

00-1394-CD  
EDGAR L. ENGLISH -vs- MICHAEL J. ZETTS etal

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

EDGAR L. ENGLISH,  
Plaintiff

VS.

NO. 00- 1394 -CD

MICHAEL J. ZETTS a/k/a  
MICHAEL JAMES ZETTS and  
LORRAINE ZETTS, his wife,  
their heirs, successors and/or assigns,  
HOWARD J. FOLMAR, his heirs,  
successors, and/or assigns, and/or any  
person or entity claiming title in and to  
the herein described premises under them,  
Defendants

CASE NUMBER: 00- -CD

TYPE OF CASE: Quiet Title Action

TYPE OF PLEADING: COMPLAINT

FILED ON BEHALF OF: Plaintiffs

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**

5001  
on 0/4:00/1ms  
NOV 09 2000  
William A. Shaw  
Prothonotary 80 90.-  
2 CRIT 70172

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

EDGAR L. ENGLISH,	:			
Plaintiff	:			
VS.	:	NO.	oo-	-CD
	:			
MICHAEL J. ZETTS a/k/a	:			
MICHAEL JAMES ZETTS and	:			
LORRAINE ZETTS, his wife,	:			
their heirs, successors and/or assigns,	:			
HOWARD J. FOLMAR, his heirs,	:			
successors, and/or assigns, and/or any	:			
person or entity claiming title in and to	:			
the herein described premises under	:			
them,	:			
Defendants	:			

**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)

EDGAR L. ENGLISH,	:			
Plaintiff	:			
VS.	:	NO.	oo-	-CD
	:			
MICHAEL J. ZETTS a/k/a	:			
MICHAEL JAMES ZETTS and	:			
LORRAINE ZETTS, his wife,	:			
their heirs, successors and/or assigns,	:			
HOWARD J. FOLMAR, his heirs,	:			
successors, and/or assigns, and/or any	:			
person or entity claiming title in and to	:			
the herein described premises under	:			
them,	:			
Defendants	:			

**COMPLAINT**

AND NOW, comes EDGAR L. ENGLISH, by and through his attorney, R.  
DENNING GEARHART, who aver as follows:

1. That Plaintiffs is EDGAR L. ENGLISH, an adult individual, with an address of R.R. #1, Box 196-C, Philipsburg, Clearfield County, Pennsylvania 16866.
2. That Defendant MICHAEL J. ZETTS a/k/a MICHAEL JAMES ZETTS, is believed to have passed away with a last known residence being 2971 Prior Road, Akron, Ohio 44319. A search of the appropriate records revealed no Estate being filed for Michael J. Zetts a/k/a Michael James Zetts in the Register of Wills Office of Clearfield County.
3. That Defendant, LORRAINE ZETTS, is believed to have passed away with a last known residence being 2971 Prior Road, Akron, Ohio. A search of the appropriate records revealed no Estate, but a Death Certificate and Affidavit being filed in the Register of Wills Office of Clearfield County to File No. 82-477.

4. That Defendant, HOWARD J. FOLMAR, is believed to have passed away with a last known residence being in the Township of Cooper, Clearfield County, Pennsylvania. A search of the appropriate records revealed no Estate being filed for Howard J. Folmar in the Register of Wills Office of Clearfield County. Thus, it is believed and therefore averred that he died intestate, without issue.

5. The property which is the subject of this action is identified as Tax Map Nos. 110-To7-39 and 110-To7-56 and more specifically described as follows:

**PARCEL 1**

**ALL** that certain lot or piece of ground situate in Cooper Township, Clearfield County, Pennsylvania, bounded and described as follows:

**BEGINNING** at a corner on the South; thence running West 68 rods to a post; thence North 18 perch to post; thence East 68 rods to a post; thence South 18 perches to post and place of beginning.

Being identified in the Clearfield County Mapping and Assessment Office as Map No. 110-T7-000-00039.

A N D

**PARCEL 2**

**ALL** that certain lot or piece of ground situate in Cooper Township, Clearfield County, Pennsylvania, bounded and described as follows:

**BEGINNING** at a post on the South corner of land now or formerly of Michael J. Zetts; thence West 68 rods to post; thence North to post on land now or formerly of Westberg, 18 perches; thence East 68 rods to a post; thence South 18 perches to a post and place of beginning.

Being identified in the Clearfield County Mapping and Assessment Office as Map No. 110-T7-000-00056.

6. That Edgar L. English purchased Parcel No. 1 and Parcel No. 2 from Marvin E. Dawkins, et ux by Deed dated September 23, 2000 and found for record in the Recorder's Office of Clearfield County to Instrument No.200014410.

7. That Marvin E. Dawkins obtained Parcel No. 1 by Deed from Michael James Zetts dated August 15, 1984 and found for record in the Recorder's Office of Clearfield to Deeds & Records Book Volume 977, Page 381.

8. As to Parcel No. 1, Marvin E. Dawkins obtained this parcel by Deed from Michael James Zetts dated August 15, 1984 and found for record in the Recorder's Office of Clearfield County in Deed Book Volume 977, Page 379.

9. Michael James Zetts obtained this property, together with his wife, Lorraine Zetts, by Deed from Andrew J. Zetts and Georgia V. Zetts, his wife dated December 20, 1951 and found for record in the Recorder's Office of Clearfield County in Deed Book 418, Page 160.

10. That Andrew J. Zetts acquired this property from Martin E. Swanson by Deed dated December 11, 1939 and found for record in the Recorder's Office of Clearfield County in Deed Book Volume 326, Page 149.

11. In this chain of title, there is found a Deed from Michael J. Zetts and Loraine A. Zetts, his wife to Howard J. Folmar dated April 18, 1947 and found for record in the Recorder's Office of Clearfield County to Deed Book Volume 385, Page 420.

12. That Michael James Zetts obtained Parcel No. 2 by Deed from the Clearfield County Commissioners dated December 28, 1951 and found for record in the Recorder's Office of Clearfield County in Deed Book Volume 361, Page 547.

13. That said property was seized and taken from Michael Zetts for delinquent taxes by the Treasurer of Clearfield County by Deed dated April 24, 1950 and filed for record in the Recorder's Office of Clearfield County in Deed Book Volume 361, Page 546.

14. That Michael J. Zetts obtained this property by Deed from Martin E. Swanson dated December 11, 1939 and found for record in the Recorder's Office of Clearfield County in Deed Book 326, Page 150.

15. That the properties identified as Tax Map No. 110-T7-39 and 110-T7-56 are identically described in both chains of title.

16. That with respect to this property, Plaintiff and his 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 his predecessors in title believed this was conveyed to them and as a result of that belief, they have 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 Defendants, their heirs, successors and assigns identified in Paragraphs 2 through 4 of this Complaint are the only persons or entity known to Plaintiffs 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.

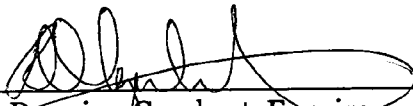
**WHEREFORE, Plaintiffs request:**

A. that by decree of your Honorable Court it may be declared that title to the premises set forth in Paragraph 5 is in the Plaintiff and that he 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 Plaintiffs 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



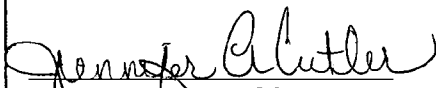
COMMONWEALTH OF PENNSYLVANIA :  
: SS:  
COUNTY OF CLEARFIELD :

**AFFIDAVIT**

Before me, the undersigned officer, personally appeared, EDGAR L. ENGLISH 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 his knowledge, information, and belief.

  
\_\_\_\_\_  
EDGAR L. ENGLISH

Sworn to and subscribed  
before me this 6<sup>th</sup> day  
of November, 2000.

  
\_\_\_\_\_  
Notary Public

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

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

EDGAR L. ENGLISH,  
                                Plaintiff  
VS.

MICHAEL J. ZETTS, et al,  
                                Defendants

COMPLAINT

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

Lap over margin

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

EDGAR L. ENGLISH,  
Plaintiff  
VS.

NO. 00-1394 -CD

MICHAEL J. ZETTS a/k/a  
MICHAEL JAMES ZETTS and  
LORRAINE ZETTS, his wife,  
their heirs, successors and/or assigns,  
HOWARD J. FOLMAR, his heirs,  
successors, and/or assigns, and/or any  
person or entity claiming title in and to  
the herein described premises under  
them,  
Defendants

**AFFIDAVIT**

COMMONWEALTH OF PENNSYLVANIA :  
: SS.  
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. A search of the Courthouse records as found in Clearfield County  
have provided no further information as to the above-named Defendants, their heirs,  
successors or assigns.

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

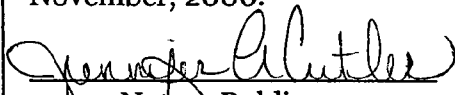
3. That I have made a good faith effort to find the whereabouts of the  
Defendants and all their heirs, successors and assigns.

Further, the deponent sayeth not.

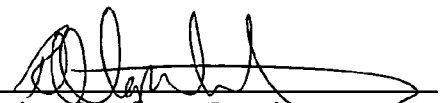
Sworn to and subscribed

before me this 8<sup>th</sup> day of

November, 2000.

  
Notary Public

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

  
R. Denning Gearhart, Esquire

**FILED**

NOV 09 2000

0/4:00/401  
William A. Shaw  
Prothonotary



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

EDGAR L. ENGLISH,  
Plaintiff  
VS.

MICHAEL J. ZETTS, et al,  
Defendants

AFFIDAVIT

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

Lap over margin

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

EDGAR L. ENGLISH,	:	
Plaintiff	:	
VS.	:	NO. 00- 1394 -CD
	:	
MICHAEL J. ZETTS a/k/a	:	
MICHAEL JAMES ZETTS and	:	
LORRAINE ZETTS, his wife,	:	
their heirs, successors and/or assigns,	:	
HOWARD J. FOLMAR, his heirs,	:	
successors, and/or assigns, and/or any	:	
person or entity claiming title in and to	:	
the herein described premises under	:	
them,	:	
Defendants	:	

CASE NUMBER: 00- -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

0/4:00/44

William A. Shaw  
Prothonotary

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

EDGAR L. ENGLISH,  
Plaintiff

VS.

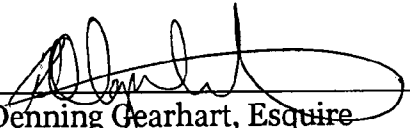
NO. 00- -CD

MICHAEL J. ZETTS a/k/a  
MICHAEL JAMES ZETTS and  
LORRAINE ZETTS, his wife,  
their heirs, successors and/or assigns,  
HOWARD J. FOLMAR, his heirs,  
successors, and/or 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 Defendants, their heirs, successors and assigns, are 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 Progress, Clearfield, Pennsylvania, and the Clearfield County Legal Journal, Clearfield, Pennsylvania.

Respectfully submitted,

  
R. Denning Gearhart, Esquire  
Attorney for Plaintiffs

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

EDGAR L. ENGLISH,  
Plaintiff

VS.

NO. oo- -CD

MICHAEL J. ZETTS a/k/a  
MICHAEL JAMES ZETTS and  
LORRAINE ZETTS, his wife,  
their heirs, successors and/or assigns,  
HOWARD J. FOLMAR, his heirs,  
successors, and/or assigns, and/or any  
person or entity claiming title in and to  
the herein described premises under  
them,

Defendants

**ORDER**

AND NOW, to wit, this 14<sup>th</sup> 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 Progress, Clearfield, Pennsylvania and the Clearfield County Legal Journal, Clearfield, Pennsylvania.

BY THE COURT

JUDGE

**FILED**

NOV 14 2000  
0111:50 am  
William A. Shaw  
Prothonotary

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

EDGAR L. ENGLISH,  
Plaintiff  
VS.

MICHAEL J. ZETTS, et al,  
Defendants

MOTION FOR PUBLICATION

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

Lap over margin



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

EDGAR L. ENGLISH,  
Plaintiff

VS.

NO. 00-1394-CD

MICHAEL J. ZETTS a/k/a  
MICHAEL JAMES ZETTS and  
LORRAINE ZETTS, his wife,  
their heirs, successors and/or assigns,  
HOWARD J. FOLMAR, his heirs,  
successors, and/or assigns, and/or any  
person or entity claiming title in and to  
the herein described premises under  
them,

Defendants



DEC 06 2000  
William A. Shaw  
Prothonotary

**AFFIDAVIT**

The undersigned hereby certifies that he did cause to have published in The Progress 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 4th day

of December, 2000.

  
Notary Public

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

IN THE COURT  
OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNSYLVANIA  
(CIVIL DIVISION)  
NO. 00-1394-CD

EDGAR L. ENGLISH, Plaintiff  
VS.  
MICHAEL J. ZETTS, a/k/a MICHAEL JAMES ZETTS and LORRAINE ZETTS, his wife, their heirs, successors and/or assigns, HOWARD J. FOLMAR, his heirs, successors, and/or assigns, and/or any person or entity claiming title in and to the herein described premises under them, Defendants

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 defenses 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, Cooper Township and more particularly described as follows:

PARCEL 1

ALL that certain lot or piece of ground situate in Cooper Township, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a corner on the South thence running West 68 rods to a post; thence North 18 perches to post; thence East 68 rods to a post; thence South 18 perches to post and place of beginning.

Being identified in the Clearfield County Mapping and Assessment Office as Map No. 110-T7-000-00039.

AND

PARCEL 2

ALL that certain lot or piece of ground situate in Cooper Township, Clearfield County, Pennsylvania, bounded and described as follows:

BEGINNING at a post on the South corner of land now or formerly of Michael J. Zetts; thence West 68 rods to post; thence North to post on land now or formerly of Westberg, 18 perches; thence East 68 rods to a post; thence South 18 perches to a post and place of beginning.

Being identified in the Clearfield County Mapping and Assessment Office as Map No. 110-T7-000-00056.

Further, the Court of Common Pleas of Clearfield County, Pennsylvania, did by Order executed the 14th day of November, 2000, direct that notice of this action be served upon you by advertisement in The Progress 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 Plaintiff as set forth in his Complaint.

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

11:22-1d-b

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :  
COUNTY OF CLEARFIELD : SS:

On this 1st day of December, A.D. 2000, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Margaret E. Krebs, who being duly sworn according to law, deposes and says that she is the President of The Progressive Publishing Company, Inc., and Associate Publisher of The Progress, a daily newspaper published at Clearfield, in the County of Clearfield and State of Pennsylvania, and established April 5, 1913, and that the annexed is a true copy of a notice or advertisement published in said publication in

the regular issues of November 22, 2000. And that the affiant is not interested in the subject matter of the notice or advertising, and that all of the allegations of this statement as to the time, place, and character of publication are true.

Sworn and subscribed to before me the day and year aforesaid.

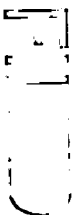
Notary Public Clearfield, Pa.

My Commission Expires  
September 16, 2004

Notarial Seal  
Ann K. Law, Notary Public  
Clearfield Boro, Clearfield County  
My Commission Expires Sept. 16, 2004

Member, Pennsylvania Association of Notaries

Lap over margin



FEB 06 2000

07907/1000

William A. Shaw

Prothonotary

(pk)

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

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

EDGAR L. ENGLISH,  
Plaintiff

VS.

NO. 00-1394-CD

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their heirs, successors and/or assigns,  
HOWARD J. FOLMAR, his heirs,  
successors, and/or assigns, and/or any  
person or entity claiming title in and to  
the herein described premises under  
them,

Defendants

**FILED**

JAN 03 2001

01/18/01 NO C  
William A. Shaw  
Prothonotary

EC  
1/18

**AFFIDAVIT**

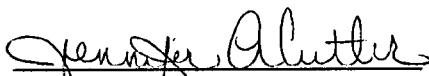
The undersigned hereby certifies that he did cause to have published in the  
Clearfield County Legal Journal the Notice for the Complaint with regard to the Quiet Title  
Action filed to the above on the Defendants, their heirs, successors and assigns, as  
evidenced by Exhibit 'A' attached hereto.

  
R. Denning Gearhart, Esquire  
Attorney for Plaintiff

Sworn to and subscribed

before me this 2nd day

of January, 2001.

  
Notary Public

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

## PROOF OF PUBLICATON

**STATE OF PENNSYLVANIA**

:

**COUNTY OF CLEARFIELD**

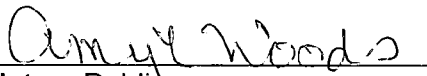
:

On this 8th day of December AD 2000, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro, who being duly sworn according to law, proposes and says that he is the editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement published in said publication in the regular issues of Week of December 1, 2000, Vol. 12, No. 48. And that all of the allegations of this statement as to the time, place, and character of the publication are true.

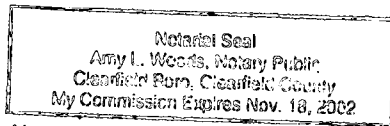


Gary A. Knaresboro, Esquire  
Editor

Sworn and subscribed to before me the day and year aforesaid.



Notary Public  
My Commission Expires



Member, Pennsylvania Association of Notaries

R. Denning Gearhart  
215 East Locust Street  
Clearfield, PA 16830

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 claim 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 FIND ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP. COURT ADMINISTRATOR, 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

of advertisement, you shall be, by appropriate order, forever barred from asserting any right, lien title or interest or claim of the Plaintiff as set forth in his Complaint.

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

#### TAX SALE

Notice is hereby given of the proposed private sale by the Clearfield County Tax Claim Bureau of a parcel of land in BLOOM TOWNSHIP known as Map #104-D08-000-00005 and described as "H & 0.8 A" and assessed to "COMMODORE P. MITCHELL."

Sale will be held on JANUARY 30, 2001 at 9:00 AM in the Tax Claim Bureau, 230 E. Market Street Clearfield. The property will be sold free and clear of all tax claims and tax judgments. A bid of \$500.00 has been received and accepted by the Bureau. Any party not satisfied with the accepted sale price must, within forty-five days of this notice, petition the Court of Common Pleas to disapprove the sale.

Clearfield County Tax Claim Bureau, 230 E. Market Street, Suite 121, Clearfield, PA 16830.

ADV: December 1st & 15th, 2000.

#### TAX SALE

Notice is hereby given of the proposed private sale by the Clearfield County Tax Claim Bureau of a parcel of land in WOODWARD TOWNSHIP known as Map #130-M14-412-00016 and described as "2 L #189-190" and assessed to "HAROLD C. WEST."

Sale will be held on JANUARY 30, 2001 at 9:00 AM in the Tax Claim Bureau, 230 E. Market Street Clearfield. The property will be sold free and clear of all tax claims and tax judgments. A bid of \$125.00 has been received and accepted by the Bureau. Any party not satisfied with the accepted sale price must, within forty-five days of this notice, petition the Court of Common Pleas to disapprove the sale.

Clearfield County Tax Claim Bureau, 230 E Market Street, Suite 121, Clearfield, PA 16830.

ADV: December 1st & 15th, 2000.

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

EDGAR L. ENGLISH,  
Plaintiff

VS.

NO. 00-1394-CD

MICHAEL J. ZETTS a/k/a  
MICHAEL JAMES ZETTS and  
LORRAINE ZETTS, his wife,  
their heirs, successors and/or assigns,  
HOWARD J. FOLMAR, his heirs,  
successors, and/or assigns, and/or any  
person or entity claiming title in and to  
the herein described premises under  
them,

Defendants

**FILED**

JAN 10 2001

William A. Shaw  
Prothonotary

**ORDER**

AND NOW, this 9<sup>th</sup> day of January, 2001, it appearing that

service of the Complaint in the above captioned case, with notice to plead, was served in The Progress, Clearfield, Pennsylvania and the Clearfield County Legal Journal, Clearfield, Pennsylvania, 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 their Complaint in and for all that certain piece or parcel of land situate in the Commonwealth of Pennsylvania, County of

Clearfield, Cooper Township, having Tax Map Nos. 110-T07-39 and 110-T07-56 and more specifically described as follows:

**PARCEL 1**

**ALL** that certain lot or piece of ground situate in Cooper Township, Clearfield County, Pennsylvania, bounded and described as follows:

**BEGINNING** at a corner on the South; thence running West 68 rods to a post; thence North 18 perch to post; thence East 68 rods to a post; thence South 18 perches to post and place of beginning.

Being identified in the Clearfield County Mapping and Assessment Office as Map No. 110-T7-000-00039.

A N D

**PARCEL 2**

**ALL** that certain lot or piece of ground situate in Cooper Township, Clearfield County, Pennsylvania, bounded and described as follows:

**BEGINNING** at a post on the South corner of land now or formerly of Michael J. Zetts; thence West 68 rods to post; thence North to post on land now or formerly of Westberg, 18 perches; thence East 68 rods to a post; thence South 18 perches to a post and place of beginning.

Being identified in the Clearfield County Mapping and Assessment Office as Map No. 110-T7-000-00056.

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 Praecipe of Plaintiff, shall enter final judgment for Plaintiff and against said named Defendants, their heirs, successors and assigns.



3. That the rights of Plaintiff in said premises are at all times superior to the rights of said named Defendants, their heirs, successors and assigns and that the Plaintiffs have 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



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

EDGAR L. ENGLISH,  
Plaintiff

VS.

NO. 00-1394-CD

MICHAEL J. ZETTS a/k/a  
MICHAEL JAMES ZETTS and  
LORRAINE ZETTS, his wife,  
their heirs, successors and/or assigns,  
HOWARD J. FOLMAR, his heirs,  
successors, and/or assigns, and/or any  
person or entity claiming title in and to  
the herein described premises under them,  
Defendants

**FILED**

FEB 14 2001  
01:45 PM  
William A. Shaw  
Prothonotary



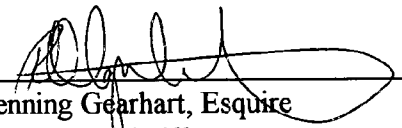
**PRAECIPE TO ENTER FINAL JUDGMENT**

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 9th day of January, 2001.

Respectfully submitted,

Dated: February 14, 2001

  
R. Denning Gearhart, Esquire  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
(CIVIL DIVISION)  
NO. 00-1394-CD

EDGAR L. ENGLISH,  
Plaintiff  
VS.

MICHAEL J. ZETTS, et al,  
Defendants

O R D E R

FILED

JAN 10 2001  
01/10/01 acc-cty  
William A. Shaw  
Prothonotary

*Shaw*

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