

00-1350-CD
DOROTHY E. LANG ROOT -vs- NELLIE ROOT SCHRAND et al

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff

VS.

NO. 00-1350 -CD

NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,

Defendants

ACTION TO QUIET TITLE

CASE NUMBER: 00-CD

TYPE OF CASE: Quiet Title Action

TYPE OF PLEADING: COMPLAINT

FILED ON BEHALF OF: Plaintiff

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQUIRE
Supreme Court I.D. No. 26540
215 East Locust Street
Clearfield, PA 16830
(814) 765-1581

FILED

NOV 01 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff

VS.

NO. 00-
-CD

NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,

Defendants

ACTION TO QUIET TITLE

NOTICE

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this 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 Plaintiffs. 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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

COURT ADMINISTRATOR'S OFFICE
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641 Ext. 50-51

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff

VS.

NO. 00- -CD

NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,

ACTION TO QUIET TITLE

Defendants

COMPLAINT

AND NOW, comes DOROTHY E. LANG ROOT, by and through her
attorney, R. DENNING GEARHART, who avers as follows:

1. That Plaintiff is DOROTHY E. LANG ROOT, a widow, with an address of
2. That Defendant, NELLIE ROOT SCHRAND, is an adult individual, with a last known address of 400 N. Erie Street, Bay City, Michigan.
3. That Defendant, BLODWREN SHRAND HUBER, is an adult individual, with a last known address of 3250 Cross KeyDr. #5, Florissant, Missouri 63033.
4. That Defendant, JANE SCHRAND, is an adult individual, with a last known address of Bay City, Michigan.
5. That the property in question is more particularly described below and has the Tax Map No. 11-H16-350-00012:

ALL those three certain piece or parcel of land situate in the tonwship of Beccaria, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING at a stone corner of the grantor and H.L. McCoy and on line of S.C. Shoff; thence by the H.L. McCoy line North five degrees (5) East seventy-three (73) rods to a Cherry corner; thence by land of the grantor, South eighty-six degrees and thirty minutes East seventy-two and two tenths (72.2) rods to a sugar; thence by land of the Grantor, South sixty-five degrees (65) East thirty-one and two tenths (31.2) rods to a post on the right of way of Public Road leading from Beccaria to Madera; thence by said right of way South twelve degrees and thirty minutes West six and four tenths (6.4) rods; thence by the same South twelve degrees and thirty minutes East twenty-two and six tenths (22.6) rods; thence by the same South four degrees (4) fourteen (14) rods; thence by the same South twenty degrees and thirty minutes West twenty-two and eight tenths (22.8) rods to a post; thence by line of S.C. Shoff North eighty-five degree (85) West ninety-nine and four tenths (99.4) rods to the place of beginning, containing forty-five acres and fifty-four perches neat measure.

5. That said property was purchased by J.C. Root by Deed from R.P. Root and Mary M., husband and wife, dated September 12, 1913 and entered for record in the Recorder's Office of Clearfield County to Deed Book Volume 196, Page 275.

6. That said J.C. Root died January 19, 1941. An estate was opened to Estate File No. 17601 with the Register of Wills Office of Clearfield County, Pennsylvania on January 28, 1941.

7. There were four children born to J.C. and Rhoda Jane Root, his wife, namely, Nellie Root, Harvey L. Root, J. Russell Root and Lloyd D. Root.

8. That Rhoda Jane Root is believed to have passed away in 1918, leaving to survive her her husband, J.C. Root and the above named four children.

9. That according to the Last Will & Testament of J.C. Root, the rest, residue and remainder of his estate is given devised unto his three remaining children, Harvey J. Root, J. Russell Root and Nellie P. Schrand.

10. That Nellie Root married Charles Schrand who she then divorced. There were two children born of this marriage, namely, Blowdyn Schrand and Jane Schrand.

11. Jane Schrand is believed to have passed away in 1947 leaving no spouse, nor issue.

12. That Harvey L. Root is known to have passed away October 17, 1947 leaving no spouse, nor issue. In accordance with intestate succession, the property passes in equal shares to his surviving siblings, J. Russell Root and Nellie Schrand.

13. J. Russell Root married Blodwen Williams, both whom have since passed away. They parented one child, namely, John Lloyd Root.

14. John Lloyd Root married Dorothy Lang. John Lloyd Root passed away August 13, 1995 with title thereby vesting in his surviving spouse, Dorothy Lang Root. They parented two children, namely, Richard L. Root and David J. Root.

15. Lloyd D. Root is known to have passed away, predeceasing his father, J.C. Root.

16. That with respect to this property, Plaintiff and her predecessors in title have exercised open, notorious and continuous dominion possession and control over the premises described in Paragraph 5 for a period in excess of 21 years adverse to any other claims of ownership.

17. That with respect to this property, Plaintiff and her predecessors in title believed this was conveyed to her and as a result of that belief, she has maintained it by paying taxes thereon.

18. That the purpose of this Quiet Title Action is to extinguish and cure any defects which may exist in the ownership of property more particularly described in Paragraph 5 hereof, and to extinguish any equity which the Defendants, their heirs, successors and assigns may have in the premises described in Paragraph 5 hereof.

19. That the Defendant, her heirs, successors and assigns identified in Paragraph 2, 3 and 4 of this Complaint are the only persons or entity known to Plaintiff who have any interest in said property and the Defendants, their heirs, successors and assigns cannot be determined if he/they continue(s) to exist. All the public records in the Clearfield County Courthouse and local telephone books have been checked prior to reaching this conclusion.

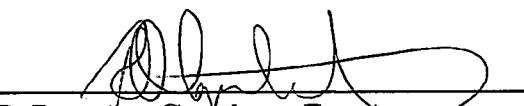
WHEREFORE, Plaintiffs request:

A. that by decree of your Honorable Court it be declared that title to the premises set forth in Paragraph 5 is in the Plaintiff and that she be allowed to enjoy said property in peace;

B. that the Defendants, their heirs, successors and assigns, within thirty (30) days from the receipt of this Complaint, institute an action of ejectment against the Plaintiff and that otherwise the Defendants, their heirs, successors and assigns be perpetually enjoined from setting up any title to said property from impeaching, denying or in any way attaching the Plaintiff's title to said property, from issuing or maintaining an ejectment from said premises and from encumbering, mortgaging or conveying the said premises or any part thereof.

C. such other relief as the court determines to be equitable and just.

Respectfully submitted,


R. Denning Gearhart, Esquire
Attorney for Plaintiff

COMMONWEALTH OF PENNSYLVANIA

: SS:

COUNTY OF CLEARFIELD

AFFIDAVIT

Before me, the undersigned officer, personally appeared, DOROTHY E. LANG ROOT who being duly sworn according to law deposes and says that the facts set forth in the foregoing Complaint are true and correct to the best of her knowledge, information, and belief.

Dorothy E. Lang Root
DOROTHY E. LANG ROOT

Sworn to and subscribed
before me this 13th day
of OCTOBER, 2000.

W. B. N. Smith
Notary Public

My Commission Expires Feb. 23, 2002

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)
NO. 00-
-CD

DOROTHY E. LANG ROOT,
Plaintiff

VS.
NELLIE ROOT SHRAND, et al.,
Defendants

COMPLAINT

R. DENNING GEARHART
ATTORNEY AT LAW
CLEARFIELD, PA. 16830

FILED

NOV 01 2000
M14-64
William A. Shaw
Prothonotary
PO 90-
3 cent stamp
BY ATTY

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff
VS.
NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,
Defendants

NO. 00-1350-CD

ACTION TO QUIET TITLE

FILED

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA
: SS.
COUNTY OF CLEARFIELD

NOV 09 2000
0/4:00 pm
William A. Shaw Esq
Prothonotary
1 Court St Apt 4

R. DENNING GEARHART, who being duly sworn according to law,
deposes and says that in support of his Motion For Publication, the following:

1. A search of the Courthouse records as found in Clearfield County
have provided no further information as to the Defendant, Jane Schrand, her heirs,
successors or assigns.
2. All public records in the Clearfield County Courthouse and local
telephone books have been checked prior to making this Affidavit.
3. That I have made a good faith effort to find the whereabouts of the
Defendant and all her heirs, successors and assigns.

Further, the deponent saith not.

Sworn to and subscribed
before me this 8th day
of November, 2000.

Jennifer A. Cutler
Notary Public

Notarial Seal
Jennifer A. Cutler, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires June 17, 2003

R. Denning Gearhart, Esquire

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff
VS.
NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,
Defendants

NO. 00-1350-CD

ACTION TO QUIET TITLE

CASE NUMBER: 00-1350-CD

TYPE OF CASE: Quiet Title Action

TYPE OF PLEADING: **MOTION FOR PUBLICATION**

FILED ON BEHALF OF: Plaintiff

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQUIRE
Supreme Court I.D. No. 26540
215 East Locust Street
Clearfield, PA 16830
(814) 765-1581

FILED

NOV 09 2000
6/4:00 AM
William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

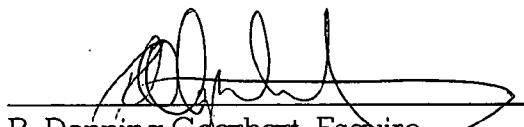
DOROTHY E. LANG ROOT, a widow
Plaintiff
VS. : NO. 00-1350-CD

NELLIE ROOT SCHRAND, her heirs
successors and assigns; : ACTION TO QUIET TITLE
BLODWEN SHRAND HUBER, her heirs,
successors and assigns; :
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,
Defendants :
:

MOTION FOR PUBLICATION

AND NOW, to wit, this 9th day of November, 2000, an Affidavit having
been filed by R. Denning Gearhart, attorney for the Plaintiffs, that the whereabouts of
the above named Defendant, her heirs, successors and assigns, is unknown, the said
R. Denning Gearhart moves the Court for leave to serve the Complaint upon the said
Defendant, her heirs, successors and assigns, generally by publication once in the Bay
City Times, Bay City, Michigan.

Respectfully submitted,


R. Denning Gearhart, Esquire
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff

VS.

NO. 00-1350-CD

NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,

Defendants

ACTION TO QUIET TITLE

O R D E R

AND NOW, to wit, this 14th day of November, 2000, upon
consideration of the foregoing Motion, the Plaintiffs are granted leave to make service
of the Complaint on the Defendants, their heirs, successors and assigns, by publication
once in the Bay City Times, Bay City, Michigan.

BY THE COURT,

JUDGE

FILED

NOV 14 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

MO. 00-1320-CD

DOROTHY E. TANG ROOT, a widow
of Perryville

.2V

ACKNOWLEDGMENT

NETTIE ROOL SCHIRAND, per her
successors and executors;
BLODWEA SHAND HUBER, per her
successors and executors;
JANIE SCHIRAND, per her
successors and executors of
any beneficiary left in her to the extent
of her disclaimed portion, ~~and~~ ^{and} trust
DeGaudens

ORDERS

newspapers, to you, about the W.C.W.M. ~~and~~

BY THE OIR

FILED
NOV 14 2000
11:50 AM
William A. Shaw
Court Clerk

卷之三

20
Leave over margin

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)
NO. 00-1350-CO

DOROTHY E. LANG ROOT,

Plaintiff
vs.

NELLIE ROOT SCHRAND, et al,
Defendants

MOTION FOR PUBLICATION

R. DENNING GEARHART
ATTORNEY AT LAW
CLEARFIELD, PA. 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff :
VS. : NO. 00-1350-CD

NELLIE ROOT SCHRAND, her heirs
successors and assigns; : ACTION TO QUIET TITLE
BLODWEN SHRAND HUBER, her heirs,
successors and assigns; :
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,
Defendants :
:

AFFIDAVIT

FILED

DEC 15 2000

COMMONWEALTH OF PENNSYLVANIA : William A. Shaw
: SS. Prothonotary
COUNTY OF CLEARFIELD :
:

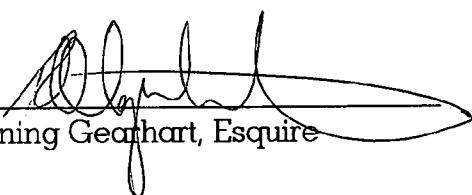
R. DENNING GEARHART, who being duly sworn according to law,
deposes and says that in support of his Motion For Publication, the following:

1. That attempted service by certified mail, restricted delivery, upon the Defendant, Nellie Root Schrand, was not successful.
2. That attempted service by certified mail, restricted delivery, upon the Defendant, Blodwen Schrand Huber, was not successful.
3. A search of the Courthouse records as found in Clearfield County have provided no further information as to the Defendants, Nellie Root Schrand and Blodwen Schrand Huber, nor heirs, successors or assigns.

4. All public records in the Clearfield County Courthouse and local telephone books have been checked prior to making this Affidavit.

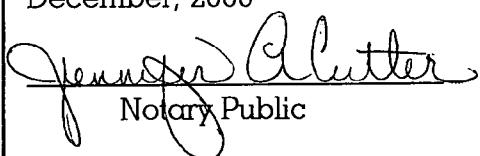
5. That I have made a good faith effort to find the whereabouts of the Defendants and all their heirs, successors and assigns.

Further, the deponent saith not.



R. Denning Gearhart, Esquire

Sworn to and subscribed
before me this 14th day of
December, 2000



Jennifer A. Cutler
Notary Public

Notarial Seal Jennifer A. Cutler, Notary Public Clearfield Boro, Clearfield County My Commission Expires June 17, 2003

FILED

DEC 15 2000

02/55/00 CATH WILSON

William A. Shaw

Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff
VS. : NO. 00-1350-CD

NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,
Defendants : ACTION TO QUIET TITLE

CASE NUMBER: 00-1350-CD

TYPE OF CASE: Quiet Title Action

TYPE OF PLEADING: **MOTION FOR PUBLICATION**

FILED ON BEHALF OF: Plaintiff

COUNSEL OF RECORD FOR THIS PARTY: R. DENNING GEARHART, ESQUIRE
Supreme Court I.D. No. 26540
215 East Locust Street
Clearfield, PA 16830
(814) 765-1581

FILED

DEC 15 2000

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

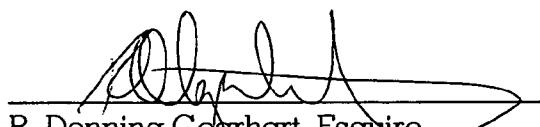
DOROTHY E. LANG ROOT, a widow
Plaintiff
VS. : NO. 00-1350-CD

NELLIE ROOT SCHRAND, her heirs
successors and assigns; : ACTION TO QUIET TITLE
BLODWEN SHRAND HUBER, her heirs,
successors and assigns; :
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,
Defendants :
.

MOTION FOR PUBLICATION

AND NOW, to wit, this 15th day of December, 2000, on Affidavit having
been filed by R. Denning Gearhart, attorney for the Plaintiffs, that the whereabouts of
the above named Defendants, their heirs, successors and assigns, is unknown, the said
R. Denning Gearhart moves the Court for leave to serve the Complaint upon the said
Defendants, their heirs, successors and assigns, generally by publication once in the
Bay City Times, Bay City, Michigan and the St. Louis Post Dispatch, St. Louis, Missouri.

Respectfully submitted,


R. Denning Gearhart, Esquire
Attorney for Plaintiff

FILED ~~for~~
DEC 15 2000
012511 Shaw
William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff
VS.

NO. 00-1350-CD

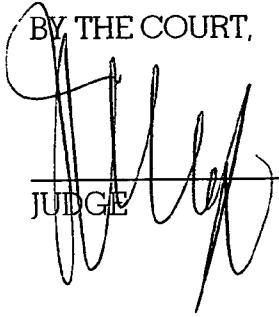
NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,
Defendants

ACTION TO QUIET TITLE

ORDER

AND NOW, to wit, this 21st day of December, 2000, upon
consideration of the foregoing Motion, the Plaintiffs are granted leave to make service
of the Complaint on the Defendants, their heirs, successors and assigns, by publication
once in the Bay City Times, Bay City, Michigan, and the St. Louis Post Dispatch.

BY THE COURT,


JUDGE

FILED

Dec 21 2000

William A. Shaw
Prothonotary

FILED

DEC 21 2000
Off. of the City
William A. Shaw
Prothonotary
Philadelphia

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff

VS.

NO. 00-1350-CD

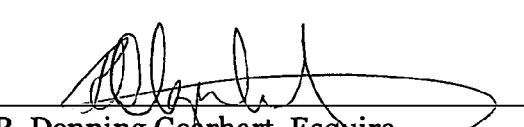
NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,

Defendants

ACTION TO QUIET TITLE

AFFIDAVIT

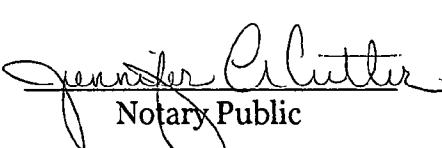
The undersigned hereby certifies that he did cause to have published in The Bay City Times the Notice for the Complaint with regard to the Quiet Title Action filed to the above on the Defendants, their heirs, successors and assigns, as evidenced by Exhibit 'A' attached hereto.


R. Denning Gearhart, Esquire
Attorney for Plaintiff

Sworn to and subscribed

before me this 24th day

of January, 2001.


Jennifer A. Cutler
Notary Public

Notarial Seal
Jennifer A. Cutler, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires June 17, 2003

FILED

JAN 24 2001

William A. Shaw
Prothonotary

AFFIDAVIT OF PUBLICATION

The Bay City Times

STATE OF MICHIGAN
COUNTY OF BAY } ss.

Victoria Eddy

being duly sworn, deposes and says that he/she is the acting principal Clerk of THE BAY CITY TIMES, a newspaper printed, published and circulated in the City of Bay City and the County of Bay; that a notice, of which the annexed printed notice is a true copy, taken from said newspaper, has been duly published in said newspaper _____ successive preceding days the _____ day of _____ 19____ mentioned in said notice, and that the said notice was so published in said newspaper on the

18th days of January 2001

days of 19

days of 19

days of 19

Subscribed and sworn to before me this 10
January 2001

day of A.D.,

Denise F. Taglauer
Notary Public in and for Bay County, Michigan

My commission expires Sept. 15 2001

PRINTERS CHARGES

Lines

Times

Dollars Cents

Affidavit Charge Cents

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)DOROTHY E. LANG ROOT, a widow
Plaintiff

VS.

NELLIE ROOT SCHRAND, her heirs
successors and assigns:BLODWEN SCHRAND HUBER, her heirs,
successors and assigns;JANE SCHRAND, her heirs, successors
and assigns, and/or any person or entity
claiming title in and to the herein described
premises under them,
Defendants

NO. 00-1350-CD

ACTION TO QUIET TITLE

NOTICE
TO THE ABOVE NAMED DEFENDANTS, their heirs, successors and assigns:
YOU HAVE BEEN SUED IN COURT. If you wish to defend against the
claims set forth in the following pages, you must take action within twenty
(20) days after this Complaint and Notice are served, by entering a written
appearance personally or by attorney and filing in writing with the Court your
defense or objections to the claim set forth against you. You are warned that
if you fail to do so, the case may proceed without further notice for any
money claimed in the Complaint or for any other claim or relief requested by
the Plaintiffs. 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 OR CANNOT AFFORD ONE, GO TO OR
TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE
YOU CAN GET LEGAL HELP.**

COURT ADMINISTRATOR'S OFFICE
Clearfield County Courthouse
Clearfield, PA 16830
(814) 765-2641 ext. 50-51

You are hereby notified that an Action to Quiet Title to all that certain
piece or parcel of land situate in the Commonwealth of Pennsylvania,
County of Clearfield, Township of Beccaria, having Tax map No. 11-H26-
350-00012, and more particularly described as follows:

ALL those three certain piece or parcel of land situate in the Township of
Beccaria, county of Clearfield and State of Pennsylvania, bounded and
described as follows:

BEGINNING at a stone corner of the grantor and H.L. McCoy and on line
of S.C. Shoff; thence by the H.L. McCoy line North 5 degrees (5) East
seventy-three (73) rods to a Cherry Corner; thence by land of the grantor,
South eighty-six degrees and thirty minutes East seventy-two and two
tenths (72.2) rods to a sugar; thence by land of the Grantor, South sixty-five
degrees (65) east thirty-one and two tenths (31.2) rods to a post on the right
of way of Public Road leading from Beccaria to Madera; thence by said right
of way South twelve degrees and thirty minutes West six and four tenths
(6.4) rods; thence by the same South twelve degrees and thirty minutes
East twenty-two and six tenths (22.6) rods; thence by the same South four
degrees (4) fourteen (14) rods; thence by the same South twenty degrees
and thirty minutes West twenty-two and eight tenths (22.8) rods to a post;
thence by line of S.C. Shoff North eighty-five degrees (85) West ninety-nine
and four tenths (99.4) rods to the place of beginning, containing forty-five
acres and fifty-four perches neat measure.

Further, the Court of Common Pleas of Clearfield County, Pennsylvania,
did by Order executed on the 9th day of November, 2000, direct that notice
of this action be served upon you by advertisement in the Bay City Times
and that if you do not appear or otherwise defend such action within thirty
(30) days from the date of advertisement, you shall be, by appropriate order,
forever barred from asserting any right, lien, title or interest or claim of the
Plaintiffs, as set forth in their complaint.

R. Denning Gearhart, Esquire
Attorney for Plaintiffs
215 East Locust Street
Clearfield, PA 16830
(814) 765-1581

Affidavit of Publication

THE BAY CITY TIMES

Bay City, Michigan

IN THE MATTER OF

Received and Filed the _____ day of

A.D. 19 _____

Hiring full-time position
tele required. Guaranteed per
hour wages dependent on experience. For interview 886-8992.

INCOME TAX CHECKER

/ PROCESSOR

Accounting firm looking for TAX CHECKERS and PROCESSORS
Jan. through April 15. Must have attended H & R Block Tax School or equivalent experience. Contact Box M49, Bay City Times, 311 - 5th St., Bay City, MI 48708.

INSTALLATION & REPAIR

Must have driver's license. Call 892-4703.

INSTALLERS

VINYL SIDING & WINDOW
Must have replacement experience. Need to have own tools and truck. Top pay in industry. Call Dave at 1-800-621-2828.

JANITORS NEEDED

Part-time, 2nd shift. Immediate opening. Call APS at 921-0358.

KELLY

SERVICES NOW HIRING FOR Manufacturing Positions

All Shifts

Call 517-799-5761

LEGAL SECRETARY

For Saginaw Township firm. Proficiency in transcription and Microsoft Word preferred. Previous legal experience a plus. Benefits include paid vacation, medical and retirement plan. Send resumes to Box M0011, Bay City Times, 311 - 5th St., Bay City, MI 48708.

LEGAL SECRETARY

Solid credentials and previous legal experience preferred. Knowledge of WordPerfect helpful. Salary commensurate with experience. Benefits include paid vacation, medical and retirement plan. Call 517-662-7552.

CASHIER

Adult business. Full time. Sales experience. Over 18, with valid photo ID. Apply 1704 Woodsdale Ct., Bay City.

CASHIER

Full or part-time. Apply in person only at Marathon Fax Pax at Mackinaw Rd. & US-10.

CDMI Truck Driving School

Can put you on the road to success. Hundreds of Job Opportunities. Placement Assistance. 1-800-643-1623

CLERICAL & DATA ENTRY

Positions. Call 790-3000 Snelling Personnel

COOK

\$6.50- \$9.00 / hr. Retirement. Apply at Mulligans Pub.

COUNSELOR AID

every other weekend, 7 AM - 3 PM for substance abuse residential facility. Experience in education in substance abuse counseling. Must be able to work alone with thirteen adult residential patients. Competitive wage. Fax cover letter and resume to director at 517-631-0242 by January 22, 2001.

Day/Evening Shifts

Must have reliable transportation and Valid Drivers License

Apply Weekdays

6:00 a.m. - 4:00 p.m. Phone 1-800-992-8316

We will guarantee you an interview

Join RBS

145 Travel, Trips,
Guided Tours

PLAN YOUR TRAVEL for your

Couple Wanted to manage and

Leave over margin

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)
NO. 00-1350-CD

DOROTHY E. LANG ROOT,
Plaintiff

vs.

NELLIE ROOT SCHRAND, et al,
Defendants

AFFIDAVIT

FILED

JAN 24 2001

O/107 WCC
William A. Shaw
Prothonotary

R. DENNING GEARHART
ATTORNEY AT LAW
CLEARFIELD, PA. 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff
VS.

NO. 00-1350-CD

NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,

ACTION TO QUIET TITLE

Defendants

CASE NUMBER: 00-1350-CD

TYPE OF CASE: Quiet Title Action

TYPE OF PLEADING: MOTION FOR PUBLICATION

FILED ON BEHALF OF: Plaintiff

COUNSEL OF RECORD FOR THIS PARTY:

R. DENNING GEARHART, ESQUIRE
Supreme Court I.D. No. 26540
215 East Locust Street
Clearfield, PA 16830
(814) 765-1581

FILED

FEB 20 2001

William A. Shaw
Prothonotary

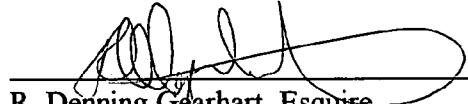
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow Plaintiff
VS. : NO. 00-1350-CD
: :
NELLIE ROOT SCHRAND, her heirs
successors and assigns; : ACTION TO QUIET TITLE
BLODWEN SHRAND HUBER, her heirs,
successors and assigns; :
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them, :
Defendants :
:

MOTION FOR PUBLICATION

AND NOW, to wit, the 15th day of December, 2000, an Affidavit having been filed by R. Denning Gearhart, attorney for the Plaintiffs, that the whereabouts of the above named Defendants, their heirs, successors and assigns, is unknown, and upon further research, it was discovered that service would be better had by publication in another newspaper, the said R. Denning Gearhart moves the Court for leave to serve the Complaint upon the said Defendants, their heirs, successors and assigns, generally by publication once in the Independent News, Florissant, Missouri.

Respectfully submitted,



R. Denning Gearhart, Esquire
Attorney for Plaintiff

FILED

FEB 20 2001

01945
William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow
Plaintiff
VS.

NO. 00-1350-CD

NELLIE ROOT SCHRAND, her heirs
successors and assigns;
BLODWEN SHRAND HUBER, her heirs,
successors and assigns;
JANE SCHRAND, her heirs, successors
and assigns, and/or any person or
entity claiming title in and to the herein
described premises under them,

ACTION TO QUIET TITLE

Defendants

ORDER

AND NOW, to wit, this 25th day of February, 2001, upon
consideration of the foregoing Motion, the Plaintiffs are granted leave to make service of the
Complaint on the Defendants, their heirs, successors and assigns, by publication once in the
Independent News, Florissant, Missouri.

BY THE COURT,

JUDGE

FILED

FEB 20 2001

William A. Shaw
Prothonotary

FILED

FEB 20 2001

5/4/02 1:02 PM
cc: atty
William A. Shaw
Prothonotary

for Merchant

D
Lap over margin

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)
No. 00-1350-CD

DOROTHY E. LANG ROOT,
Plaintiff

VS.
NELLIE ROOT SCHRAND, et al,
Defendants

MOTION FOR PUBLICATION

FILED

FEB 20 2001

O/9/45
William A. Shaw
Prothonotary

Rey Gearhart

R. DENNING GEARHART
ATTORNEY AT LAW
CLEARFIELD, PA. 16830

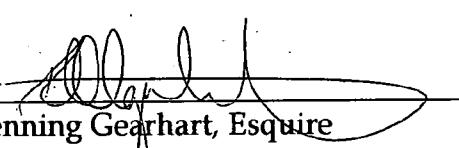
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow :
Plaintiff :
VS. : NO. 00-1350-CD

NELLIE ROOT SHRAND, her heirs :
successors and assigns; : ACTION TO QUIET TITLE
BLOWDYN SHRAND, his heirs, :
successors and assigns; :
JANE SHRAND, her heirs, successors :
and assigns, and/or any person or :
entity claiming title in and to the herein :
described premises under them, :
Defendants :

AFFIDAVIT

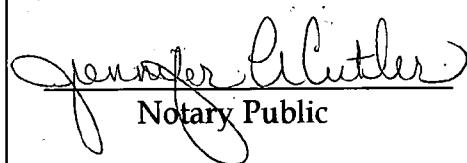
The undersigned hereby certifies that he did cause to have published in the Independent News the Notice for the Complaint with regard to the Quiet Title Action filed to the above on the Defendants, their heirs, successors and assigns, as evidenced by Exhibit 'A' attached hereto.


R. Denning Gearhart, Esquire
Attorney for Plaintiff

Sworn to and subscribed

before me this 15th day

of March, 2001.


Jennifer A. Cutler
Notary Public

Notarial Seal
Jennifer A. Cutler, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires June 17, 2003

FILED

MAR 16 2001

William A. Shaw
Prothonotary

FILED

MAR 16 2001

01/23/00
William A. Shaw
Prothonotary
SAC

R. DENNING GEARHART
ATTORNEY AT LAW
CLEARFIELD, PA, 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

DOROTHY E. LANG ROOT, a widow :
Plaintiff :
VS. : NO. 00-1350 -CD
:

NELLIE ROOT SHRAND, her heirs :
successors and assigns; : ACTION TO QUIET TITLE
BLOWDYN SHRAND, his heirs, :
successors and assigns; :
JANE SHRAND, her heirs, successors :
and assigns, and/or any person or :
entity claiming title in and to the herein :
described premises under them, :
Defendants :

FILED

APR 04 2001

William A. Shaw
Prothonotary

O R D E R

AND NOW, this 4th day of APRIL, 2001, it appearing
that service of the Complaint in the above captioned case, with notice to plead, was
served in the Bay City Times, Bay City, Michigan, and the Independent News, Florissant,
Missouri, and an Affidavit having been filed with the Prothonotary as to attempts made
to obtain information and the whereabouts of the Defendants, and it further appearing
that no answer has been filed nor appearance entered by any of the said Defendants or
their duly authorized representatives and more than twenty (20) days having elapsed
since the advertisement thereof, it is hereby ORDERED as follows:

1. That the above named Defendants, their heirs, successors and
assigns, are forever barred from asserting any right, title, lien or interest inconsistent with
the interest or claim of the Plaintiffs as set forth in her Complaint in and for all that
certain piece or parcel of land situate in the Commonwealth of Pennsylvania, County of
Clearfield, Township of Beccaria and more particularly described as follows:

BEGINNING at a stone corner of the grantor and H.L. McCoy and on line of S.C. Shoff; thence by the H.L. McCoy line North five degrees (5) East seventy-three (73) rods to a Cherry corner; thence by land of the grantor, South eighty-six degrees and thirty minutes East seventy-two and two tenths (72.2) rods to a sugar; thence by land of the Grantor, South sixty-five degrees (65) East thirty-one and two tenths (31.2) rods to a post on the right of way of Public Road leading from Beccaria to Madera; thence by said right of way South twelve degrees and thirty minutes West six and four tenths (6.4) rods; thence by the same South twelve degrees and thirty minutes East twenty-two and six tenths (22.6) rods; thence by the same South four degrees (4) fourteen (14) rods; thence by the same South twenty degrees and thirty minutes West twenty-two and eight tenths (22.8) rods to a post; thence by line of S.C. Shoff North eighty-five degree (85) West ninety-nine and four tenths (99.4) rods to the place of beginning, containing forty-five acres and fifty-four perches neat measure.

Said Order to be final and absolute unless the aforesaid Defendants, their heirs, successors and assigns, shall file exceptions to this Order within thirty (30) days of the date hereof.

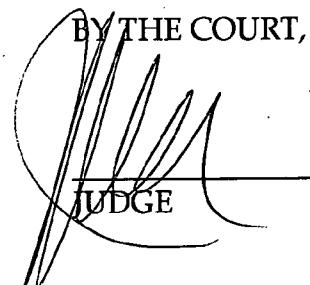
2. That if said above named Defendants, their heirs, successors and assigns, shall not have filed said exceptions within thirty (30) days, the Prothonotary, upon Praecept of Plaintiffs, shall enter final judgment for Plaintiffs and against said named Defendants, their heirs, successors and assigns.

3. That the rights of Plaintiffs in said premises are at all times superior to the rights of said named Defendants, their heirs, successors and assigns and that the Plaintiffs havw title in fee simple to said premises described in the Complaint as against said Defendants, their heirs, successors and assigns.

4. That the Defendants, their heirs, successors and assigns or any person claiming under them shall be forever enjoined from setting up any title to the premises of Plaintiffs described in the Complaint and from impeaching, denying or in any way attacking the title of Plaintiffs to said premises.

5. That these proceedings, or any authenticated copy thereof, shall at all times hereafter be taken as evidence of the facts declared and established thereby.

6. That a certified copy of this Order shall be recorded in the Office of
the Recorder of Deeds of Clearfield County, Pennsylvania.

BY THE COURT,

JUDGE

FILED

APR 04 2001
3:06 PM
William A. Shaw
Prothonotary

cc: John Hart
John Hart

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
(CIVIL DIVISION)

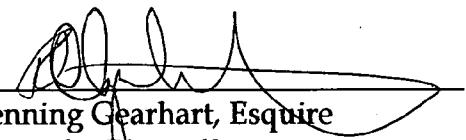
DOROTHY E. LANG ROOT, a widow :
Plaintiff :
VS. : NO. 00-1350-CD
:
NELLIE ROOT SHRAND, her heirs :
successors and assigns; : ACTION TO QUIET TITLE
BLOWDYN SHRAND, his heirs, :
successors and assigns; :
JANE SHRAND, her heirs, successors :
and assigns, and/or any person or :
entity claiming title in and to the herein :
described premises under them, :
Defendants :

PRAECIPE TO ENTER FINAL JUDGMENT

TO THE PROTHONOTARY:

Please enter a final judgment against the above named Defendants, their heirs, successors and assigns and on behalf of the above named Plaintiffs for such relief as requested in an Order dated the 4th day of April, 2001.

Respectfully submitted,


R. Denning Gearhart, Esquire
Attorney for Plaintiff

FILED

MAY 09 2001
M 12, 13/2001
William A. Shaw
Prothonotary