

00-1363-CD
RONALD P. DYSARD etal -vs- STEPHEN E. SIEGLER etal

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

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

RONALD P. DYSARD and
BARBARA ANN DYSARD,
Plaintiffs

vs.

STEPHEN E. SIEGLER and
GWEN MICHELE SIEGLER, a/k/a
GWEN SIEGLER KRILOVA, and
any heirs, persons claiming, or who might
claim title under the aforesaid defendants;
and any other person, persons, firms,
partnerships, or corporate entities
who might claim title to the premises
herein described,

Defendants

No. 00-1363 C.D.

ACTION TO QUIET TITLE

Type of Pleading: Complaint

Filed on behalf of: Ronald P. Dysard
and Barbara Ann Dysard

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law

Supreme Court No. 42519
900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

FILED

NOV 06 2000

William A. Shaw
Prothonotary

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(CIVIL DIVISION)

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herein described,
Defendants

ACTION TO QUIET TITLE

NOTICE

TO DEFENDANTS:

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 judgement 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 OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Office of the Court Administrator
Clearfield County Courthouse
One North Second Street
Clearfield, PA 16830
(814) 765-2641 ext. 5982

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COMPLAINT

NOW COMES, Plaintiffs, Ronald P. Dysard and Barbara Ann Dysard, by and through their attorneys, The Hopkins Law Firm, and avers as follows:

1. Plaintiffs, Ronald P. Dysard and Barbara Ann Dysard, reside at 666 Observatory Drive, Lewisberry, Pennsylvania 17339.

2. Defendant Stephen E. Siegler resides at 443 Cool Creek Road, Wrightsville, Pennsylvania 17368-9615.

3. Defendant Gwen Michele Siegler a/k/a Gwen Siegler Krilova resides in the City of Virginia Beach in the Commonwealth of Virginia.

4. The property to be quieted is described as follows:

All that certain tract of land designated as Section 19, Lot 375, in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania.

5. By deed dated November 1, 1998, and recorded in the Clearfield County Office of the Recorder of Deeds as Instrument No. 199902910, Plaintiffs received title to the property set forth in paragraph 3 from Richard Otis Siegler, acting as attorney in fact for Edgar Clayton Siegler, Richard O. Siegler and Marcella R. Siegler, husband and wife, Defendant Stephen E. Siegler and Defendant Gwen Michele Siegler.

6. In accepting title to the property described in paragraph four (4), Plaintiff's relied upon a facsimile Power of Attorney from Stephen E. Siegler and Gwen Siegler Krilova to Richard O. Siegler, a copy of which is attached hereto as Exhibit "A-1" and Exhibit "A-2".

7. Plaintiff has come to learn that the said Stephen E. Siegler and Gwen Siegler Krilova may not have executed the Power of Attorney and same may have been forged notwithstanding the fact that the Power of Attorney are notarized.

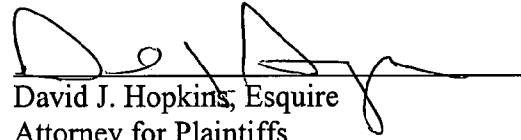
8. Plaintiffs paid fair market value for the property and Defendants have not made a claim upon title to the property.

9. The purpose of this quiet title action is to clear up any clouds upon the title to the property as a result of the alleged fraudulent Power of Attorney and further to extinguish any interest in the property which Defendant Stephen E. Siegler and Gwen Siegler Krilova may possess in the property together with their spouses.

WHEREFORE, the Plaintiff requests the Court to decree that title to the premises described herein be granted unto Plaintiffs in fee simple and absolutely; and that the Defendants, their heirs, devisees, executors, administrators, and assigns, and all other person, persons, firms, partnerships, or corporate entities in interests, or their legal representatives be forever barred

from asserting any right, lien, or interest inconsistent with the interest or claim of the Plaintiffs as set forth herein, in and to the property described in paragraph four (4).

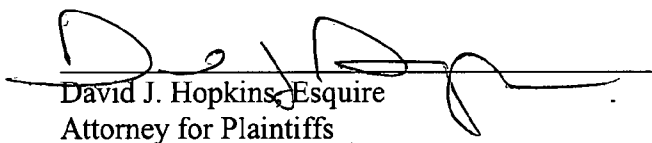
Respectfully submitted,



David J. Hopkins, Esquire
Attorney for Plaintiffs

VERIFICATION

I, David J. Hopkins, have discussed this case with Defendant Stephen Siegler, Defendant Gwen Siegler Krilova and their attorney Richard C. Low of Lancaster, Pennsylvania and to the best of my knowledge, information and belief, I verify that the statements made in this pleading are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to Unsworn Falsification to Authorities. The Plaintiffs are currently out of the Commonwealth of Pennsylvania and unavailable to review this pleading prior to its filing.

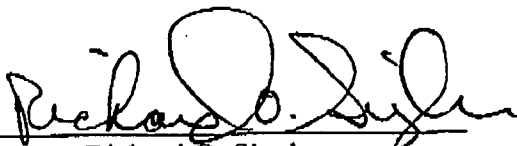

David J. Hopkins, Esquire
Attorney for Plaintiffs

SPECIAL POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS, that I, Gwen Michelle Siegler, of Virginia Beach, Virginia, make, constitute and appoint Richard O. Siegler, of Union County, Pennsylvania, my true and lawful attorney-in-fact for me and on my behalf, to perform only the following acts but no others: to execute on my behalf all documents and instruments relating to the sale of premises located at Treasure Lake, Cayman's Landing, Lot 375, Dubois, Pennsylvania, including but not limited to listing contracts, agreements of sale, deeds, settlement statements, title insurance affidavits, disbursement statements, checks, and any and all other forms and documents normally required to consummate the sale.

This Special Power of Attorney shall not be affected by my subsequent disability or incapacity.

The following is a specimen signature of the person to whom this Special Power of Attorney is given:


Richard O. Siegler

EXECUTED ON 12-24-98 1998.


Gwen Michelle Siegler

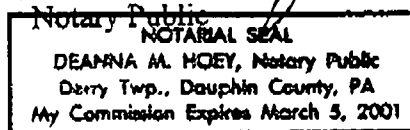
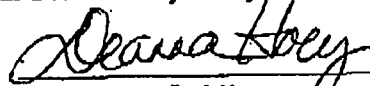
STATE OF PENNSYLVANIA)

COUNTY OF DAUPHIN)

) ss:

On the ^{21st} day of December, 1998, before me, the subscriber, a Notary Public, personally appeared the above-named Gwen Michelle Siegler, and in due form of law acknowledged the foregoing Special Power of Attorney to be her act and deed and desired the same to be recorded as such.

Witness my hand and Notarial Seal the day and year aforesaid.

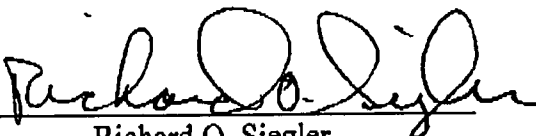


SPECIAL POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS, that I, Stephen Siegler, of York County, Pennsylvania, make, constitute and appoint Richard O. Siegler, of Union County, Pennsylvania, my true and lawful attorney-in-fact for me and on my behalf, to perform only the following acts but no others: to execute on my behalf all documents and instruments relating to the sale of premises located at Treasure Lake, Cayman's Landing, Lot 375, Dubois, Pennsylvania, including but not limited to listing contracts, agreements of sale, deeds, settlement statements, title insurance affidavits, disbursement statements, checks, and any and all other forms and documents normally required to consummate the sale.

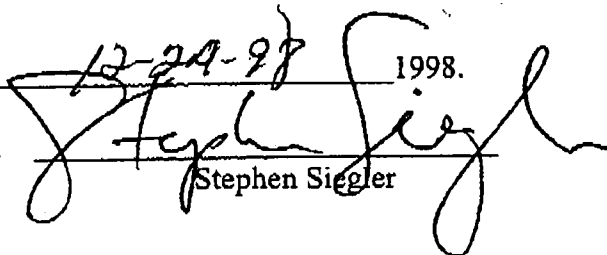
This Special Power of Attorney shall not be affected by my subsequent disability or incapacity.

The following is a specimen signature of the person to whom this Special Power of Attorney is given:


Richard O. Siegler

EXECUTED ON

12-24-98 1998.


Stephen Siegler

STATE OF PENNSYLVANIA)

COUNTY OF)

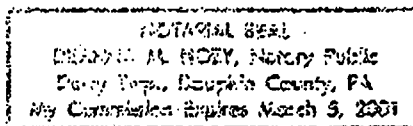
DAUPHIN

) ss:

On the 24th day of December 1998, before me, the subscriber, a Notary Public, personally appeared the above-named Stephen Siegler, and in due form of law acknowledged the foregoing Special Power of Attorney to be his act and deed and desired the same to be recorded as such.

Witness my hand and Notarial Seal the day and year aforesaid.

Deanna L. Hoyer
Notary Public



Deanna L. Hoyer

for service
Reinstated/Reinstated to Special Attorney
Document

30 July 01 Document
Reinstated/~~Reinstated~~/Attorney
for service.


~~Edward P. O'Rourke~~

FILED

SPD NOV 08 2000
NOV 10 10:43 AM
William A. Shaw
Promotary

DD \$90.00
2cc atty Hopkins

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10399

DYSARD, RONALD P. and BARBARA ANN

00-1363-CD

VS.

SIEGLER, STEPHEN E. AI

COMPLAINT ACTION TO QUIET TITLE

SHERIFF RETURNS

NOW NOVEMBER 17, 2000, WILLIAM HOSE, SHERIFF OF YORK COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON STEPHEN E. SIEGLER, DEFENDANT.

FILED
DEC 15 2000
013104 gp
William A. Shaw
Prothonotary

NOW NOVEMBER 28, 2000 SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON STEPHEN E. SIEGLER, DEFENDANT BY DEPUTIZING THE SHERIFF OF YORK COUNTY. THE RETURN OF SHERIFF HOSE IS HERETO ATTACHED AND MADE A PART OF THIS RETURN.

Return Costs

Cost	Description
27.88	SHFF. HAWKINS PAID BY: ATTY.
29.10	SHFF. HOSE PAID BY: ATTY.
10.00	SURCHARGE PAID BY: ATTY.

Sworn to Before Me This

15 Day Of Dec 2000

William A. Shaw

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2002
Clearfield Co. Clearfield, PA.

So Answers,

Chester A. Hawkins
My Mary Ann Hawkins
Chester A. Hawkins
Sheriff

COUNTY OF YORK OFFICE OF THE SHERIFF

28 EAST MARKET ST., YORK, PA 17401

SERVICE CALL
(717) 771-9601

SHERIFF SERVICE PROCESS RECEIPT and AFFIDAVIT OF RETURN

INSTRUCTIONS
PLEASE TYPE ONLY LINE 1 THRU 12
DO NOT DETACH ANY COPIES

1. PLAINTIFF/S/ RONALD P. DYSARD AND BARBARA ANN DYSARD		2. COURT NUMBER 00-1363-C.D.	
3. DEFENDANT/S/ STEPHEN E. SIEGLER AND GWEN MICHELE SIEGLER A/K/A GWEN SIEGLER KRILOVA		4. TYPE OF WRIT OR COMPLAINT COMPLAINT ACTION TO QUIET TITLE	
SERVE AT	{	5. NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO BE LEVIED, ATTACHED, OR SOLD. STEPHEN E. SIEGLER	
	6. ADDRESS (STREET OR RFO WITH BOX NUMBER, APT. NO., CITY, BORO, TWP., STATE AND ZIP CODE) 443 COOL CREEK RD., WRIGHTSVILLE, PA 17368		
7. INDICATE SERVICE: <input type="checkbox"/> PERSONAL <input type="checkbox"/> PERSON IN CHARGE <input type="checkbox"/> DEPUTIZE <input type="checkbox"/> CERT. MAIL <input type="checkbox"/> 1ST CLASS MAIL <input type="checkbox"/> POSTED <input type="checkbox"/> OTHER			
NOW _____, 20____ I, SHERIFF OF YORK COUNTY, PA, do hereby deputize the sheriff of _____ COUNTY to execute this Writ and make return thereof according to law. This deputization being made at the request and risk of the plaintiff. _____ SHERIFF OF YORK COUNTY			
8. SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE:			

OUT OF COUNTY
CLEARFIELD

ADVANCE FEE PAID BY ATTY

NOTE: ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN - Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession, after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction, or removal of any property before sheriff's sale thereof.

9. TYPE NAME and ADDRESS of ATTORNEY / ORIGINATOR and SIGNATURE DAVID J. HOPKINS, ESQ. 900 BEAVER DR., DUBOIS, PA 15801		10. TELEPHONE NUMBER (814) 375-0300	11. DATE FILED 11/6/00
12. SEND NOTICE OF SERVICE COPY TO NAME AND ADDRESS BELOW: (This area must be completed if notice is to be mailed). CLEARFIELD COUNTY SHERIFF			

SPACE BELOW FOR USE OF THE SHERIFF - DO NOT WRITE BELOW THIS LINE

13. I acknowledge receipt of the writ or complaint as indicated above. J. LUDWIG		14. DATE RECEIVED 11/20/00	15. Expiration/Hearing Date 12/6/00
16. HOW SERVED: PERSONAL (X) RESIDENCE (X) POSTED () POE () SHERIFF'S OFFICE () OTHER () SEE REMARKS BELOW			
17. <input type="checkbox"/> I hereby certify and return a NOT FOUND because I am unable to locate the individual, company, etc. named above. (See remarks below.)			
18. NAME AND TITLE OF INDIVIDUAL SERVED / LIST ADDRESS HERE IF NOT SHOWN ABOVE (Relationship to Defendant)		19. Date of Service 11/28/00	20. Time of Service 12:41
21. ATTEMPTS	Date	Time	Miles
1	11/28	12:41	28 BS
22. REMARKS:			

23. Advance Costs 40.00	24. Service Costs 18.00	25. N/F	26. Mileage 9.10	27. Postage	28. Sub Total 27.10	29. Pound	30. Notary 2.00	31. Surchg.	32. Tot. Costs 29.10	33. Costs Due or Refund 10.90	Check No. 143009	
34. Foreign County Costs	35. Advance Costs	36. Service Costs	37. Notary Cert.	38. Mileage/Postage/Not Found	39. Total Costs	40. Costs Due or Refund						

41. AFFIRMED and subscribed to before me this 29TH		SO ANSWERS			
42. day of NOVEMBER 2000		44. Signature of Dep. Sheriff <i>Bye Slehti</i>		45. DATE 11/28/00	
<div style="border: 1px solid black; padding: 5px;"> NOTARIAL SEAL MELISSA J. SHAFER, Notary Public City of York, York County My Commission Expires April 29, 2002 </div>		46. Signature of York County Sheriff WILLIAM M. HOSE		47. DATE 11/29/00	
		48. Signature of Foreign County Sheriff		49. DATE	
50. I ACKNOWLEDGE RECEIPT OF THE SHERIFF'S RETURN SIGNATURE OF AUTHORIZED ISSUING AUTHORITY AND TITLE					51. DATE RECEIVED

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

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

RONALD P. DYSARD and
BARBARA ANN DYSARD,
Plaintiffs

vs.

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any heirs, persons claiming, or who might
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and any other person, persons, firms,
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herein described,

Defendants

No. 00-1363 C.D.

ACTION TO QUIET TITLE

Type of Pleading: Praecipe to Enter
Default Judgment

Filed on behalf of: Ronald P. Dysard
and Barbara Ann Dysard, Plaintiffs

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law

Supreme Court No. 42519
900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

FILED
FEB 14 2001
William A. Shaw
Prothonotary

FILED

FEB 16 2001

William A. Shaw
Prothonotary

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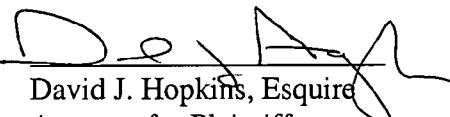
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Defendants

ACTION TO QUIET TITLE

PRECIPE TO ENTER DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Kindly enter judgment in favor of Plaintiffs, Ronald P. Dysard and Barbara Ann Dysard and against Defendant, Stephen E. Siegler, for failure to file within the required time an answer to a Complaint which contained a Notice to Defend. Judgment should be entered in favor of Plaintiffs.


David J. Hopkins, Esquire
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
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TO: Stephen E. Siegler
443 Cool Creek Road
Wrightsville, PA 17368

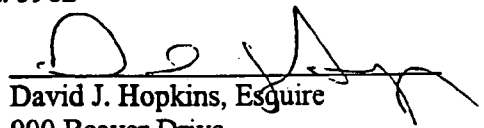
DATE OF NOTICE: January 3, 2001

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS NOTICE TO A 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.

Office of the Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, Pennsylvania 16830
(814) 765-2641 ext. 5982


David J. Hopkins, Esquire
900 Beaver Drive
DuBois, PA 15801
(814) 375-0300

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15
VOICE: (814) 375-0300

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ACTION TO QUIET TITLE

JUDGMENT NOTICE

Please take note that judgment has been entered against you on the issue of
ownership or other property rights in the above captioned matter.

JUDGMENT ENTERED AGAINST STEPHEN E. SIEGLER ONLY

Prothonotary

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

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ACTION TO QUIET TITLE

Type of Pleading: Praecipe to Reinstate
Complaint

Filed on behalf of: Plaintiffs

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law
Supreme Court No. 42519

900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

FILED

JUL 3 2001

William A. Shaw
Prothonotary

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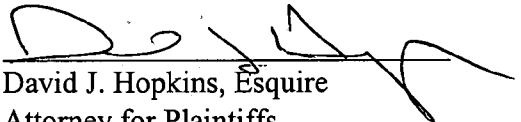
ACTION TO QUIET TITLE

for service
Reinstated by Plaintiff
Document
Dated 12/1/00

PRAECIPE TO REINSTATE COMPLAINT

Kindly reinstate the Complaint filed in the above captioned matter.

Respectfully submitted,


David J. Hopkins, Esquire
Attorney for Plaintiffs

FILED

MAR 3 11 2001

William A. Shaw
Prothonotary

att. H. p. k. n. o
att. H. p. k. n. o p. d.

\$7.00

1 comp. serv. to
att. H. p. k. n. o

WAS

7.30.01 Document
Reinstated/Reinstated to Sheriff/Attorney
for service.

Deputy Prothonotary

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0309 FAX: (814) 375-5035

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CERTIFICATE OF SERVICE

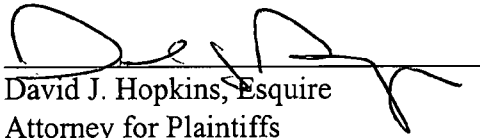
I, the undersigned, hereby certify that a true and correct copy of the Quiet Title Complaint filed on behalf of Ronald P. Dysard and Barbara Ann Dysard was forwarded on the November 13, 2000, by certified mail, article number 7099 3220 0011 0194 9966, addressed as follows:

Ms. Gwen Krilova
515 High Point Avenue
Virginia Beach, VA 23451

FILED

AUG 06 2001

William A. Shaw
Prothonotary


David J. Hopkins, Esquire
Attorney for Plaintiffs
Supreme Court No. 42519

THE HOPKINS LAW FIRM
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Default Judgment

Filed on behalf of: Ronald P. Dysard
and Barbara Ann Dysard, Plaintiffs

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law

Supreme Court No. 42519
900 Beaver Drive
DuBois, Pennsylvania 15801

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FILED

AUG 15 2001

William A. Shaw
Prothonotary

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

RONALD P. DYSARD and
BARBARA ANN DYSARD,
Plaintiffs

vs.

No. 00-1363 C.D.

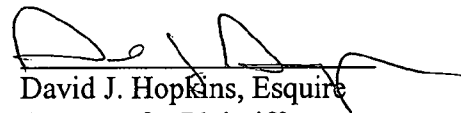
STEPHEN E. SIEGLER and
GWEN MICHELE SIEGLER, a/k/a
GWEN SIEGLER KRILOVA, and
any heirs, persons claiming, or who might
claim title under the aforesaid defendants;
and any other person, persons, firms,
partnerships, or corporate entities
who might claim title to the premises
herein described,
Defendants

ACTION TO QUIET TITLE

PRECIPE TO ENTER DEFAULT JUDGMENT

TO THE PROTHONOTARY:

Kindly enter judgment in favor of Plaintiffs, Ronald P. Dysard and Barbara Ann
Dysard and against Defendant, Gwen Michele Siegler a/k/a Gwen Siegler Krilova, for
failure to file within the required time an answer to a Complaint which contained a
Notice to Defend. Judgment should be entered in favor of Plaintiffs.


David J. Hopkins, Esquire
Attorney for Plaintiffs

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
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herein described,
Defendants

ACTION TO QUIET TITLE

TO: Gwen M. Krilov
632 Smoke House Road
West Chester, PA 19382

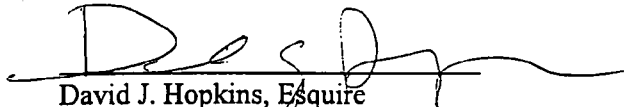
DATE OF NOTICE: August 1, 2001

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS.

YOU SHOULD TAKE THIS NOTICE TO A 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.

Office of the Court Administrator
Clearfield County Courthouse
230 E. Market Street
Clearfield, Pennsylvania 16830
(814) 765-2641 ext. 5982


David J. Hopkins, Esquire
900 Beaver Drive
DuBois, PA 15801

FILED

AUG 15 2001

William A. Shaw
Prothonotary



THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0306 FAX: (814) 375-5035

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

RONALD P. DYSARD and
BARBARA ANN DYSARD,
Plaintiffs

vs.

STEPHEN E. SIEGLER and
GWEN MICHELE SIEGLER, a/k/a
GWEN SIEGLER KRILOVA, and
any heirs, persons claiming, or who might
claim title under the aforesaid defendants;
and any other person, persons, firms,
partnerships, or corporate entities
who might claim title to the premises
herein described,
Defendants

No. 00-1363 C.D.

ACTION TO QUIET TITLE

Type of Pleading: Judgment Notice

Filed on behalf of: Ronald P. Dysard
and Barbara Ann Dysard, Plaintiffs

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law

Supreme Court No. 42519
900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-03

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

RONALD P. DYSARD and
BARBARA ANN DYSARD,
Plaintiffs

vs.

No. 00-1363 C.D.

STEPHEN E. SIEGLER and
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any heirs, persons claiming, or who might
claim title under the aforesaid defendants;
and any other person, persons, firms,
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who might claim title to the premises
herein described,
Defendants

ACTION TO QUIET TITLE

TO: Gwen M. Krilova
32 Smoke House Road
West Chester, PA 19382

JUDGMENT NOTICE

Please take note that judgment has been entered against you on the issue of
ownership or other property rights in the above captioned matter.

Prothonotary

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5025

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

RONALD P. DYSARD and
BARBARA ANN DYSARD,
Plaintiffs

vs.

No. 00-1363 C.D.

STEPHEN E. SIEGLER and
GWEN MICHELE SIEGLER, a/k/a
GWEN SIEGLER KRILOVA, and
any heirs, persons claiming, or who might
claim title under the aforesaid defendants;
and any other person, persons, firms,
partnerships, or corporate entities
who might claim title to the premises
herein described,
Defendants

ACTION TO QUIET TITLE

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

Personally appeared before me, the undersigned officer, David J. Hopkins, Attorney for Ronald P. Dysard and Barbara Ann Dysard, who, being duly sworn according to law, deposes and says that the service of the foregoing Complaint to Quiet Title, endorsed with Notice to Plead, has been served upon Defendants, Stephen E. Siegler and Gwen Michele Siegler a/k/a Gwen Siegler Krilova, pursuant to the Rules of Civil Procedure, and more than twenty (20) days have elapsed since said service and Defendant, Stephen E. Siegler and Gwen Michele Siegler a/k/a Gwen iegler Krilova were duly served with a "10 Day Notice" as required by Pa.R.C.P.

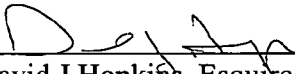
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Prothonotary

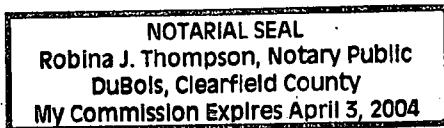


237.1, and that the said Defendants have not filed an appearance or any answer to the Complaint, although the time in which to do so has expired and Default Judgments have been entered against them by the Clearfield County Prothonotary.


David J. Hopkins, Esquire

Sworn to and subscribed before me this
15th day of August, 2001.


Notary Public



THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

CP

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

RONALD P. DYSARD and
BARBARA ANN DYSARD,
Plaintiffs

vs.

STEPHEN E. SIEGLER and
GWEN MICHELE SIEGLER, a/k/a
GWEN SIEGLER KRILOVA, and
any heirs, persons claiming, or who might
claim title under the aforesaid defendants;
and any other person, persons, firms,
partnerships, or corporate entities
who might claim title to the premises
herein described,

Defendants

No. 00-1363 C.D.

ACTION TO QUIET TITLE

Type of Pleading: Motion for Judgment

Filed on behalf of: Ronald P. Dysard and
Barbara Ann Dysard, Plaintiffs

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE
Attorney at Law

Supreme Court No. 42519
900 Beaver Drive
DuBois, Pennsylvania 15801

(814) 375-0300

FILED

AUG 15 2001

William A. Shaw
Prothonotary

WAS
1 cc *Att* Hopkins

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

RONALD P. DYSARD and
BARBARA ANN DYSARD,
Plaintiffs

vs.

No. 00-1363 C.D.

STEPHEN E. SIEGLER and
GWEN MICHELE SIEGLER, a/k/a
GWEN SIEGLER KRILOVA, and
any heirs, persons claiming, or who might
claim title under the aforesaid defendants;
and any other person, persons, firms,
partnerships, or corporate entities
who might claim title to the premises
herein described,
Defendants


ACTION TO QUIET TITLE

MOTION FOR JUDGMENT

AND NOW, this 15th day of August, 2001, an Affidavit having been filed by David J. Hopkins, Esquire, Attorney for Plaintiffs, Ronald P. Dysard and Barbara Ann Dysard; that the Complaint with Notice to Plead was served on the Defendants. Defendant Stephen E. Siegler was served by Sheriff pursuant to the Rules of Civil Procedure and Defendant Stephen E. Siegler has failed to file an answer and a default judgment has been entered against him. Defendant Gwen Michele Siegler a/k/a Gwen Siegler Krilova was served by Certified Mail pursuant to the Rules of Civil Procedure and Defendant Gwen Michele Siegler a/k/a Gwen Siegler Krilova has failed to file an answer and a default judgment has been entered against her. The Plaintiffs, by and through their attorney, moves the Court to enter judgment in favor of the Plaintiffs and against the Defendants in the above named case and to grant to the Plaintiffs the relief prayed for in accordance with Rules of Civil Procedure 1066. Plaintiffs further requests

that the Honorable Court modify in accordance with Rules of Civil Procedure, Rule 248, the thirty (30) day period provided Defendants by Rules of Civil Procedure, Rule 1066(b) to assert any right, lien, title or interest in the land inconsistent with the interest or claim Plaintiffs set forth in their Complaint.

Respectfully submitted,


David J. Hopkins, Esquire

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 10399

DYSARD, RONALD P. and BARBARA ANN

00-1363-CD

VS.

SIEGLER, STEPHEN E. AI

COPY

COMPLAINT ACTION TO QUIET TITLE

SHERIFF RETURNS

NOW NOVEMBER 17, 2000, WILLIAM HOSE, SHERIFF OF YORK COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON STEPHEN E. SIEGLER, DEFENDANT.

NOW NOVEMBER 28, 2000 SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON STEPHEN E. SIEGLER, DEFENDANT BY DEPUTIZING THE SHERIFF OF YORK COUNTY. THE RETURN OF SHERIFF HOSE IS HERETO ATTACHED AND MADE A PART OF THIS RETURN.

Return Costs

Cost	Description
27.88	SHFF. HAWKINS PAID BY: ATTY.
29.10	SHFF. HOSE PAID BY: ATTY.
10.00	SURCHARGE PAID BY: ATTY.

Sworn to Before Me This

____ Day Of _____ 2000

So Answers,



Chester A. Hawkins
Sheriff

THE HOPKINS LAW FIRM

900 Beaver Drive, DuBois, Pennsylvania 15801
VOICE: (814) 375-0300 FAX: (814) 375-5035

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

RONALD P. DYSARD and
BARBARA ANN DYSARD,
Plaintiffs

vs.

No. 00-1363 C.D.

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GWEN MICHELE SIEGLER, a/k/a
GWEN SIEGLER KRILOVA, and
any heirs, persons claiming, or who might
claim title under the aforesaid defendants;
and any other person, persons, firms,
partnerships, or corporate entities
who might claim title to the premises
herein described,
Defendants

ACTION TO QUIET TITLE

FILED

AUG 16 2001

William A. Shaw
Prothonotary

ORDER

AND NOW, this 16th day of August, 2001, it appearing that service of the Complaint to Quiet Title in the above stated action was served upon Defendants, Stephen E. Siegler and Gwen Michele Siegler a/k/a Gwen Siegler Krilova, pursuant to the Rules of Civil Procedure; and by Affidavit of David J. Hopkins, Attorney for Plaintiffs, that no answer or appearance has been filed to said action, and on Motion of David J. Hopkins, Esquire, it is hereby ORDERED and DECREED:

1. That the Defendants, Stephen E. Siegler and Gwen Michele Siegler a/k/a Gwen Siegler Krilova, are forever barred from asserting any right, title, lien or interest inconsistent with the interest or claim of the Plaintiffs as set forth in their Complaint in and to:

All that certain tract of land designated as Section 19, Lot 375, in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania.

2. That title to said property is now vested in Ronald P. Dysard and Barbara Ann Dysard as prayed.

3. That the rights of the Plaintiffs are superior to the rights of the Defendants, Stephen E. Siegler and Gwen Michele Siegler a/k/a Gwen Siegler Krilova.

4. That the Plaintiffs have title in fee simple to said premises as described in the Complaint as against the Defendants, Stephen E. Siegler and Gwen Michele Siegler a/k/a Gwen Siegler Krilova.

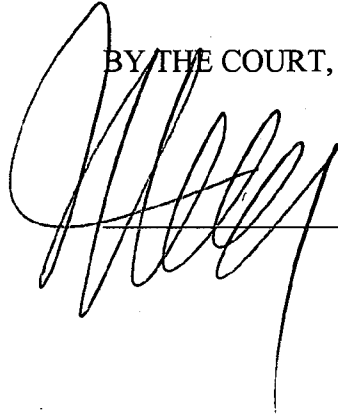
5. That the Defendants, Stephen E. Siegler and Gwen Michele Siegler a/k/a Gwen Siegler Krilova, are forever barred from asserting any right, title or interest in or to the premises described which are inconsistent with the interest or claims of the Plaintiffs as set forth in their Complaint and from setting up any title to the premises and from impeaching, denying or in any way attacking the title of the Plaintiffs to the premises.

6. That the thirty (30) days provisions of Pennsylvania Rules of Civil Procedure 1066(b)(i) be modified as to eliminate the said thirty (30) day Rule of Pennsylvania Rules of Civil Procedure from this case. Said modification is in accordance with the authority vested in this Court by virtue of Pennsylvania Rules of Civil Procedure 248 to eliminate any time period prescribed by Pennsylvania Rules of Civil Procedure upon Order of Court.

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

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

BY THE COURT,

A large, stylized handwritten signature in black ink, written over a horizontal line.

JUDGE

FILED

0/11-5784
AUG 16 2001

WESLEY A. SHAW
PROSECUTOR

1 cc Atty
Hopkins

CD
HKS