTHO

PROTHONOTARY
My Commission Expires
1st Monday Jan. 1962

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD, COUNTY, PENN.A.
No. 33 November Term, 1960
IN REPLEVIN

DAHR A. DODGE

VS

KATHLEEN M DODGE

COMPLAINT IN REPLEVIN

TO WITHIN NAMED DEFENDANT:

You are hereby notified
to plead to the enclosed
Complaint within twenty (20)
days from the service here-
of.

JOHN B. GATES
Attorney for Plaintiff

By J. B. Gates

FILED
JAN - 4 1961
JOHN TBH GATES BY
PROTHONOTARY
CLEARFIELD CO. PA

4.50 By atty

Affidavit of Service

Dahr A. Dodge

vs.

Kathleen M. Dodge

No. 338 November Term, 19 60

Complaint In Replevin

Returnable within _____ days
from date of service hereof.

NOW January 12, 19 61 at 4:55 o'clock P.M.

served the within Complaint In Replevin

on Kathleen M. Dodge

at place of employment 28 N. Brady Street, DuBois, Pa.

by handing to her personally

a true and attested copy of the original Complaint In Replevin and made

known to her the contents thereof.

Sworn to before me this 13th

day of January A. D. 19 61

Wm. T. Hagerty
Prothonotary

Costs. Sheriff Ammerman \$11.60
(Paid by Atty Gates)

So answers,

Charles G. Ammerman
CHARLES G. AMMERMAN
PROTHONOTARY Sheriff

